

SECTION III.

Public and Stakeholder Consultation

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Public and Stakeholder Consultation

Public consultation for the development of the State of Indiana 2016 Action Plan included listening sessions held around the state, two online surveys and the 45-day public comment period (February 15 through March 31, 2016). This chapter presents the findings from the public and stakeholder consultation.

Key Findings

Key findings from consultation with the public and stakeholders about housing, homeless and community development needs include:

- Owner-occupied repair, demolition of blighted housing and affordable housing are the top priority unmet housing needs statewide.
 - In some parts of the state, a subset of housing needs included housing for migrant/seasonal workers. Stakeholders in Knox County and Daviess County identified these needs in listening sessions and the Action Plan Public Hearing.
- Participants in the listening sessions and survey identified their priorities for community development in three categories—quality of life, infrastructure and economic development.
 - Downtown revitalization, façade improvements and parks/trails were the top quality of life needs;
 - Sidewalk improvements, road improvements and stormwater/bridges were the top infrastructure needs; and
 - Workforce development, business attraction and brownfield redevelopment were the top economic development priorities.
- Public transit for all was the top priority of participants in the public comment period survey.

Altogether, 339 Indiana residents and stakeholders participated in the Action Plan process:

- A total of 58 stakeholders participated in the listening sessions held in Greensburg, Marion, Monticello and Washington in October and November 2015.
- For those unable to attend a listening session in person, an online listening survey replicated the need prioritization exercises conducted in the listening sessions—135 stakeholders participated.
- To validate the priorities identified in the listening sessions and survey, and to offer an additional channel to comment on the draft Action Plan, a second online survey was available to residents and stakeholders during the public comment period—25 participants.

- A total of 62 participated in the March 22, 2016 public hearing held in Indianapolis and broadcast live to four additional locations—Huntington, Rensselaer, Scottsburg and Vincennes.
- 57 individuals or organizations submitted written public comments on the draft Action Plan.

How do the findings differ from past years’? Outreach conducted in 2013, 2014 and 2015—regional meetings and a stakeholder survey each year—yielded very similar results to the 2016 consultation process. As we began to see in 2015, housing needs have shifted away from a focus on specific populations to broader needs for all types of poverty-level households.. The exception is migrant farmworkers; Although not a need in every county, 2016’s regional listening sessions surfaced a need for migrant/seasonal farmworker housing as an emerging urgent issue that may necessitate a coordinated strategic response from multiple partners.

Housing rehabilitation remains a significant concern of all types of stakeholders

Input from Public Hearings & Written Comments

On March 22, 2016 a public hearing was held to accept comments on the draft 2016 Action Plan. The hearing was held in Indianapolis and simulcast in four accessible locations throughout the state from 4:00 pm to 6:00 pm. Altogether, 62 people attended the hearings. This compares to 10 attendees in 2013, 16 in 2014 and 23 in 2015.

The hearings included a presentation that provided background information about the Consolidated Plan and Action Plan process and requirements, presented the proposed program allocation for the 2016 Program Year (PY2016) and priorities identified through the public and stakeholder consultation process. A copy of the presentation from the hearings is attached to this section. Written comments received during the 30-day comment period are summarized below and are appended to this chapter.

The hearings were held in:

- Indianapolis (Central Indiana),
- Huntington (Northeast),
- Rensselaer (Northwest),
- Scottsburg (Southeast), and
- Vincennes (Southwest).

Attendees shared the following comments and had the following questions about the Draft Consolidated Plan during the public hearings:

- Comment No. 1: IHCD’s annual allocation for migrant/seasonal farmworker housing should be restored. There are no other sources of funds for farmworker housing development. Eighty-five percent of fruits and vegetables are still hand-picked and migrants provide most of the labor. They are not taking jobs away from Indiana residents; rather,

they create jobs in supporting agricultural industries that are a large part of the state's economy.

- Question No. 1: Will IHCD continue to prioritize the owner-occupied rehabilitation program for seniors? *Yes, although anyone can apply. IHCD will also be starting an accessibility ramp program on April 4, 2016, funded by the CDBG—OOR allocation.*
- Question No. 2: Will ESG dollars be allocated to permanent or transitional housing? Only agencies that received *ESG dollars in the prior program year are eligible to apply for transitional housing activities* Per HUD regulations, no new transitional housing programs can apply.

A portion of ESG funding is utilized for rapid rehousing that is considered permanent housing. It is short to medium term rental assistance and other financial support along with supportive services.

- Comments No. 2 and 3: Migrant farmworker housing should be a priority. Without assisted housing, migrant workers are severely cost burdened. In Knox County, workers are paying \$320/week for housing, leaving very little left over to care for their families. These workers are very important to the state's economy and support a range of high paying jobs. Housing is needed to continue to support this industry.

Written comments submitted during 30-day comment period. Stakeholders and members of the public submitted 57 written public comments on the draft Action Plan. The public's comments primarily focused on migrant farmworker housing (8 comments); housing for persons with disabilities (20 comments); and comments addressing proposed allocations not specific to a particular population segment (3 comments). IHCD and ORCA responses to each follow. The full comments are appended to this chapter and summarized below.

- **Migrant/seasonal farmworker housing (Public Comments #1, 2, 3, 5, 6, 20, 25 and 28)**—Each public comment on the subject of migrant farmworker housing requested restoration of or dedication of funding to provide safe and habitable housing for migrant farmworkers. Current conditions include overcrowding, unsafe/hazardous/unsanitary living conditions, and/or a lack of housing near farms (resulting in workers driving more than one hour each way).

Our commitment to foster productive dialogue about housing solutions for migrant/seasonal farmworkers does not necessitate a change in the 2016 Action Plan. IHCD remains open to exploring the use of loan sources such as the Development Fund and Section 108 loans to fund developments for migrant/seasonal farmworkers.

- **Housing for persons with disabilities (Public Comments #4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 21, 24, 26, 29, 30 and 31)**—Public commenters on housing for residents with disabilities made several recommendations:
 - Accessible units, including accessible LIHTC units, are not affordable to residents with disabilities and low income, and are therefore often occupied by tenants

that do not require the unit's accessibility features. To rectify this mismatch, commenters recommend requiring accessible LIHTC units to be affordable at or below 20 percent of AMI or that rental subsidies be tied to the accessible units;

- IHCDAs should affirm and continue its leadership in implementing Olmstead through the Section 8 voucher program (and others) and continue incentivizing development that provides opportunities for livable integrated housing and visitable housing.
- A lack of affordable accessible housing—especially for residents with disabilities on SSI income (18% of AMI)—continues to be a problem.
- Home ownership is out of reach for residents with a disability and low income. Restoration of the Section 8 Homeownership program and re-establishing up to \$10,000 in down payment assistance will make homeownership more attainable.
- Allow funding for minor home repair to be used for rental properties.

In response to Public Comments #4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 21, 24, 26, 29, 30 and 31 on the subject of affordability and accessible LIHTC units and of affordable housing for persons living on disability income (18% of AMI):

Our commitment to expanding the supply of housing that is accessible and affordable to residents with disabilities, particularly those living on disability income, does not necessitate a change in the 2016 Action Plan.

In response to Public Comments #4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 21, 24, 26, 29, 30 and 31 on the subject of IHCDAs leadership in Olmstead implementation and incentivizing opportunities for livable integrated housing and visitable housing:

- *IHCDA affirms its commitment to continue to lead Indiana's Olmstead implementation and our work to support livable integrated housing and visitable housing. We will continue to work with disability community advocates and representatives to develop an internal Olmstead Plan to govern IHCDAs investments.*

In response to Public Comments #4, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 21, 24, 26, 29, 30 and 31 on the subject restoring the Section 8 Homeownership program and re-establishing up to \$10,000 in down payment assistance:

- *IHCDA also values programs that create homeownership opportunities for all Hoosiers, including those with disabilities or very low incomes. At this time, however, we believe that needs in other areas, as defined in the 2016 Action Plan are a higher priority for the coming program year. While we cannot allocate funds this year, we will look for opportunities for IHCDAs to support the efforts of our partners across the state to expand homeownership opportunities.*

- Other comments—Public comments not directly focused on migrant/seasonal farmworkers or residents with disabilities made a number of specific recommendations for the Action Plan. These include:

- (Public Comment #15) Shift focus to a smaller number of grantees with larger funding amounts; eliminating the pro rata draw requirement on infrastructure projects; decreasing the local match amount in order to make participation more feasible for small communities; expand owner-occupied repair programs to include female head of household or single parent households; reinstate the rental rehabilitation program;

Response to Public Comment #15: At this time, ORCA is prioritizing smaller awards to make a greater impact throughout the. We appreciate the suggestion to eliminate the pro rata draw requirement on infrastructure projects, but ORCA will continue to follow this process. We will review the feasibility of reducing local match amounts in future years.

IHCDA will continue to prioritize allocation of owner-occupied repair program funds to seniors who have the greatest demonstrated need for this program, by awarding points for proposals targeting senior households. However, the application does not preclude other eligible households from receiving owner-occupied repair funds. In order to properly fund higher priority activities, IHCDA does not intend to reinstate the rental rehabilitation program for the 2016 Action Plan program year. IHCDA will continue to monitor this need and will consider reinstating the program in the 2017 Action Plan.

- (Public Comment #23) Invest in sidewalk, accessibility and road improvements in addition to wastewater; substantially increase the \$250,000 proposed for workforce development; broaden range of economic development activities (e.g., microenterprise lending); make public transportation a larger priority overall, and do not focus just on communities with existing services but on strategies that could add service to new communities; reinstate rental rehabilitation program; take a more comprehensive approach to family homelessness (not just Housing First); reduce funding to Stellar Communities and main street revitalization and increase funding for owner-occupied rehabilitation, workforce development and blight elimination; and

Response to Public Comment #23: In response to public comments, OCRA increased the amount of PFP funding from \$400,000 to \$500,000. As the Workforce Development program is still considered a pilot program, ORCA will not alter funding amounts without evaluation of data collected after the initial round of projects are complete. However, we agree that a broader mix of economic development activities is warranted. ORCA will not alter the funding amounts for Stellar or Main Street Revitalization at this time.

ORCA and IHCDA understand the critical role of public transit in the lives of transit-dependent populations, particularly residents with disabilities, seniors and very low income households. For residents living outside of existing transit service areas, a lack of transportation creates barriers to employment and activities of

daily living for these residents. IHCD will commit to participating in state and regional efforts to expand transportation opportunities to our residents and will explore how to best leverage IHCD's resources to support these goals. In order to properly fund higher priority activities, IHCD does not intend to reinstate the rental rehabilitation program for the 2016 Action Plan program year. IHCD will continue to monitor this need and will consider reinstating the program in the 2017 Action Plan. When implementing our homeless programs for families, we will encourage grantees to adopt best practices in programming for this unique population.

- (Public Comment #27) Reduce local match requirements for Tier 3 (and possible Tier 2) Wastewater and Drinking Water (WDW) projects; reinstate funding for fire trucks; and Blight Clearance Program (BCP) should include points for all brownfields with assessment reports (including EPA and Indiana Department of Environmental Management (IDEM) assigned numbers) and not be limited to Indiana Finance Agency (IFA) registry.

Response to Public Comment #27:

- *OCRA will not alter local match requirements for WDW projects at this time to ensure maximum benefit of CDBG funds throughout the state. In order to meet higher priority needs and fund permanent facilities, funding for fire trucks will not be reinstated in the 2016 Action Plan. OCRA will research the impact of expanding the BCP to all brownfields with assessment reports, rather than the current policy based on the IFA registry.*

In addition, IHCD accepted comments on policy changes to the owner-occupied rehabilitation and HOME programs; these comments and IHCD responses are attached to this section.

Findings from Listening Sessions and Surveys

This section summarizes the housing, community development, economic development and infrastructure needs and priorities identified by participants in the listening sessions, listening survey and comment survey.

Outreach. Each of the in-person and online participation opportunities were promoted to any and all governments, nonprofit organizations, faith-based organizations, local and regional civic organizations, planning organizations, private sector housing providers and developers and any other interested stakeholder. Promotional efforts included flyers distributed to promote the in-person listening sessions as well as emails and web postings inviting stakeholders to participate in the surveys.

Process for identifying needs and priorities. Each of the three methods for participating in the development or review of the 2016 Action Plan included an exercise to identify greatest unmet needs in housing, economic development, community development and infrastructure.

Listening sessions. Listening sessions began with introductory remarks about the Consolidated Plan and the Annual Plan process. As a group, participants discussed housing, infrastructure, economic development and quality of place needs locally. After discussion, the group created a list of priority needs or activities for each topic area and were directed to “vote” for their highest

priorities by allocating six dots across the four categories. This voting exercise reflected each group's priorities for investment.

Listening survey. In order to include as many stakeholder perspectives from across the state in the identification of needs and priorities, IHDC and ORCA developed an online that replicated the in-person session voting process based on the categories of need developed by listening session participants.

Comment survey. The types of housing and community development needs and priorities identified in the listening sessions were developed by the participants. Historically, stakeholder surveys have relied on a lengthy set of needs associated with resident characteristics (i.e., income as a percentage of AMI; disability status) as well as specific types of community needs (i.e., sidewalks, stormwater improvements). The public comment survey was consistent with surveys deployed in prior years to both provide a direct comparison point but also to gain additional insight into needs across the state.

Listening survey and comment survey participant characteristics. Among the 135 listening survey participants:

- One in five represent nonprofit organizations;
- One in five serve on local city councils;
- 16 percent are planning professionals;
- 8 percent are economic development professionals;
- 5 percent are county commissioners;
- 2 percent are mayors; and

The remainder is comprised of township trustees, town managers, real estate professionals, county auditors or treasurers, school board members or serve on city/county councils or commissions. The profile of in-person session participants was similar to that of the online participants.

Among the 25 respondents to the comment survey, the most common services or type of organization include:

- 38 percent work in organizations that provide services to low income residents;
- 30 percent are in the field of affordable housing advocacy and 30 percent work in organizations that develop affordable housing;
- 30 percent provide homeless services; and
- 21 percent provide affordable housing.

Other services or organizations represented in the comment survey include rental property owners; services for seniors; fair housing; government; services for persons with disabilities; food pantries; drug or alcohol rehabilitation; services for veterans; economic development; education; land use/planning; services for people with HIV/AIDS; services for immigrants; and services for refugees.

Greatest unmet housing needs. Figure III-1 presents the top three housing priority needs identified by participants in the 2016 Action Plan development and review process. The difference in top three priority housing needs between the in-person and online listening opportunities reveal how some needs vary regionally, as demonstrated by migrant/seasonal farmworker housing’s rising to the top in the in-person sessions, but ranking near the bottom when needs are evaluated on a statewide basis. Both regionally and statewide, participants identified owner occupied repair and demolition of blighted housing among the top priority needs. The greatest unmet housing need identified in the comment survey is the same as the greatest need from the 2015 survey—housing for persons at 30 percent of AMI or less.

Figure III-1.
Top Three Housing Priority Needs

2016 Public and Stakeholder Consultation	2013-2015 Public and Stakeholder Consultation
Listening Sessions <ol style="list-style-type: none"> ① Migrant/seasonal farmworker housing ② Owner occupied repair ③ Demolition of blighted housing 	2015 Stakeholder Survey <ol style="list-style-type: none"> ① Housing for persons at 30% AMI or less ② Housing rehabilitation for low income homeowners ③ Housing for persons at 60% AMI or less
Listening Survey <ol style="list-style-type: none"> ① Owner occupied repair ② Affordable housing ③ Demolition of blighted housing 	2014 Stakeholder Survey <ol style="list-style-type: none"> ① Housing for persons at 30% AMI or less ② Emergency shelter for homeless ③ Housing rehabilitation for low income homeowners
Comment Survey <ol style="list-style-type: none"> ① Housing for persons at 30% AMI or less ② Housing for persons at 80% AMI or less ③ Housing for persons at 60% AMI or less 	2013 Stakeholder Survey <ol style="list-style-type: none"> ① Housing for seniors ② Housing rehabilitation for low income homeowners ③ Homeownership opportunities for low income residents

Source: BBC Research & Consulting from 2016 Listening Sessions, 2016 Listening Survey, 2016 Comment Survey, 2013 and 2014 Action Plan stakeholder surveys and the 2015-2019 Consolidated Plan Stakeholder Survey.

Greatest unmet community development needs. Participants in the 2016 Action Plan listening sessions and listening survey explored three aspects of community development needs—those related to economic development, infrastructure and general quality of life improvements. Figure III-2 presents the top three priority community development needs identified. The top priority in quality of life is downtown revitalization; sidewalk improvements in the infrastructure category; and in-person participants prioritized business attraction as the top economic development priority while online participants identified workforce development.

Figure III-2.
Quality of Life, Infrastructure and Economic Development Top Three Priority Needs
2016 Listening Sessions and Survey

Listening Sessions	Listening Survey
Quality of Life <ol style="list-style-type: none"> ① Downtown revitalization ② Façade improvements ③ Parks/swimming pool 	Quality of Life <ol style="list-style-type: none"> ① Downtown revitalization ② Trails/connectivity ③ Façade improvements
Infrastructure <ol style="list-style-type: none"> ① Sidewalk improvements ② Stormwater ③ Road improvements 	Infrastructure <ol style="list-style-type: none"> ① Sidewalk improvements ② State road improvements ③ Bridges
Economic Development <ol style="list-style-type: none"> ① Business attraction ② Brownfield redevelopment ③ Workforce development 	Economic Development <ol style="list-style-type: none"> ① Workforce development ② Business attraction ③ Brownfield redevelopment

Source: BBC Research & Consulting from 2016 Listening Sessions and 2016 Listening Survey.

Historically and in the 2016 Action Plan comment survey, stakeholders identified the top community development priorities from a broad list encompassing all aspects of community development. Figure III-3 compares the top three greatest unmet community development needs identified by stakeholders in 2013, 2014, 2015 and 2016. In each of the four comparison years, public transit for all and job training programs were among the top three greatest unmet needs. In 2016, the third greatest unmet community development need selected was energy efficiency technical assistance.

Figure III-3.
Greatest Unmet Community Development Needs for 2013 to 2016

Note:

More than one-fifth of stakeholders ranked these as the Greatest Unmet Community Development Needs.

Source:

BBC Research & Consulting from 2016 Comment Survey, 2013 and 2014 Action Plan stakeholder surveys and the 2015-2019 Consolidated Plan Stakeholder Survey.

2016 Comment Survey <ol style="list-style-type: none"> ① Public transit for all ② Job training programs ③ Energy efficiency technical assistance
2015 Stakeholder Survey <ol style="list-style-type: none"> ① Public transit for all ② Job training programs ③ Sidewalks
2014 Stakeholder Survey <ol style="list-style-type: none"> ① Job training programs ② Public transit for all ③ Sidewalks
2013 Stakeholder Survey <ol style="list-style-type: none"> ① Public transit for all ② Job training programs ③ Water and sewer infrastructure

Increasing program effectiveness. Stakeholders responding to the comment survey provided advice on how the state can increase the effectiveness of its housing and community development programs. This section reports on the feedback from stakeholders.

What advice do you have for the state to be able to increase the effectiveness of its housing programs?

- “Continue to base policy on research and evidence, which may require adaptations over time to reflect new research findings.”
- “Consistency in housing programs application process. Every program has very similar eligibility requirements, and requires the same documentation; however there are dozens of versions of applications used statewide.”
- “I think most needs are being met but there is so much paperwork requirements that it takes a lot more admin to process the grant than to complete the actual rehab project.”
- “If you don't already, don't make the same guidelines for the entire state. Make them for each community.”
- “Increase support to help organizations maintain capacity by offering higher admin allocations or operating grants.”

What would you do differently?

- “Establish regular grant application cycles to help organizations plan.”
- “Education! Educate state leaders in the reality of rural poverty and get people who are chronically homeless housed. Raise awareness about the CDC's ACE's study and the cycle of poverty, addiction and homelessness to be seen as an effect directly caused by neglect, abuse, and trauma. One cannot simply pull oneself up by their boot straps nor can they be expected to juggle and manage all middle class business matters (such as having a check book to mail a check to pay for HIP 2.0) when they are suffering from a cumulative trauma just existing in poverty.”
- “Empower people to get new job skills so that they can earn more and afford rent. Limit the length of time in some instances that a person can reside in subsidized housing.”
- “Not utilize HMIS. Reporting from this system is inaccurate. It is a time consuming process, with ineffective outcomes.”
- “Offer a credit deferral program (similar to a defensive driving class or check deception deferral program) which requires attendees to complete a set amount of hours in budgeting and utility saving ideas in exchange for payment of back utilities. Or face a consequence. Having good credit should be taken more seriously versus taking advantage of young families lack of knowledge.”

If your change was made, how do you think it will positively impact outcomes?

- “More time could be spent providing case management, skills building, with clients.”

- “Organizations may be able to build more partnerships and impact communities in a more comprehensive manner.”
- “I think community members would become more sensitive to understanding why their neighbors struggle.”
- “Offering free education in finances and budgeting with incentives could give families another chance to gain housing.”
- “While it may be more complicated to administer, it helps people transition better from not paying anything or paying a little to paying closer to market rates. The reality is that many Hoosier households simply cannot afford market rates given their earnings.”

What advice do you have for the state to be able to increase the effectiveness of its community development programs?

- “Rural, suburban and urban areas have different needs and the programs should reflect the differences.”
- “Match amounts that do not hinder small under 1,000 communities from participation.”
- “I believe job training programs are a vital piece to community development. WorkOne/CWI is probably the lead agency providing these programs and they are simply not effective. I would replace the WorkOne model with a different approach.”
- “Use HOME, CDBG (housing & economic development) funds in targeted strategic developments where each augments the other. I would give the example of using HOME funds to install housing for households at or below 80% MFI; using CDBG to install housing for households between 80%-120% MFI in low/mod census tracts near strong housing markets where business could be entices to locate. Job programs can be created through community service centers to be feeder programs.”

What would you do differently?

- “Keep it simple, not tiered systems, no match changes, simple and straight forward. It can get overwhelming for small communities with all this. If your change was made, how do you think it will positively impact outcomes?”
- “I would try giving workforce development funds directly to businesses so they can directly train potential employees in the skills they need. You would get more buy in from both employers to hire those they now know from training, ensure they are getting the right skills and trainees would hear directly from the employers what skills they need.”

If your change was made, how do you think it will positively impact outcomes?

- “I think you would see a lot more successful hires for people transitioning to a new career path and end up with more highly skilled employees.”

To: Real Estate Department Partners
From: Real Estate Department
Date: February 15, 2016
Re: **2016 Annual Action Plan**

Notice: RED-16-11

Pursuant to 24 CFR part 91.115(a)(2), the State of Indiana wishes to encourage citizens to participate in the development of the State of Indiana Annual Action Plan for 2016. In accordance with this regulation, the State is providing the opportunity for citizens to comment on the 2016 Annual Action Plan draft report, which will be submitted to the US Department of Housing and Urban Development (HUD) on or before May 15, 2016.

The Action Plan defines the funding sources for the State of Indiana's four (4) major HUD-funded programs and provides communities a framework for defining comprehensive development planning. The FY 2016 Action Plan will set forth the method of distribution of funding for the following HUD-funded programs:

- State Community Development Block Grant (CDBG) Program
- Home Investment Partnership Program (HOME)
- Emergency Solutions Grant (ESG) Program
- Housing Opportunities for Persons with AIDS (HOPWA) Program

All members of the public are invited to review the draft Plan prior to submission February 15, 2016 through March 31 2016 during normal business hours of 8:30am to 5:00pm, Monday-Friday, at the Indiana Office of Community and Rural Affairs. A draft Plan will also be available on the IHCDA website (www.in.gov/ihcda) and the OCRA website (www.in.gov/ocra).

Written comments are invited from February 15, 2016 through March 31, 2016, at the following address:

**2016 Annual Action Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027**

Comments may also be directed via e-mail to: afoster@bbcresearch.com.

Persons with disabilities will be provided with assistance respective to the contents of the Consolidated Plan. Interested citizens and parties who wish to receive a free copy of the Executive Summary of the FY 2016 Action Plan or have any other questions may contact the Indiana Office of Community and Rural Affairs at its toll free number 800.824.2476, or 317.233.3762, during normal business hours or via electronic mail at coscott@ocra.in.gov.



Public Hearings for 2016 Annual Action Plan

The State of Indiana wishes to encourage citizens to participate in the development of the State of Indiana's 2016 Annual Action Plan. In accordance with this regulation, the State is providing the opportunity for citizens to comment on the [draft report](#), which will be submitted to the U.S. Department of Housing and Urban Development (HUD) on or before May 15, 2016. Public hearings will take place at five locations on Tuesday, March 22, 2016 from 4:00 pm – 6:00 pm.

Indianapolis

Indiana State Fairgrounds
Discovery Hall, Suite 201
1202 East 38th Street
Indianapolis, IN 46205

Huntington

Purdue Extension Office
Courthouse Annex, Suite 202
354 North Jefferson Street
Huntington, IN 46750

Rensselaer

Purdue Extension Office
2530 North McKinley Avenue Suite 1
Rensselaer, IN 47978

Scottsburg

Purdue Extension Office
1 East McClain Ave., Ste. 30
Scottsburg, IN 47170

Vincennes

Purdue Extension Office
4259 North Purdue Road
Vincennes, IN 47591

Click [here](#) to view a draft of the 2016 Annual Action Plan.

All members of the public are invited to review the draft Plan prior to submission February 15, 2016 through March 31, 2016 during normal business hours of 8:30 am to 5:00 pm, Monday-Friday, at the Indiana Office of Community and Rural Affairs.

Written comments are invited from February 15, 2016 through March 31, 2016, at the following address:

2016 Annual Action Plan
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One North Capitol – Suite 600
Indianapolis, IN 46204-2027

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Presented by:

Heidi Aggeler, Director



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STATE OF INDIANA

2016 Action Plan

Public Hearings — March 22, 2016

Agenda

- **Introductions**
- **What's new in 2016**
- **Public comments and input**



Introduction and Hearing Rules

- **To ensure that everyone in attendance has a chance to voice their opinion and to make sure we can hear all comments:**
 - **Please hold your comments to 3 minutes on each subject. This will give everyone an equal chance to make comments.**
 - **Please do not interrupt or debate others. There are no right or wrong answers in our discussion today.**
 - **If you have more to say, or have very detailed questions about programs, visit with us after the hearing or contact one of us later (contact information is on both the cover and last slide).**

Purpose of the Consolidated Plan

- In 1995, the U.S. Department of Housing and Urban Development (HUD) began requiring states and local communities to prepare a Consolidated Plan in order to receive federal housing and community development funding.
- The purpose of the Consolidated Plan is:
 - To identify a state's housing and community development needs, priorities, goals and strategies.
 - To stipulate how funds will be allocated to state housing and community development non-profit organizations and local governments.
- This is the second Action Plan in the 2015-2019 planning cycle. It continues using HUD's online Consolidated Planning Suite (eCon Plan)

The State of Indiana's Consolidated Plan

■ Five-Year Strategic Plan and Annual Action Plans

- Pertains to specific HUD funding programs:
 - *Community Development Block Grant (CDBG)*
 - *Home Investment Partnerships Program (HOME)*
 - *Emergency Solutions Grant Program (ESG)*
 - *Housing Opportunities for Persons with AIDS (HOPWA)*
 - *Also governs the allocation of CDBG disaster recovery funds received by the State*

What will the State receive from HUD? *(2016 estimated funding allocations)*

CDBG	\$30,000,000
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HOME	\$10,000,000
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ESG	\$3,636,000
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HOPWA	\$969,000
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TOTAL	\$44,605,000
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Annual Goals and Objectives

CDBG funds:

\$2.7 million for owner-occupied rehabilitation (allocated to IHCD)

\$8 million for wastewater/drinking water improvements

\$3.2 million for public facilities improvements (down from \$5 mill)

\$4 million for the Stellar Communities program

\$3.5 million for storm water improvements

\$1.4 million for planning

\$1.4 million for blight clearance

\$1.25 million towards workforce development (up from \$1 mill)

\$1.5 million for Main Street Revitalization (up from \$800,000)

\$660,000 for administration

\$280,000 for technical assistance

Section 108 loan program—up to \$80 million

Annual Goals and Objectives (continued)

CDBG-DR funds:

\$5.34 million for comprehensive revitalization

Annual Goals and Objectives (continued)

HOME funds:

\$3.7 million rental projects (competitive funding)

\$1 million homeownership projects (competitive funding)

\$1 million for Housing First projects (maximum \$500,000 per award) (down from \$1.5 million)

\$2.5 million for Rental Housing Tax Credit/HOME combos under the Qualified Allocation Plan (maximum \$500,000 per award)

\$300,000 for CHDO operating and predevelopment

\$900,000 administrative uses (\$600,000 internal and \$400,000 organizational capacity building)

\$500,000 for tenant-based rental assistance

Annual Goals and Objectives (continued)

ESG funds:

\$1.9 million emergency shelters with operations and essential services

\$1.26 million rental assistance for rapid re-housing

\$139,000 rental assistance associated with homeless prevention

\$90,000 outreach activities

\$164,000 program administration (down from 2015)

Annual Goals and Objectives (continued)

HOPWA funds:

\$440,000 in TBRA

\$220,000 for housing information activities

\$138,000 short-term rental, utilities and mortgage assistance

\$100,000 support facility operations and supportive services

Community Input

Top Housing Priorities

- Listening session = migrant farmer or seasonal farm worker housing and owner-occupied housing rehabilitation.
- Survey respondents = housing priorities similar, with the exception of migrant worker housing. Owner-occupied housing rehabilitation, affordable housing, demolition of blighted housing and upper-story housing. Among online survey participants, migrant farmworker housing was among the two lowest priorities.

Top Infrastructure Priorities

- Both = sidewalk improvements, followed by road improvements, storm and wastewater improvements.

<https://www.research.net/r/IN2016ActionPlan>

Community Input

Top Economic Development Priorities

- Both = workforce development and training, business attraction, brownfield redevelopment and broadband internet.

Top Quality of Life Priorities

- Both = downtown revitalization, trails/connectivity of trails, facade improvements and parks.

Your Input

Consider the 2016 Action Plan:

- **What do you like best? The least?**
- **What questions and comments do you have today?**

How to Comment on the 2016 Action Plan

- Through March 31, 2016 you may send email to:

coscott@ocra.in.gov (Corrie Scott at OCRA)

Send a letter to:

Indiana Office of Community and Rural Affairs
One North Capitol Avenue, Suite 600
Indianapolis, IN 46204-22288

Attn: Consolidated Plan

- Access the draft Plan at:

<http://www.in.gov/ihcda>

OR

<http://www.in.gov/ocra>

Scott, Corrie

From: Kerry Hyatt Bennett <kbennett@icadvinc.org>
Sent: Tuesday, March 29, 2016 1:33 PM
To: Scott, Corrie
Subject: 2016 Action Plan

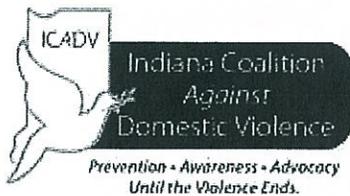
**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Ms. Scott:

ICADV works closely with the Indiana Migrant Farmworkers Coalition as it works to help migrant farmworkers in Indiana. With that in mind, I wish to express, on behalf of ICADV, that the housing conditions in Indiana are terrible for migrant farmworkers; we would very much like to see CDBG funding allocated for migrant/seasonal farmworker housing in the 2016 Action Plan. Please take this consideration seriously, as this is an ongoing concern of thousands. It impacts our economy, it impacts the quality of life for many Hoosiers, and it is purely the right thing to do.

Thank you for your attention to this matter.

Kerry Hyatt Bennett, JD
Legal Counsel



1915 W. 18th Street, Suite B – Indianapolis, IN 46202
317.917.3685 • 800.538.3393 • Video phone 317.644.6206
Fax 317.917.3695
www.icadvinc.org – www.indianasaysnomore.com



RACE AWAY
From Domestic Violence
5K Walk/Run/Wheelchair Roll
Saturday, June 4, 2016
at Indianapolis City Market



Lucky
AT
LUCAS
August 13, 201

I get up every morning determined to both change the world and have one hell of a good time. Sometimes this makes planning my day difficult. E. B. White
US author & humorist (1899 - 1985)

1 Reply

Scott, Corrie

From: Scott, Corrie
Sent: Tuesday, March 29, 2016 1:40 PM
To: 'Kerry Hyatt Bennett'
Subject: RE: 2016 Action Plan

Dear Kerry Hyatt Bennett,

Thank you for expressing your interest in the 2016 Action Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2016 Consolidated Plan to the U.S. Department of Housing and Urban Development.

Please feel free to contact our office should you have any questions.

Sincerely,
Corrie

Corrie Scott, CAP-OM



Administrative Assistant
Office of Community and Rural Affairs
Desk: 317.233.3762
Email: coscott@ocra.in.gov
Follow us on [Twitter](#) and [Facebook](#).

From: Kerry Hyatt Bennett [mailto:kbennett@icadvinc.org]
Sent: Tuesday, March 29, 2016 1:33 PM
To: Scott, Corrie
Subject: 2016 Action Plan

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Ms. Scott:

ICADV works closely with the Indiana Migrant Farmworkers Coalition as it works to help migrant farmworkers in Indiana. With that in mind, I wish to express, on behalf of ICADV, that the housing conditions in Indiana are terrible for migrant farmworkers; we would very much like to see CDBG funding allocated for migrant/seasonal farmworker housing in the 2016 Action Plan. Please take this consideration seriously, as this is an ongoing concern of thousands. It impacts our economy, it impacts the quality of life for many Hoosiers, and it is purely the right thing to do.

Thank you for your attention to this matter.

Kerry Hyatt Bennett, JD
Legal Counsel



March 28, 2016

2016 Annual Action Plan
 Indiana Office of Community and Rural Affairs
 One North Capitol—Suite 600
 Indianapolis, IN 46204

Dear Sir or Madam:

The Indiana Migrant and Seasonal Farmworker Coalition (IMSFC) is a collaborative effort of organizations and agencies that, in some manner, serve migrant and seasonal farmworkers in Indiana. Our members include representatives from the Indiana Department of Health and Safety, the Department of Workforce Development, U.S. Departments of Labor and Education, Migrant Education and Legal Services.

On behalf of over 26,000 migrant and seasonal agricultural workers in Indiana, our Coalition strongly urges the state of Indiana to restore funding for migrant farmworker housing in the 2016 Annual Action Plan. We speak on behalf of Indiana migrant farmworkers in part because these workers spend 12-hour days in the fields and cannot access public hearings. Most migrant farmworkers have limited English proficiency (LEP) and they do not have the ability to submit written comments online. Only 39% have schooling beyond the ninth grade, and only 33% of agricultural workers report they can speak English “well.”¹ Our Coalition submits this letter on behalf of thousands of migrant farmworkers who live and work in Indiana but effectively have no voice in the 2016 Consolidated Action Plan.

The statistics vary on the numbers of migrant and seasonal farmworkers in Indiana. According to the National Center for Farmworker Health, Indiana’s migrant and seasonal farmworker population ranges from 7,716 to 30,299.² This range comes from two studies using different methodologies to come up with different numbers. The 1990 Atlas of Migrant and Seasonal Farmworkers and the 1993 Farmworker Enumeration Study are the two most common studies used by researchers when trying to determine the number of farmworkers within a given state.³ More recent population estimates have been put forth by the Legal

¹ U.S. DEPT OF LABOR, EMP’T & TRAINING ADMIN., NATIONAL AGRICULTURAL WORKERS SURVEY (NAWS), PUBLIC DATA SETS, <http://www.doleta.gov/agworker/naws.cfm> (last visited Mar. 28, 2016) and U.S. CENSUS BUREAU, 2012 AMERICAN COMMUNITY SURVEY 1-YEAR ESTIMATES (cited by LSC Report, *infra* note 4).

² “Migrant and Seasonal Farmworker Demographics,” 2009, NATIONAL CENTER FOR FARMWORKER HEALTH (NCFH), <http://www.unctv.org/content/sites/default/files/0000011508-fs-Migrant%20Demographics.pdf> (last visited Mar. 28, 2016).

³ NCFH, *supra* note 2.

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 Community &
 Rural Affairs

reliance on the employer for housing exacerbate agricultural workers' vulnerability to exploitation. When forced to find housing on their own, migrant farmworkers often find themselves in a cost burdened situation, where over 30% of their income goes to pay for housing. Farmworkers are ineligible for over-time, and many earn only minimum wage with no benefits.

Cost is not the only burden farmworkers face when it comes to housing. Geography is an additional barrier that can lead to overcrowding. The Housing Assistance Council has reported that 31% of agricultural workers live in crowded housing, over six times higher than the national average, and that "substandard and structurally deficient conditions are endemic to farmworker housing."¹³ Based on a review of the occupational safety and health research programs addressing agricultural workers, the National Research Council reported that "virtually all recent health survey research have [sic] demonstrated that a large share of this workforce is still experiencing unwarranted risks to health that are associated with their housing conditions."¹⁴ Even when some form of housing is available, migrant farmworkers will frequently have to travel over an hour to and from the fields where they work every day.

It is our mission to work together to improve the quality of life for migrant and seasonal farmworkers in Indiana. With the information provided above, we urge you to carefully consider our request to restore funding for migrant farmworker housing in the 2016 Annual Action Plan.

Respectfully Submitted,
Kristin Hoffman



IMSFC, Chair
Kristinhoffman21@gmail.com

¹³ HOUS. ASSISTANCE COUNCIL, HOUSING CONDITIONS FOR FARMWORKERS 6-7 (Rural Research Rep. Sept. 2013) (cited by LSC Report, *supra* note 4). The 31% crowded measures exclude barracks and dormitories that are designed for high occupancy.

¹⁴ VILLAREJO ET AL., *supra* note 11 at 6 (cited in LSC Report, *supra* note 4)

2 Reply

Scott, Corrie

From: Scott, Corrie
Sent: Thursday, March 31, 2016 3:11 PM
To: 'Kristin Hoffman'
Subject: RE: 2016 Action Plan

Dear Kristin,

Thank you for expressing your interest in the 2016 Action Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2016 Consolidated Plan to the U.S. Department of Housing and Urban Development.

Please feel free to contact our office should you have any questions.

Sincerely,
Corrie

Corrie Scott, CAP-OM



Administrative Assistant
Office of Community and Rural Affairs
Desk: 317.233.3762
Email: coscott@ocra.in.gov
Follow us on Twitter and Facebook.



We provide farmworkers, immigrants, and others, with a variety of services that improve their health, education, and economic opportunities.

March 25, 2016

2016 Annual Action Plan

Indiana Office of Community and Rural Affairs

One North Capitol—Suite 600

Indianapolis, IN 46204



709 S. Reed Road
Kokomo, IN 46901

Phone: 765-450-4270
Toll Free: 1-855-765-6687
Fax: 765-450-4278

Randall Collins, MSM
Regional Director
RandallC@proteusinc.net

www.proteusinc.net
Cell: 765-243-1622

Dear Indiana Office of Community and Rural Affairs:

Seasonal and migrant farmworkers provide an invaluable, life-sustaining service to Indiana residents. Their hard work is vital in maintaining the most basic quality of life, while contributing billions of dollars to our economy.

On behalf of the workers who are truly the ‘heart’ of the heartland; I implore you to restore funding for Indiana’s migrant seasonal housing in the 2016 Annual Action Plan.

Each year, migrants come to Indiana to plant and harvest food crops. Eighty-five percent of our fruits and vegetables are still handpicked. Apples, watermelon, tomatoes, peppers and green beans are some of the produce that we all enjoy thanks to their hard work.

The Indiana Migrant and Seasonal Farmworker’s Coalition (IMSFC), is a collaboration of organizations and agencies in the state that serve the agricultural population in various capacities. Members include: Representatives from the Indiana Department of Health and Safety, the Department of Workforce Development, the Department of Labor and Education, Migrant Education, Legal Services and Proteus, Inc.

We collectively utilize our community influence to serve as a platform for the over 65,000 year-round farmworkers who do not have a voice.

Migrant workers particularly face insurmountable barriers.

Most of them have limited English proficiency (LEP), effecting their ability to communicate with the majority. In addition, their 12 hour work days do not permit time to attend public hearings to express concerns.

Corporate Headquarters

Des Moines • 3850 Merle Hay Road, Suite 500 • Iowa 50310-1322 • (515) 271-5303 • (800) 372-6031 • Fax (515) 271-5309

Indiana Offices

Kokomo • 709 South Reed Road • Indiana 46901 • (765) 450-4270 • (855) 765-6687 • Fax (765) 450-4278

South Bend • 851 Marietta Street • Indiana 46601 • (765) 855-5326

Vincennes • 1500 North Chestnut Street Room 132 • Indiana 47591 • (812) 882-0092

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Community & Rural Affairs



*We provide farmworkers, immigrants, and others,
with a variety of services
that improve their health, education,
and economic opportunities.*

Upon entering the state, migrants are forced to navigate unfamiliar territory and find their own housing. They are also burdened with unaffordable boarding costs, spending thirty percent of their income on housing alone!

Additionally, some reside over an hour away from where they work.

Many of the on farm housing units are uninhabitable. They are nothing more than concrete walls, with no running water, heat or air conditioning.

The need for funding for farmworker housing is evidenced by such examples.

In 2015, our coalition member's encountered over 1,000 corn detasslers in Northern Indiana staying in dilapidated motels being used as unlicensed labor campus. Many were forced to share space (even beds) with strangers!

In Southern Indiana, Knox County, workers slept in their vans due to unavailable housing. A group of migrants in Jackson County were subjected to sleeping on the laundry room floor.

You have the power to make substantial impact!

Restoring funding will help our farmworkers enjoy favorable living conditions, and experience a better quality of life.

Their work is essential to *our* quality of life.

Respectfully,

Randall Collins

Indiana Proteus Regional Director

National Farmworker Jobs Program, (NFJP) Indiana Grantee for the U.S. Department of Labor

Corporate Headquarters

Des Moines • 3850 Merle Hay Road, Suite 500 • Iowa 50310-1322 • (515) 271-5303 • (800) 372-6031 • Fax (515) 271-5309

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IF YOU HAVE BEEN EMPLOYED IN AGRICULTURE IN THE PAST 2 YEARS WITH:

- BALING HAY
- COMBINING
- POULTRY FARMING
- RAISING LIVESTOCK
- DETASSELING CORN
- PICKING FRUIT
- SHEARING SHEEP
- WALKING BEANS
- PLANTING CROPS
- SOD FARMING
- VEGETABLE FARMING
- OTHER FARMING JOBS

YOU COULD QUALIFY FOR:

- EARN \$5 PER CLASSROOM HOUR
- MILEAGE REIMBURSEMENT
- TUITION ASSISTANCE
- ASSISTANCE WITH TOOLS/UNIFORMS/SUPPLIES
- MONTHLY COMMODITIES
- HELP WITH MINOR CAR REPAIRS

OUR OFFICES:

Kokomo, Indiana

709 S. Reed Rd.
Kokomo, Indiana 46901
Toll Free: (855) 765-6687
(765) 450-4270

South Bend, Indiana

851 Marietta Street
South Bend, Indiana 46601
(574) 855-5326

Vincennes, Indiana

1500 N. Chestnut Street
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Vincennes, Indiana 47591
(812) 882-0092

Columbus, Indiana

4555 Central Ave.
Columbus, Indiana 47203
(812) 314-8584

Visit us at www.proteusinc.net and  Facebook.

Partnering with



WorkOne

Funding provided by the United States Department of Labor, Migrant and Seasonal Farmworker Program Under Title 1, Section 167 of the Workforce Innovation and Opportunity Act (WIOA) of 2014. Proteus, Inc. shall not engage in or allow discrimination covered by law. This includes harassment, based on race, color, national origin, creed, religion, gender, sexual orientation, age, gender identity or disability. Individuals who believe they have been discriminated against may contact the Proteus, Inc. EEO officer at (800) 372-6031. TDD/TTY service provider Relay Iowa (English) 800-735-2943, (Español) 800-264-7190.

WHO WE ARE

Our Mission:
We provide communities health, educational and economic opportunities.



Now That You Know How Proteus Can Help ...

Take the Next Step
Toward a Better Future

OUR OFFICES:

Kokomo, Indiana

709 S. Reed Rd.

Kokomo, Indiana 46901

Toll Free: (855) 765-6687

(765) 450-4270

South Bend, Indiana

851 Marietta Street

South Bend, Indiana 46601

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Columbus, Indiana 47203

(812) 314-8584

Funding provided by the United States Department of Labor, Migrant and Seasonal Farmworker Program Under Title 1, Section 167 of the Workforce Innovation and Opportunity Act (WIOA) of 2014.

Visit us online to learn more about our programs:

www.proteusinc.net



Find us on:
facebook®

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Better Jobs.
A Better Future.



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WHO WE ARE

Proteus, Inc. may be Iowa's best-kept secret. We are a private not-for-profit corporation that, since 1979, has provided a variety of essential services to low-income Iowans, primarily farmworkers.

Our Worker Outreach

The men and women who work on Iowa's farms care for the livestock and the crops that feed our nation and the world. Yet all too often many get stuck in this cycle of low pay, substandard working and living conditions, and the ever-uncertain employment prospects that come with seasonal work.

Proteus provides the services and financial assistance that can help these farmworkers—as well as those who have worked in a nursery, greenhouse, or winery—qualify for better jobs and enjoy a higher standard of living.

Our Extended Outreach

Proteus also serves Iowa's immigrant and other minority and low-income populations. We work to make their dream of a brighter tomorrow a reality by helping them overcome language and cultural barriers so they can better provide for their families.

THE MANY WAYS PROTEUS CAN HELP

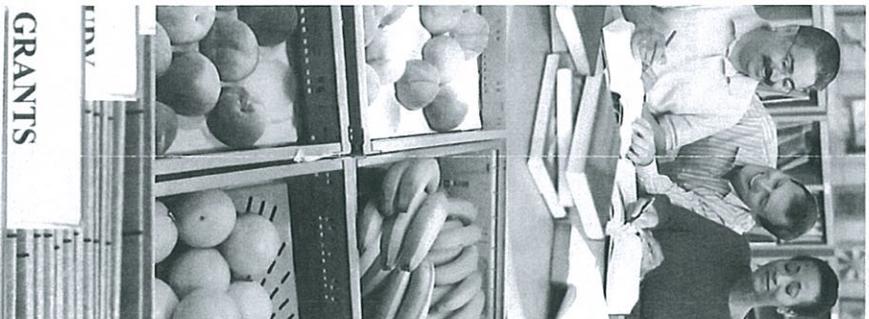
1 EDUCATIONAL SERVICES. We assess clients' skills and provide up to two years of educational services, English as a Second Language (ESL) instruction, and General Education Development (GED) preparation for those who need it.

2 ON-THE-JOB TRAINING. (OJT) is provided through arrangements with private employers.

3 CAREER PLACEMENT SERVICES. Proteus case managers help match clients with suitable employers at no cost to either party.

4 RELATED ASSISTANCE. Based upon need, clients can receive financial assistance to help pay for expenses necessary to their training and financial need, such as child care and car repairs.

5 MIGRANT HEALTH SERVICES. Eligible clients can access primary health care services through clinics, home visits,



and referrals to contracted local community health care providers.

6 HOMELESS PROJECT SERVICES. Bilingual case managers help clients retain housing for their families.

7 PROMOTORAS PROGRAM. Promotoras are community members who promote health in their own communities. They provide leadership, peer education, support, and resources to support community empowerment. As members of a minority and/or an underserved population they are in a unique position to build on strengths and to address unmet health needs in their own community.



8 FOOD & CLOTHING ASSISTANCE. Each of the three Iowa Proteus offices operates a food pantry & clothing closet that distributes staples to families in need.

3-Reply

Scott, Corrie

From: Scott, Corrie
Sent: Thursday, March 31, 2016 3:12 PM
To: 'randallc@proteusinc.net'
Subject: RE: 2016 Action Plan

Dear Randall,

Thank you for expressing your interest in the 2016 Action Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2016 Consolidated Plan to the U.S. Department of Housing and Urban Development.

Please feel free to contact our office should you have any questions.

Sincerely,
Corrie

Corrie Scott, CAP-OM



Administrative Assistant
Office of Community and Rural Affairs
Desk: 317.233.3762
Email: coscott@ocra.in.gov
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Empowering People with Disabilities
in Southwest Indiana

4

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
1 North Capitol – Suite 600
Indianapolis, In 46204-2027

afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

I would like to thank you for the opportunity to comment on the 2016 Consolidated Action Plan. I am employed by ATTIC, an independent living center based in Knox county which provides services to 8 counties in southern Indiana. I am also a committee member for the Back Home Indiana Alliance. In working with persons with disabilities and their housing issues, there are issues needing to be addressed regarding availability of affordable, accessible and integrated housing for persons with disabilities and senior citizens as well. These issues could be improved through increased opportunities to rent or purchase a home, and with increased home modification initiatives.

#1 Accessible Units Not Rented By Persons with Disabilities.

Recent meetings with owners and property management representatives of tax credit and HUD funded housing developments it has been noted that it's not uncommon to have non-disabled persons renting the accessible units.

A lack of marketing for the accessible units is assumed to be a contributing factor to persons using wheelchairs not renting these units. Also, a major issue is the lack of affordability of these units for tenants with incomes of 20% to 30% AMI. Without rental subsidies for persons who use wheelchairs, they are continuing to be priced out of housing specifically designed to accommodate their needs.

Recommendation: Rental subsidies must be attached to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units should be affordable at 20% or below AMI.

#2 MFP and Housing

To date, the DOA (Indiana Dept. of Aging) and the associated MFP (Money Follows the Person) have had limited transition outcomes to integrated housing & community based supports for persons transitioning out of nursing homes. Although IHCDA provided a Housing Choice Voucher preference for MFP

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ATTIC, Inc.

1721 Washington Avenue | Vincennes, Indiana 47591 | Toll-free 877.962.8842 | V/T 812.886.0575 | Fax 812.886.1128 | www.atticindiana.org



Empowering People with Disabilities
in Southwest Indiana

participants, DOA has largely not assisted any of their constituents to help them access these rental subsidies.

The DOA and MFP leadership shifted in Jan. 2016 and with that has come a more articulated commitment to facilitating increased opportunities for integrated and affordable housing & community based support systems.

Recommendation: Hold fast to IHCDA's leadership role in their implementing of Olmstead and the deinstitutionalization of persons with disabilities of all ages.

#3 Homeownership is Out of Reach.

Ground has been lost in Indiana's homeownership opportunities for persons with disabilities and low incomes during the recent housing crisis. The IHCDA Section 8 Homeownership Program and the \$10,000 in down payment assistance for persons with disabilities were both eliminated.

Recommendation:

#1 Re-establish the Section 8 Homeownership Program within the IHCDA Single Family Housing Department.

#2 Re-establish up to \$10,000 in down payment assistance for persons with disabilities and low incomes to help assure participation in affordable home ownership opportunities.

Lastly, it's important to acknowledge the first outcomes of these newly established incentives for *integrated supportive housing* within the Low Income housing Tax Credit program. It's wonderful to see housing developers step forward with community partners to establish the first two integrated supported housing models developed in Valparaiso and Indianapolis.

As always, we look forward to continuing to work with you on these important issues.

Thank you for this opportunity.

Cindy Cox
Independent Living Coordinator
ATTIC 1721 Washington Ave.
Vincennes, In 47591
cindy@atticindiana.org

H. Reply

Scott, Corrie

From: Scott, Corrie
Sent: Thursday, March 31, 2016 3:01 PM
To: 'Cindy Cox'
Subject: RE: 2016 Action Plan

Dear Cindy,

Thank you for expressing your interest in the 2016 Action Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2016 Consolidated Plan to the U.S. Department of Housing and Urban Development.

Please feel free to contact our office should you have any questions.

Sincerely,
Corrie

Corrie Scott, CAP-OM



Administrative Assistant
Office of Community and Rural Affairs
Desk: 317.233.3762
Email: coscott@ocra.in.gov
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APR 01 16

Community &
Rural Affairs

Scott, Corrie

From: Hong, Youngbok <youhong@iupui.edu>
Sent: Thursday, March 31, 2016 5:25 PM
To: Scott, Corrie
Subject: Comments on the 2016 Consolidated Plan
Attachments: letter of support_youngbok.pdf; ATT00001.htm

Importance: High

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

Dear Committee,
Please accept the attached letter.
If you have any questions regarding the excerpts in the letter, please let me know.

Sincerely,

Youngbok Hong

Associate Professor
Visual Communication Design

Graduate Program Director
Design Thinking and Design Leadership

Herron School of Art and Design
Indiana University, IUPUI
735 New York St
Indianapolis, IN 46202
317- 278 -9475

March 31, 2016

2016 Annual Action Plan
Indiana Office of Community and Rural Affairs
One North Capital, Suite 600
Indianapolis, IN 46204

Dear Indiana Office of Community and Rural Affairs,

I conducted the needs assessment of seasonal and migrant farmworkers during the summer of 2014. My team interviewed more than 50 individuals. In order to assist your decision, here I have included the excerpts from their interviews. I used pseudonyms to protect their identity. Hopefully, this information provides the committee a real sense of their challenges and helps facilitate your reconsideration of restoring funding for their housing. Please contact me if you have any questions.

#1

Alberto comes to Indiana from his home in Florida. His wife, Maria accompanies him, while he works detasseling corn. During their three-week stay in Indiana, their home is a motel where about 300 other workers, mostly males, also stay. After detasseling season in Indiana, they plan to move to Michigan for apple picking season. Maria is pregnant and has not yet seen a Doctor. She does not know how far along she is in her pregnancy. Although they have Medicaid in Florida, it takes at least three weeks to have service transferred to a different state. Considering the constant relocation, it does not make sense to transfer services each time they move. They may not return to Florida in time to receive care before her due date.

#2

Although promised, the labor contractor has not provided food or consistent, nor adequate pay. According to the hours he works and amount he is being paid, he is earning .70 cents per hour. Matthieu is staying in an overcrowded hotel with up to 7 workers per room. Men and women who are strangers to one another are forced to share beds. Some workers are subjected to sleeping on mattresses in the laundry room of the motel. Matthieu has not eaten in over a day and is exhausted from his long work hours.

#3

Their bodies are covered with oozing, scabbed over bedbug bites. The infestation is so extreme that they are unable to sleep at night. They ask the housing manager to treat their barracks for bedbugs, but they are told, "stop being babies and be men". Unable to sleep, they have taken to collecting all the bedbugs they could find and placing them in a jar to remove as many as possible. At least these bedbugs won't bite them. The workers make a trip to Wal-Mart to purchase bug spray in hopes that it will rid them of the bedbugs.

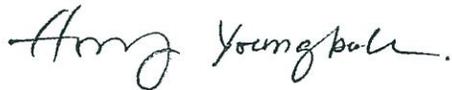
#4

It is about 9:30pm when the workers begin to file off the bus and make their way to the barracks. There are approximately 150 workers at the camp and only ten of them are women. All of the workers quickly exit the bus exhausted and hungry from a workday that began when the sun rose. Everyone quickly disappears into their rooms to prepare for

dinner, except the group of 10 women. The ten women share the same room and all of them are undocumented. The men walk to their rooms let themselves in with their keys. The women wait outside their locked door. Finally the labor contractor, previously accused of trafficking individuals, takes the women's room key out of his pocket and opens the door before placing their key back into his pocket.

#5

The camp is an old school that has been re-purposed to house about 300 migrant farm workers for the month of July. It sits in a mosquito-infested field wrapped in barbed wire. The front lawn is filled with at least 30 port-o-pots on trailers. The contractor only hires men, because he cannot guarantee safety for any women present, even for a short visit.

A handwritten signature in black ink that reads "Youngbok Hong". The signature is written in a cursive, flowing style.

Youngbok Hong

Associate Professor
Visual Communication Design

Graduate Program Director
Design Thinking and Design Leadership

youhong@iupui.edu
317- 278 -9475

Herron School of Art and Design
Indiana University, IUPUI
735 New York St
Indianapolis, IN 46202

5-Reply

Scott, Corrie

From: Scott, Corrie
Sent: Friday, April 01, 2016 3:19 PM
To: 'Hong, Youngbok'
Subject: RE: Comments on the 2016 Consolidated Plan

Dear Youngbok Hong

Thank you for expressing your interest in the 2016 Action Plan.

Although your comment was received after the comment period, please be assured that all comments will be reviewed and considered as we continue this process and submit the 2016 Action Plan to the U.S. Department of Housing and Urban Development.

Please feel free to contact our office should you have any questions.

Sincerely,
Corrie

Corrie Scott, CAP-OM



Administrative Assistant
Office of Community and Rural Affairs
Desk: 317.233.3762
Email: coscott@ocra.in.gov
Follow us on Twitter and Facebook.

From: Hong, Youngbok [mailto:youhong@iupui.edu]
Sent: Thursday, March 31, 2016 5:25 PM
To: Scott, Corrie
Subject: Comments on the 2016 Consolidated Plan
Importance: High

Dear Committee,
Please accept the attached letter.
If you have any questions regarding the excerpts in the letter, please let me know.

Sincerely,

Youngbok Hong

Associate Professor
Visual Communication Design

Graduate Program Director
Design Thinking and Design Leadership

Herron School of Art and Design

RECEIVED

APR 01 16

Community &
Rural Affairs

Scott, Corrie

From: Matthew Fuss <fuss.matthew@gmail.com>
Sent: Thursday, March 31, 2016 7:50 PM
To: Scott, Corrie
Subject: housing conditions in Indiana

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. **** _____

The housing conditions in Indiana are terrible for migrant farmworkers, and I would like to see CDBG funding allocated for migrant/seasonal farmworker housing in the 2016 Action Plan.

I have visited farmworkers where they live throughout Indiana. I was appalled to see living conditions reminiscent of a third world country. If consumers knew that the fruits and vegetables they were buying were connected to such conditions, there would certainly be a larger outcry.

Thank you for taking the time to read my comment.

Regards,

Matthew Fuss

6 - Reply

Scott, Corrie

From: Scott, Corrie
Sent: Friday, April 01, 2016 3:20 PM
To: 'Matthew Fuss'
Subject: RE: housing conditions in Indiana

Dear Matthew,

Thank you for expressing your interest in the 2016 Action Plan.

Although your comment was received after the comment period, please be assured that all comments will be reviewed and considered as we continue this process and submit the 2016 Action Plan to the U.S. Department of Housing and Urban Development.

Please feel free to contact our office should you have any questions.

Sincerely,
Corrie

Corrie Scott, CAP-OM



Administrative Assistant
Office of Community and Rural Affairs
Desk: 317.233.3762
Email: coscott@ocra.in.gov
Follow us on Twitter and Facebook.

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

The housing conditions in Indiana are terrible for migrant farmworkers, and I would like to see CDBG funding allocated for migrant/seasonal farmworker housing in the 2016 Action Plan.

I have visited farmworkers where they live throughout Indiana. I was appalled to see living conditions reminiscent of a third world country. If consumers knew that the fruits and vegetables they were buying were connected to such conditions, there would certainly be a larger outcry.

Thank you for taking the time to read my comment.

Regards,

Matthew Fuss



7
RECEIVED
APR 01 16
Community &
Rural Affairs

March 29, 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority

2016 Action Plan
Indiana Office of Community and Rural Affairs
1 N Capitol Ste 600
Indianapolis, IN 46204-2288

Dear Mr. Sipe and Ms. Foster:

My name is Jackie Evans and I am an Independent Living Coordinator with ATTIC, Inc. out of Vincennes Indiana Knox County. We assist consumers with achieving many goals with one being housing. We have partnered with Back Home in Indiana Alliance for many years, and we agree with them on issues concerning our consumers.

1. Support the enhanced education of architects, designers, developers and builders on accessibility requirements to meet Fair Housing accessibility standards and enforce compliance with these standards in all federally funded multi-family housing units which are funded in part through IHCDA.

The Fair Housing Center of Central Indiana released a report in April 2013 that showed a high percentage of multi-family housing in central Indiana was found to be mostly non-compliant with the Fair Housing Accessibility Standards. It can be safe to assume that many properties throughout Indiana may also have similar compliance issues.

2. Hold fast to the commitment to assure that persons with disabilities and older adults living in nursing homes and affiliated with the Indiana Money Follows the Person (MFP) program have access to integrated, affordable housing through the IHCDA Section Housing Choice Voucher program.

Thank you Mr. Sipe and IHCDA for your continued support and leadership in the deinstitutionalization movement and the implementation of the Olmstead Act through the allocation of the housing vouchers.

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APR 01 16
Community &
Rural Affairs



3. Re-establish increased down payment assistance for persons with disabilities and low incomes to assure participation in affordable home ownership opportunities.

It would be wonderful to see this program re-established. There are growing numbers of people with disabilities who are unable to dwell in rental properties due to a lack of accessible units. It would also be beneficial to see it become a threshold requirement that non-profit organizations like Habitat for Humanity be required to accept Section 8 vouchers for down payments. This could increase affordability and the families served by Habitat for humanity as well.

We concur that the following recommendations be incorporated into the Action Plan:

Recommendation 1: Rental subsidies must be tied to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI.

Recommendation 2: Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing, which means people with and without disabilities in the same development, is needed.

We want to thank you for all the good needs that have already been accomplished. As the requirements for visitable designs and the improvement of universal design features in affordable rental housing.

Thank you for this opportunity for our output and am looking forward to continuing to work with you.

Jackie Evans
Independent Living Coordinator

7 - Reply

If you have questions or need our assistance, please contact us.

ATTIC, Inc.
1721 Washington Avenue
Vincennes, Indiana 47591
Voice/TTY: 812-886-0575
Toll-Free: 877-962-8842
Fax: 812-886-1128

Or, you can use this form:

Your Name (required)

Corrie Scott

Your Email (required)

coscott@ocra.in.gov

Subject

Response to Jackie Evans

Your Message

Dear Jackie,
Thank you for expressing your interest in the 2016 Action Plan.

Although your comment was received after the comment period, please be assured that all comments will be reviewed and considered as we continue this process and submit the 2016 Action Plan to the U.S. Department of Housing and Urban Development.

Please feel free to contact our office should you have any questions.

Sincerely,
Corrie K. Scott, CAP-OM
Indiana Office of Community and Rural Affairs
317-233-3762
One N. Capitol Ave., Ste. 600
Indianapolis, IN 46204

Send

March 27, 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
30 S. Meridian, Suite 1000
Indianapolis, IN 46204

Dear Mr. Sipe:

Thank you for IHCD's efforts to improve housing opportunities for persons with disabilities. We, as a Center for Independent Living, particularly appreciate the progress made regarding visitable design in affordable rental housing, and the Ramp Up program.

As the Action Plan is finalized for 2016 it is important to continue to improve upon Indiana's affordable housing opportunities. The League is in agreement with others who see room for continuing the progress that has been made by addressing issues with the plan draft and offering recommendations to address these issues. These are as follows:

Issue #1. Accessible Units Not Rented By People with Disabilities. It is apparently not uncommon to have persons who do not need the accessible units renting these units. The lack of marketing the accessible units to people with disabilities is assumed to be a contributing factor to persons using wheelchairs not renting these units. In addition, a major barrier is the lack of affordability of these units for tenants with incomes of 20% - 30% AMI. Without rental subsidies people who use wheelchairs are continuing to be priced out of housing designed specifically to best accommodate their needs.

Recommendation #1: Rental subsidies must be tied to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI.

Issue #2: MFP and Housing. To date, the Indiana Department of Aging (DOA) and the associated Money Follows the Person (MFP) have had limited transition outcomes to integrated housing & community based supports for persons exiting nursing homes. Although IHCD provided a Housing Choice Voucher preference for MFP participants, DOA has largely not assisted their constituents to access these rental subsidies.

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The DOA and MFP leadership shifted in January 2016 and with has come it an articulated commitment to facilitating increased opportunities for integrated and affordable housing and home & community based supports.

Recommendation # 2. Hold fast to IHCDA's leadership role in the implementation of Olmstead and the deinstitutionalization of persons with disabilities of all ages.

Indiana must use ConPlan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing (people with and without disabilities in the same development; economic integration) is needed.

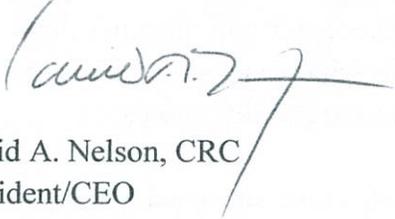
Issue #3: Homeownership is Out of Reach. Ground was lost in Indiana's homeownership opportunities for persons with disabilities and low incomes during the recent housing crisis. The IHCDA Section 8 Homeownership Program and the \$10,000 in down payment assistance for persons with disabilities were eliminated.

Recommendation # 3

- a. **Re-establish the Section 8 Homeownership Program** within the IHCDA Single Family Housing Department.
- b. **Re-establish up to \$10,000 in down payment assistance** for persons with disabilities and low incomes to assure participation in affordable home ownership opportunities.

Thank you for the opportunity to respond to this draft.

Sincerely,



David A. Nelson, CRC
President/CEO

9

Heidi Aggeler

From: Carolina Mora <cmora00@hotmail.com>
Sent: Wednesday, March 30, 2016 9:51 AM
To: jsipe@ihcda.in.gov; Angel Foster
Subject: 2016 Action Plan.

Importance: High

March 23, 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027
afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

My name is Carolina Mora, I am a person with disability and I'm working at accessABILITY Center for Independent Living as an IL Advocate and Hispanic & Latino Outreach Specialist assisting people with disabilities from 0 years of age to 55 and older.

First, I would like to acknowledge the great efforts IHCDA has made to improve housing opportunities for persons with disabilities, their families, friends and allies.

Thank you for the requirements for visitable design, the improvement and expansion of universal design features in affordable rental housing and the Ramp Up program.

As the Action Plan is finalized for 2016 it is important to continue to improve Indiana's affordable housing. Listed below are a number of problems and recommendations for solutions in the 2016 Action Plan.

We see that many people with SSI incomes cannot afford housing. I suggest that there should be more accessible units for people with incomes of 20 % or lower Area Median Income. There should also be more affordable options available for people moving out of nursing homes.

The Highest rate of fair housing discrimination complaints come from people with disabilities and we need to remedy this. As a solution, I suggest that we take steps to better enforce fair housing laws and educate all people on fair housing matters as a reasonable accommodations and modifications. We should also make sure that renters are being given information on how to file a complaint concerning fair housing discrimination. To get the best results, I would like to see the creation of a fair housing test. The records of this test as public record could assist in decreasing discrimination for all people.

Thanks so much for this opportunity to share my opinions and suggestions.

Sincerely,

Carolina Mora.

10

March 31, 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

The public comment period for the Consolidated Plan's annual Action Plan 2016 creates the opportunity to first celebrate the changing landscape of Indiana's affordable housing.

Noteworthy has been IHCD's leadership to create federally funded housing that may be used and accessed by most all Hoosiers through multiple avenues.

Visitability, a term that most of us stumbled over a few years ago, is now a design being used by a growing number of Habitat for Humanity Chapters across Indiana. The impact of IHCD's incentives and requirements for visitable design for all new single family homes, duplexes and triplexes is altering traditional building practices to incorporate an inclusive design that acknowledges typical human experiences (e.g., limited endurance, mobility limitations) and the changing needs of families over time. Finally, the adoption of a visitable design requirement in the HOME and LIHTC programs is a concrete example of the Fair Housing Act's requirement to "affirmatively furthering fair housing."

We look forward to the adoption of visitability standards by other non-profit housing organizations as a result of IHCD requirements. IHCD has adopted a best practice in home design from which the private housing market in communities across Indiana can learn and replicate.

Universal design features as defined in the Qualified Allocation Plan are now sharpened, aligned with building codes and incentivized. As IHCD has raised the bar on housing design that is beneficial to more persons Indiana's affordable housing industry leaders have responded.

Ramp Up, the recently announced accessibility modification pilot is a big step forward in responding to the draft plan of Indiana's *Analysis of Impediments to Fair Housing* (April 2015) where 75% of those surveyed responded that it was difficult/very difficult for persons with disabilities to find information about grant and loan programs to make

needed accessibility improvements/modifications to their homes. Multiple small non-profits are now pulling together their May 1, 2016 applications and looking forward to the building season.

Thank you for your responsiveness to our constituents concerns and recommendations regarding access. IHEDA is to be commended for truly using the public participation process to inform Indiana's affordable housing priorities and allocations.

Our challenge with the allocation of ConPlan resources (and other affordable housing funds used in combination with these resources) is to use these funds to address the needs of persons with very low incomes and disabilities. Following are a list barriers to be addressed and recommendations to increase the allocation of IHEDA and OCRA resources for those with extremely low incomes (e.g., 18% AMI)

#1 Barrier. Accessible Units Not Rented By People with Disabilities. In recent meetings with owners and property management representatives of tax credit and HUD funded housing developments, it has been noted that it is not uncommon to have persons who do not need the accessible units renting the units.

The lack of marketing the accessible units is assumed to be a contributing factor to persons using wheelchairs not renting these units. In addition, a major barrier is the lack of affordability of these units for tenants with incomes of 20 % - 30% AMI. Without rental subsidies people who use wheelchairs are continuing to be priced out of housing designed specifically to best accommodate their needs.

RECOMMENDATION #1: Rental subsidies must be tied to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI.

#2 Barrier: MFP and Housing. To date, the Indiana Department of Aging (DOA) and the associated Money Follows the Person (MFP) have had limited transition outcomes to integrated housing & community based supports for persons exiting nursing homes. Although IHEDA provided a Housing Choice Voucher preference for MFP participants, DOA has largely not assisted their constituents to access these rental subsidies.

The DOA and MFP leadership shifted in January 2016 and with has come it an articulated commitment to facilitating increased opportunities for integrated and affordable housing and home & community based supports.

RECOMMENDATION # 2. Hold fast to IHEDA's leadership role in the implementation of Olmstead and the deinstitutionalization of persons with disabilities of all ages. Indiana must use ConPlan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy

strategies that promote integrated housing (people with and without disabilities in the same development; economic integration) are needed.

#3 Barrier: Homeownership is Out of Reach. Ground was lost in Indiana's homeownership opportunities for persons with disabilities and low incomes during the recent housing crisis. The IHEDA Section 8 Homeownership Program and the \$10,000 in down payment assistance for persons with disabilities were eliminated.

RECOMMENDATION # 3

- a. **Re-establish the Section 8 Homeownership Program** within the IHEDA Single Family Housing Department.
- b. **Re-establish up to \$10,000 in down payment assistance** for persons with disabilities and very low incomes to assure participation in affordable home ownership opportunities.

In conclusion, it is important and a great pleasure to acknowledge the first outcomes of the newly established incentives for *integrated supportive housing* within the Low Income Housing Tax Credit program. It is exciting to see housing developers step forward with community partners to establish the *first two integrated supported housing models* in Valparaiso and Indianapolis.

Thank you for the ample time allowed for public input this year and for the outreach efforts and education provided for members of the disability community to prepare for informed public commentary.

Deborah McCarty
Executive Director
Back Home in Indiana Alliance
...a project of the Governor's Council
for People with Disabilities
125 West South St.
P.O. Box 2022
Indianapolis, IN 46206
317-638-2392 (O)
dlimccart1@aol.com

March 24, 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

My name is Angie Hass and I advocate for and with seniors with visual and mobility impairments through accessABILITY, Center for Independent Living. As a former employee of IHCD I know the importance of these funds to the viability of our communities and I'm grateful for this opportunity to partner with the agency to continue to serve some of our most vulnerable neighbors.

First, I would like to acknowledge and thank IHCD for your work to improve housing opportunities for persons with disabilities, their families, and the community. In particular, I am very excited about the new Ramp Up initiative and I look forward to hopefully working with IHCD on that program.

On behalf of seniors and people with disabilities, I wanted to comment on some barriers that I see them face as they live in our communities.

One crucial and potentially life threatening barrier is that people receiving SSI cannot afford housing, even with current subsidy programs. People receiving SSI fall into the category of 18% AMI while most rental properties have the majority of their units at 30%, 40%, 50%, or 60% AMI. Such housing units that are by nature designed to be affordable are in reality pricing out the people that need them most. A solution to this is to make more units affordable to people at 20% or lower AMI. Another solution is to increase the use of rental subsidies to help pay for accessible units.

Related to this barrier is the availability of units designed to be accessible. In recent conversations that our agency has had with property management representatives of tax credit and HUD funded housing developments, it has become clear that often people who do not need the accessible housing units are renting the units. One reason for this could be the lack of marketing the accessible units to people who could benefit from the accessible features. From the property management perspective, of course you don't want those units sitting vacant. From the perspective of people needing accessible units, if they aren't available, your options are living in a home that threatens your well-being and safety or face homelessness. There are several solutions to this,

one of which is to increase the number of accessible units available by maintaining incentives for tax credit properties to go above and beyond the number of Section 504 units beyond the 5% minimum. Another is to address the housing stock that is currently available by increasing the funds available for home modifications for rental properties and drawing the remodeling industry in to make current homes more accessible.

These barriers aren't mutually exclusive of each other and in fact produce a conundrum: when the accessible units do become available in current rental properties, they are often not affordable. We suggest, at the very least, establishing a requirement that accessible units are affordable at 20% AMI.

We trust that you will take these significant barriers into consideration with your decision making on the best use of these funds. On behalf of seniors and people with disabilities thank you for your leadership and service.

I look forward to continuing to work with you!

Sincerely,

Angie Hass

ahass@abilityindiana.org

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Heidi Aggeler

From: lisapoole11120 <lisapoole11120@frontier.com>
Sent: Monday, March 28, 2016 9:21 AM
To: jsipe@ihcda.in.gov; Angel Foster
Subject: 2016 Action Plan for Consolidated Plan

March 28, 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

My name is Lisa Poole. I am the Project consultant for Back Home in Indiana Alliance. I also volunteer at the League which serves 11 counties in Indiana.

First, I would like to acknowledge the great efforts IHEDA has made to improve housing opportunities for persons with disabilities, their families, friends and allies.

Thank you for the requirements for visitable design, the improvement and expansion of universal design features in affordable rental housing and the Ramp Up program.

Visitability is so necessary as most of the outlying counties the League serves is rural. There are so few homes that one can age in place at or even get into. The Ramp Up Program will help with the very long waiting lists for ramps to existing homes that need the modification.

As the Action Plan is finalized for 2016 it is important to continue to improve Indiana's affordable housing. Listed below are a number of problems and recommendations for solutions in the 2016 Action Plan.

#1. Accessible Units Not Rented By People with Disabilities. In recent meetings with owners and property management representatives of tax credit and HUD funded housing developments, it has been noted that it is not uncommon to have persons who do not need the accessible units renting the units.

The lack of marketing the accessible units is assumed to be a contributing factor to persons using wheelchairs not renting these units. In addition, a major barrier is the lack of affordability of these units for tenants with incomes of 20 % - 30% AMI. Without rental subsidies people

who use wheelchairs are continuing to be priced out of housing designed specifically to best accommodate their needs.

RECOMMENDATION #1: Rental subsidies must be tied to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI.

#2: MFP and Housing. To date, the Indiana Department of Aging (DOA) and the associated Money Follows the Person (MFP) have had limited transition outcomes to integrated housing & community based supports for persons exiting nursing homes. Although IHCD provided a Housing Choice Voucher preference for MFP participants, DOA has largely not assisted their constituents to access these rental subsidies.

The DOA and MFP leadership shifted in January 2016 and with has come it an articulated commitment to facilitating increased opportunities for integrated and affordable housing and home & community based supports.

RECOMMENDATION # 2. Hold fast to IHCD's leadership role in the implementation of Olmstead and the deinstitutionalization of persons with disabilities of all ages. Indiana must use ConPlan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing (people with and without disabilities in the same development; economic integration) is needed.

#3: Homeownership is Out of Reach. Ground was lost in Indiana's homeownership opportunities for persons with disabilities and low incomes during the recent housing crisis. The IHCD Section 8 Homeownership Program and the \$10,000 in down payment assistance for persons with disabilities were eliminated.

RECOMMENDATION # 3

- a. **Re-establish the Section 8 Homeownership Program** within the IHCD Single Family Housing Department.
- b. **Re-establish up to \$10,000 in down payment assistance** for persons with disabilities and low incomes to assure participation in affordable home ownership opportunities.

#4 Good quality market rental housing is not affordable for persons with SSI incomes in Indiana and throughout our nation.* Low income housing tax credit properties (LIHTC), the fastest growing affordable housing for more than a decade, has often been unaffordable for those with SSI incomes – people with disabilities are often “priced out” of this housing market.

RECOMMENDATION # 4:

Indiana must use Consolidated Plan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing (people with and without disabilities or “special needs” living in same development; economic integration) is needed to assure that those with very low incomes receive a fair share of all integrated and affordable housing units.

* Source: Priced Out. The Housing Crisis for People with Disabilities by Emily Cooper, Henry Korman, Ann O'Hara and Andrew Zovistoski. Technical Assistance Collaborative, Inc. and Consortium for Citizens with Disabilities. Boston, Mass. April 2009. For the full Priced Out report more see: www.tacinc.org Click on Publications

Finally; it is important to acknowledge the first outcomes of the newly established incentives for *integrated supportive housing* within the Low Income Housing Tax Credit program. It is exciting to see housing developers step forward with community partners to establish the first two integrated supported housing models in Valparaiso and Indianapolis.

We look forward to continuing to work with you.
Thank you for this opportunity,

Lisa Poole
Project Consultant, Back Home In Indiana Alliance
3904 Newport Ave #11
Fort Wayne, IN 46805
260.482.2868 lisapoole11120@frontier.com



March 31st, 2016

Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority (IHCDA)
30 S. Meridian St.
Suite 1000
Indianapolis, IN 46204

RE: 2016 Action Plan

Dear Mr. Sipe,

As the Executive Director for the Indiana Statewide Independent Living Council (INSILC), I thank you for the opportunity to offer IHCDA public comment on the 2016 Action Plan! The Council's purpose is to be the voice of Independent Living in the state and believes that individuals with disabilities should have the same civil rights, choices, options and control over their own lives just as individuals without disabilities.

I'd first like to commend IHCDA for establishing a visitability mandate and its new Ramp Up program. Both will be of tremendous benefit to people with disabilities in Indiana and aid in their ability to live integrated in the communities of their choice. INSILC looks forward to seeing both continue and the Ramp Up program grow.

As IHCDA moves forward with continuing to improve affordable housing and options across the state, I encourage the organization to consider addressing the following to further strengthen its efforts in supporting the disability community.

Based on complaints filed, the highest rate of fair housing discrimination occurs against people with disabilities. Knowledge of fair housing is often key in working to reduce this rate of discrimination. Therefore, I urge IHCDA to require any developers, landlords, property managers and their staff receiving any of its funding to attend fair housing training and education on fair housing laws, specifically on reasonable accommodations/modifications.

It's refreshing to see IHCDA's receptiveness to the public input it received for integration within its permanent supportive housing projects and respond accordingly to this feedback offering

integration incentives to developers for these LIHTC properties. Thank you for truly listening! I'd like to encourage IHCD to continue to be receptive and consider adjusting its approach to tackling housing barriers for vulnerable populations, which includes folks with disabilities. While the "Housing First" model provides a solid and stable place for individuals to call home and receive support services, permanent supportive housing projects still strongly mirror segments of congregate, institutional-type settings. I kindly request IHCD do more to promote true inclusion of all individuals in our communities and shift its direction of this model to scattered-site housing and create even greater incentives for developers to integrate supportive housing within existing and new communities.

And finally, IHCD has proven itself to be a leader aiding in the implementation of the Olmstead Act and deinstitutionalization of people with disabilities by continuing to provide Housing Choice Vouchers for participants utilizing the Money Follows the Person program. Again, I thank you! With new leadership in place at the Indiana Department of Aging (DOA), there is an articulated commitment to facilitating increased opportunities to housing and home and community based supports for people with disabilities and conditions of aging. As a result of this commitment, I ask IHCD to take advantage of this new leadership and collaborate with the DOA to apply for Section 811 funds when the next NOFA is released potentially providing additional affordable housing opportunities for individuals transitioning out of institutional settings to further deinstitutionalization of people with disabilities.

I applaud IHCD for all of its progress and program development creating more inclusive and diverse communities. The growth the organization has shown these last few years in support of those with disabilities is remarkable and I look forward to your continued efforts. Thank you for the chance to provide feedback into the 2016 Action Plan.

Best Regards,

Amber O'Haver

Executive Director
Indiana Statewide Independent Living Council (INSILC)
(317) 796.0537 - Phone
(317) 807.6100 - Fax
aohaver@insilc.org

Heidi Aggeler

From: Allison Bracken <allisonrolls@gmail.com>
Sent: Tuesday, March 29, 2016 11:18 AM
To: jsipe@ihcda.in.gov; Angel Foster
Subject: 2016 Action Plan Public Input

Dear Mr. Sipe and Ms. Foster,

Thank you for the opportunity to comment on the 2016 Action Plan. I am a person with a disability and work for an organization that serves and advocates for people with disabilities, so being able to participate in these efforts is very appreciated! I also wanted to share how thrilled I was in hearing about the new requirements for visitable design and the improvement/expansion of universal design features in affordable rental housing. As a wheelchair user, this has been a challenge when wanting to visit friends or the consumers I work with and not being able to access their home or be able to find affordable units that aren't accessible. I was equally excited to hear about the new Ramp Up program. As an advocate, I have often received calls from individuals who need ramps put on their homes in order to safely come and go and have had limited resources and funding to make this happen. I look forward to seeing how this program significantly improves the lives of many. With all that said, I really appreciate the efforts IHCDA has made to improve housing opportunities for persons with disabilities, their families, friends and allies.

My hope is that IHCDA resources (as well as other community resources) can make the very best use of these resources to address the needs of individuals with very low incomes and disabilities. Following are a list of recommendations to increase the allocation of IHCDA resources for those with extremely low incomes (e.g., 18% AMI)

1. Concern: Accessible units are not being rented by people with disabilities. It has been noted by owners and property management representatives that it is not uncommon for individuals who do not need an accessible unit renting these units. Lack of advertising these units with disability organizations or other housing and social entities could be a contributing factor that wheelchair/mobility aid users are not renting these units. Moreso, a major barrier is the lack of affordability of these units for individuals with SSI/low incomes at 20-30% AMI. Without rental subsidies, individuals needing accessible units are continuing to be priced out of housing designed specifically to best accommodate their needs.

Recommendation: Tie rental subsidies to accessible units to meet the needs of individuals needing accessible units or the LIHTC accessible units need to be affordable at 20% or below AMI.

2. Concern: MFP and Housing. To date, the Indiana Department of Aging (DOA) and the associated Money Follows the Person (MFP) have had limited transition outcomes to integrated housing & community based supports for persons exiting nursing homes. Although IHCDA provided a Housing Choice Voucher preference for MFP participants, DOA has largely not assisted their constituents to access these rental subsidies. The DOA and MFP leadership shifted in January 2016 and with has come it an articulated commitment to facilitating increased opportunities for integrated and affordable housing and home & community based supports.

Recommendation: Hold fast to IHCDA's leadership role in the implementation of Olmstead and the deinstitutionalization of persons with disabilities of all ages. Indiana must use ConPlan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing (people with and without disabilities in the same development; economic integration) is needed.

3. Homeownership is Out of Reach. Ground was lost in Indiana's homeownership opportunities for persons with disabilities and low incomes during the recent housing crisis. The IHCD Section 8 Homeownership Program and the \$10,000 in down payment assistance for persons with disabilities were eliminated.

Recommendations: Re-establish the Section 8 Homeownership Program within the IHCD Single Family Housing Department and **Re-establish up to \$10,000 in down payment assistance** for persons with disabilities and low incomes to assure participation in affordable home ownership opportunities.

Lastly, I wanted to share how exciting it is to see housing developers step forward with community partners to establish the first two integrated supported housing models in Valparaiso and Indianapolis! It is exciting to see the outcomes of the newly established incentives for integrated supportive housing within the Low Income Housing Tax Credit program.

Thank you again for the opportunity to comment on the 2016 Action Plan.

Sincerely,
Allison Bracken

March 31, 2016

2016 Consolidated Plan
OCRA
One North Capitol Street, Suite 600
Indianapolis, IN 46204

Dear Messrs. Sipe and Konya:

Thank you for the opportunity to provide a formal response to the 2016 State of Indiana Annual Action Plan Update. Please consider the comments below in the State's final plan submission:

Maximum grant amounts should be increased in all OCRA/CDBG programs. As you are aware, the U.S. Department of Housing and Urban Development (HUD) has implemented a variety of additional regulatory requirements over the last few years. These additional administrative requirements have put an increased burden on a shrinking staff. Indiana has long held a reputation for its "lean and efficient" CDBG program, but these additional administrative requirements will continue to take a toll on the staff ability to provide high level compliance monitoring for ongoing projects. According to Mr. Stan Gimont, Director of the Office of Block Grant Assistance at HUD, State and Entitlement grantees should be making fewer, larger grants in order to maintain compliance with decreasing state budgets and decreasing staff.

An increase in the maximum grant amount will not only reduce the oversight burden on the program staff, but will have significant impact at the grantee level, particularly for wastewater and drinking water projects. Currently, user rates are only slightly impacted with a CDBG grant of \$400K-\$600K on a project that is over \$1MM. Communities who meet eligibility requirements for CDBG assistance have residents with the least ability to take on additional monthly expenses. An increase from \$400K to \$800K could mean the difference in \$20-30 per month, which is a considerable amount for a low-to-moderate income family.

Eliminate the pro-rata draw requirement on CDBG infrastructure projects. Eliminating the requirement to draw funds on a pro-rata basis, will have a two-fold benefit: 1) grantees will not be required to start incurring interest on project loans as early, and 2) allowing for up front draws of grant funds will improve the State's expenditure of funds ranking with the U.S. Department of Housing and Urban Development. This possibility has been discussed and is strongly supported by the State Revolving Loan Fund and the U.S. Department of Agriculture Rural Development offices.

Decrease or eliminate the local match requirement on CDBG infrastructure projects. As mentioned above, communities that are eligible for CDBG grants are least capable of taking on additional debt and their residents are least able to absorb the capital expenses. Many of our smallest communities do not participate in the CDBG program because they cannot come up with a large enough match to fund a larger more competitive project. Allowing for a "hardship" grant or implementing a sliding scale for those communities with higher low-to-moderate income percentages will allow the most needy of Indiana's rural communities to take advantage of the grant programs available.

Increase maximum grant amounts on Planning Grants. Long term and short term planning is necessary to the ongoing sustainability of rural communities. OCRA has historically promoted and supported planning for rural communities in a variety of forms. CDBG Planning grant maximums should be increased to allow for communities to get a product that includes all necessary requirements at the highest quality. Currently, communities must provide much more than the 10% required match in order to meet their needs and OCRA's minimum technical requirements.

Minimum technical requirements should be put in place for Emergency Response Plans. These minimum technical requirements could be easily adapted from OCRA's Disaster Funded pilot Emergency Response Plans.

Temporarily eliminate the "under construction" requirement. OCRA has a long established policy on the number of grants a community may have open at one time, including a requirement on the status of open grants. Due to the delay in the 2016 calendar being announced and application rounds falling so close together, it would be appropriate for OCRA to waive the requirement that a grant be "under construction/contract" at the time of another grant application. Not only will this temporary waiver assist communities that would not have the ability to meet such deadlines, but it will assist the State with their own financial management compliance. Although it might reduce the actual number of municipalities receiving CDBG funds, as communities with multiple projects ready to go would benefit, this waiver would also improve the State's ability to meet its regulatory requirement for Timely Obligation of Funds and improve their ranking on HUD's monthly expenditure of funds matrix.

Eliminate or minimize the prioritization of seniors in Owner Occupied Rehab. For the last decade, IHCD has prioritized Owner Occupied Rehab (OOR) grants that specifically targeted seniors. While promoting "Aging in Place" is certainly a worthy goal, it has come at the expense of some rural communities and their citizens. IHCD should allow for a minimum or a set-aside of its OOR program for projects that target or include female head of household and/or single parent families. Many communities would argue that the long-term sustainability of their community requires that families of all age ranges be able to live and work in the community. Assisting these additional groups will help ensure a community is able to maintain a higher assessed value in their community and the low-to-moderate income families that are assisted will have better assets for long term financial stability.

15-cont

Reinstate the Rental Rehab Program with CDBG funding. IHDA should consider reinstating the Rental Rehab Program with CDBG or other funding sources. Assisting property owners rehabilitate a residential unit will not only increase the property's assessed value in the community, but will ensure decent safe and sanitary living conditions for low-to-moderate income families that are not ready to make a permanent investment in a home.

Thank you for your consideration,

Kathleen Weissenberger

Kathleen Weissenberger
Founder and Principal



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Southern Indiana Center for Independent Living, Inc.

1490 West Main Street, Mitchell, IN 47446

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March 30, 2016

Indiana Office of Community and Rural Affairs
One North Capitol Avenue, Suite 600
Indianapolis, IN 46204-22288
Attn: Consolidated Plan

To Whom It May Concern,

I was excited to learn about the Ramp Up Indiana program at a work training recently! I am the Monroe County Coordinator for the Southern Indiana Center for Independent Living, and work mainly in Bloomington. Even though Bloomington abounds in social service organizations, no one provides funding for ramps to be built. Area 10 Agency on Aging in Ellettsville doesn't even have a program. For a person with a disability, being able to enter and leave their own home unassisted, makes a tremendous difference to that persons' life.

In fact, I just received a call yesterday from a woman needing a ramp to be built, as she has trouble walking. That makes her the fourth person I've received a call from requesting a ramp. And that's just in this county! I'd hate to think about all the other people with disabilities I don't even know about, not to mention what the situation is for the other 91 counties.

Monroe County has the second highest cost of living in this state. People receiving SSI or SSDI simply cannot afford to have a ramp built.

"Our vision is that technologies and environments are designed for people of all abilities"

On another topic, there is a serious need for more affordable rental housing options in this county, with rent being based on income. There is plenty of affordable housing for seniors, but not others.

There is also a definite need for transitional housing, with a month-by-month rent. There is a homeless population problem in Bloomington that is being addressed, with much success, but a need still exists for this type of housing. I regularly get calls from a homeless person with a disability needing housing.

A person with a disability needs to be able to stay in their own apartment, while awaiting an approved one to become available. A year's lease is too large a burden for someone on SSI. Someone's housing circumstances can change overnight, and people need more options.

Bloomington Housing Authority has an extensive wait list. There's a years' wait list for the senior apartments, in Ellettsville, that Area 10 manages.

I respectfully ask that the State make a commitment to include a fair share of housing funding, for persons with disabilities, in its five-year Consolidated Plan for housing.

Sincerely,

Ms. Catherine Anders

Monroe County Outreach Coordinator

Southern Indiana Center for Independent Living

Blmgt Work 1

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March 30, 2016

Indiana Office of Community and Rural Affairs
One North Capitol Avenue, Suite 600
Indianapolis, IN 46204-22288
Attn: Consolidated Plan

To Whom It May Concern:

My name is Christen Finn, and I am the Lawrence County Outreach Coordinator for Southern Indiana Center for Independent Living (SICIL).

First, I would love to thank you for your efforts to increase affordable, accessible housing to individuals in need.

Unfortunately in my community, I continue to see a lack of availability to the low income and disabled population. I have several consumers who have aged out of their homes or who have unexpectedly become disabled and have lost access to their own independent environment.

Programs like "Ramp Up" could potentially change the quality of life for those who cannot continue living in a manner in which they are accustomed to. I would again like to commend you and encourage you to continue to move forward in your efforts to increase the independence of your constituents. It means more than you will likely ever know!

Sincerely,

Christen Finn

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Southern Indiana Center for Independent Living, Inc.

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March 30, 2016

Indiana Office of Community and Rural Affairs
One North Capitol Avenue, Suite 600
Indianapolis, IN 46204-22288
Attn: Consolidated Plan

To Whom It May Concern:

My name is Chris Spinks. I work with an independent living center in southern Indiana. I want to thank you for the introduction of the Ramp Up Program. This program alone has the potential to change people's lives. We had a woman we assisted we assisted in finding funding last year that had not been able to leave her home on her own for more than a year. She has her ramp now and is very active in the community. This is the outcome we hope for with our other consumers in need. Many see a ramp as a small minor thing. It actually is FREEDOM to those in need of one.

While there is some improvement in many areas of the consolidated plan that benefit individuals with disabilities, there is a much greater need. Many individuals with a disability are lower income and limited on the type of apartment/home and location.

Please continue to advocate for increased ways to use funding to allow people on SSI the opportunity to afford housing and people with homes to be able to utilize those dollars for smaller home repairs. There should be a way to set this funding aside in a similar fashion as the Ramp Up program to allow individuals to have minor modifications and roof repairs done. It just makes more sense to help a greater number of people with small things instead of 10 people with a major project.

I would ask that you move to reinstate the Home Fund that would assist individuals with down payments for First Time Home Buyers and expand on the use of Section 8 vouchers. We have encountered consumers with Section 8 vouchers that are struggling to find an apartment/house that will take the voucher, is affordable and accessible. These individuals wait for a long time to get the voucher and it has to be utilized in a certain period of time without affordable, accessible and integrated options available.

I strongly advocate for furthering fair housing, Universal Design and Visitability in our state. You have listened and made great strides in this area. I can't help thinking what If there was a way to get architects and builders to build all new construction with Universal Design standards

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eventually there would no longer be a need for home modifications for accessibility as people age. All homes would be accessible and visitable from the beginning for everyone. I know this may be a naïve thought or dream, but it would simplify life for many people.

Again, I want to acknowledge and thank you for all of your efforts to bring about positive changes and allowing us the opportunity to comment on the Consolidated Plan. Please continue this work and understand that you have a direct affect on the lives of the citizens in the State of Indiana that are most in need.

Thank you!

Sincerely,

Chris Spinks

“Our vision is that technologies and environments are designed for people of all abilities”

Hello, my name is Jewel Lofton. Two personal friends of mine have benefitted greatly from the Barton Tower, the Barton Annex, and the Oxmoor Meridian Apartment. But that's not all, I have witnessed these places benefit many lives in the great city of Indianapolis and I would like to encourage the increased and continued investment of affordable housing programs throughout the State of Indiana.

I would like to share a story about a friend who benefited from the Shelter Plus Care program to explain why I believe the program is important and more funding should be dedicated towards its efforts. I will not share my friend's real name, but let's call her Rachel. Rachel is a 45 year old woman, who worked for Indiana University while renting an apartment. Being freed from drugs and alcohol for five years, Rachel rejoiced that her life was back on track.

After being diagnosed with Multiple Personality Disorder (MPD) Rachel struggled in returning to her regular life; due to her instability Rachel lost her job. Taking new medications and trying to cope with MPD, she spiraled downwards into depression. This, once independent, woman lived in fear because without an income she could end up homeless.

Going days without eating so she could pay her rent, the broken Rachel found herself at the bottom of the barrow. With nowhere to turn she went to a shelter for help. While living there for about two years Rachel received the correct medications and joined mental health support groups. Later she was housed in the Shelter Care Plus program. This was one of the happiest days of her life.

Now this strong woman is an active member of the community. She is a lead volunteer and an assistant director for the shelter she once lived in and has become a mentor to broken women. Rachel is grateful to this program because her life is once again blossoming. There are so many flowers wanting to blossom and to give back to their community just like she does. I would like to suggest that the Shelter Care Plus program be issued state wide so cities that are non-entitlement communities can have the same or a similar impact on people lives and their communities. Please consider allocating more funding to this program.

Thank you,
Jewel Lofton



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Indiana Consolidated Plan 2016 Annual Action Plan

Public Hearing, March 22, 2016
PUBLIC COMMENTS

We want to hear from you!

Please leave us your comments about the 2016 Action Plan. We want to know your thoughts about everything, ranging from the organization of the draft report to the funding allocation plans.

If you would like to receive a final copy of the 2016 Action Plan emailed to you, please make sure you have put your name and email address on the sign-in sheet. Thank you!

Name: Annie Poole

Currently there is no funding available for migrant farmworker housing. I would like to see funding restored thru IHCDA using CDBG for growers to utilize by permission from their county comm. for the development of farmworker housing. 85% of fruits + vgs are still hand picked + for Indiana to continue to keep pace supplying fresh food workers must have affordable decent + safe housing. There are no other funding sources available for migrant farmworker housing. Thank you



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Indiana Housing and Community Development Authority

Indiana office of Community and Rural Affairs

One N. Capitol, Suite 600

Indianapolis, IN 46204

Dear Mr. Sipe and Ms Foster:

My name is Kevin Burk and I am a disability advocate from Washington County Indiana. I am also an individual with a debilitating disease who is struggling with the very thing I'm writing to you about. More housing opportunities for the disabled.

First off I would like to say thank you for the improvements and programs that have been initiated to help us with this difficult situation, such as the ramp it up program which I am a volunteer for an organization that builds ramps and the demand is quite high in my county so thank you for recognizing a need and helping deal with it. I am also very excited on the push of the visitability laws and policies when it comes to building new homes, and how it will allow people like myself to feel more welcomed and comfortable in someone else's home.

I would like to offer some suggestions for the upcoming consolidated plan of 2016. First being an individual with a disability I know firsthand how hard it is to be able to be a homeowner with the need of a big down payment, it's hard enough to be able to survive on the kinds of budgets the disabled community live on, much less try and save up money for a down payment on a home. I believe if there were some programs that we could put in place to help disabled individuals have assistance in placing a down payment on a home than it

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would open up opportunities for a person with a disability to be a home owner. I am in this situation right now myself I can afford a home, I'm responsible enough, and I'm capable of keep up with it but with rental fees where I live now and utilities it is hard to save up enough for a down payment. Once in the home though it cuts living expenses in half. I can own a home with a mortgage of \$350 a month, but instead I'm renting the same home for \$600. Here in lies the problem, the homes we need we can't purchase, the homes that are not accessible affordable or safe are the ones were living in, we have to live where we can which takes away the ability to choose what kind of home and location of the home we get, and when the ones we shouldn't have are all taken were homeless. It helps the community when more housing opportunities are given to any group and that's all we are looking for. Opportunities.

I recently worked with a consumer of mine that had been living in a dangerous situation, his roof was falling in and rotting and the worst spot was around a skylight that was right above his island in his kitchen. This was where he prepared his food and sat and ate. At any minute he could have been injured had that roof gave way? He dealt with this for seven years and is still dealing with it today. There needs to be something where the use of CDBG funds can be used to offer more home repairs for home owners as well as renters. I recently had to bathe in a sink for 3 months because I'm a renter my handicap chair in my tub punctured through the bottom of my bathtub and could not be fixed. So because I was a renter and it was my fault I had to fix it, I couldn't afford to fix it and because I rented no organization would touch it. So like so many others like me I just survived until someone who cared helped me and paid for it to be fixed. This is just two stories of the many I have to tell. It's important that we make a way for disabled people to be able to have their own homes, know there's a way repair the ones they rent, and feel like it's getting better for our chances to survive. Thanks for taking time to read this letter and keep up the hard work, it's appreciated more than you know.

Thanks, Kevin Burk

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March 31, 2016

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2016 Annual Action Plan
Indiana Housing & Community Developing Authority
One North Capital – Suite 600
Indianapolis, In 46204-2027

Dear Indiana Housing & Community Developing Authority,

My name is Deb Newlin. I am employed with Southern Indiana Center for Independent Living (SICIL). I am the Crawford County Outreach Coordinator.

I would 1st like to thank Deputy Executive Director & Chief Estate Development Officer Matt Rayburn for all his hard work. Not only did he attend and help with last year's conference, 'Back Home in Indiana' annual meeting and meal, but he also helped me during the Fair Housing Conference. I have to say that I was surprised to see him at the Public Hearing that was held at Scottsburg. He is a very nice and helpful young man.

I know that Indiana's Housing & Community Development Authority & OCRA has 4 basis goals. The 1st is to expand and preserve affordable housing. There are apartments available in my county to rent, but for some reason the owners do not give the homeless, disabled, and those filling for disability section 8 vouchers so they can live there. My consumers could use your HOME Investment Partnerships. The rental assistance, down payment, and rental subsidies would come in handy for them.

The 2nd is to reduce homelessness & increase housing stability for special needs populations. Once again, Crawford is a rural county and there are no 'new' construction sites for community development. Once more consumers could use your HOME Investment Partnerships. The rental assistance, down payment, and rental subsidies would come in handy for them.

To provide livable communities & community revitalization is the 3rd goal. While there is a 'Habitat for Humanity' organization in Crawford County and they are building another livable & visitable home starting April 2, there is no other construction going on in the county that is meeting this need. My consumers could use your HOME Investment Partnerships. The rental assistance, down payment, and rental subsidies would come in handy for them.

The last goal deals with providing activities that promote economic development. Once again Crawford's rural setting puts a damper on reaching this goal. There are only 2 manufacturing plants in Crawford County. There is 1 grocery store. Crawford has about 4 good restaurants. There are a few convenient stores. There is also a truck stop by the interstate. You can add a few mechanics to that list. Crawford County does not even have a stop light. Even when activities are planned for the senior & disabled population they have little to no money for gas to come to the events.

Crawford County does not have any emergency shelters. If a tornado was to pass through our county there is nowhere for our disabled and/or senior citizen to go. When one of my consumers

lose their housing, there is nowhere for them to go if a family member or friend does not take them into their home. This means that the disabled and/or senior citizen is left out in the cold to live in their car or under a bridge so-to-speak. I recommend that if a county does not have a homeless shelter that HUD help to obtain a home for this need or have one built. The Emergency Solutions Grant would help Crawford with housing and shelter grants. The Community Development Block Grant would also help Crawford County with disaster funds.

I know that the Community Development Block Grant also helps with ramps and we need ramps. The Crawford County Community Foundation is supposed to help my consumers and give me money for ramps for my consumers, but the lady that controls the foundation has never given me any ramp money. She told me that she can spend the money as she wants and she mainly just gives scholarships to graduating high school seniors. Last year she also gave \$2 million to the county veterans for a memorial; while I have no problem with that, my consumers still need ramps.

Crawford County needs all of these things and more. It needs decent, low cost, visitable, housing that includes assisting homeless people. My county is a poor rural district. Can you help us?

I want to thank-you for your time.

Sincerely,

Deb Newlin
Southern Indiana Center for Independent Living (SICIL)
Crawford County Outreach Coordinator
1490 West Main Street
Mitchell, Indiana 47446
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Office: 812-277-9626
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March 31, 2016

Aletha Dunston
State CDBG Director
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

Dear Ms. Dunston:

The Indiana Association for Community Economic Development (IACED) supports a network of approximately 200 organizations that build vital communities and resilient families. Our members are comprised of non-profit human service providers, housing developers, community development corporations, local units of government, financial institutions and private businesses united by a mission to transform Hoosier communities, especially those that are economically distressed, through comprehensive community development solutions in rural, urban and suburban neighborhoods.

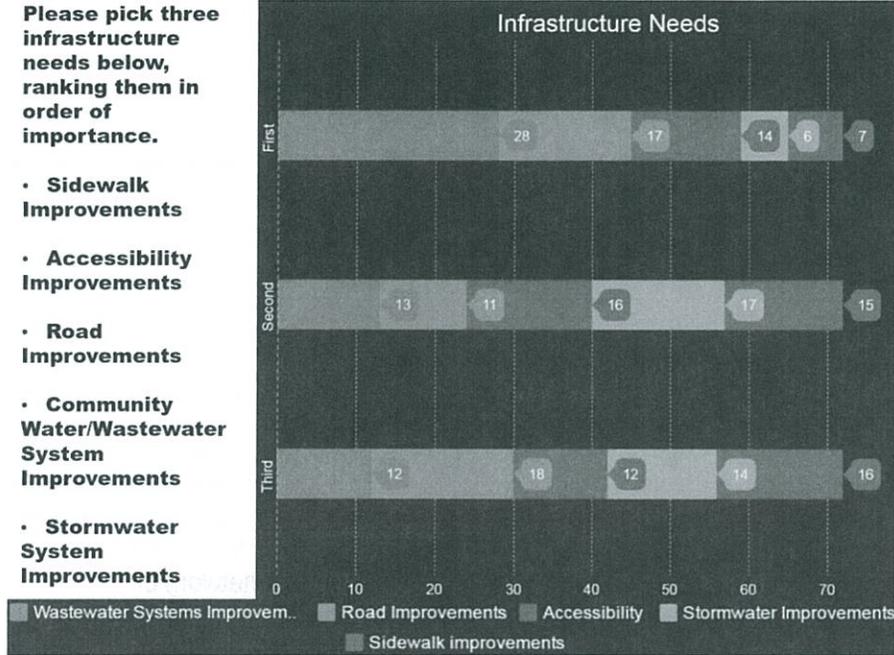
Expanding access to safe, affordable housing is a cornerstone of that mission. IACED members work not only to meet basic human needs, such as providing food and shelter, but to ensure low-income Hoosiers have the kinds of tools and resources required to attain and maintain economic sufficiency.

IACED actively engages our membership on policy issues through surveys, direct stakeholder interviews and communities of practice and affinity convening conversations. Through such surveys and conversations, we are able to identify areas where community development approaches are effective and those that should be improved upon to be responsive to local needs. On behalf of our membership, we offer the following insights and recommendations with the hopes of furthering the community development goals shared by the Indiana Housing and Community Development Authority (IHCDA), the Indiana Office of Community and Rural Affairs (OCRA), practitioners and advocates relating to Indiana's Annual Action Plan.

The Plan cautions that certain viewpoints can be overrepresented in surveys and public meetings, depending on the composition of participants. Accordingly, we have worked to balance the survey results received from 65 members and partners with perspectives expressed in recent convenings and stakeholder interviews.

1. FINDINGS: INFRASTRUCTURE

It is clear from our results that the Plan's proposal to devote the most significant amounts of CDBG infrastructure investment in improving wastewater systems is in line with what our participants felt was most critical at the community level. Some results, however, also heavily emphasize their investments, specifically in roads, sidewalks, and accessibility, in order to improve the quality of life in Hoosier communities.



Since the Plan does not specifically address those issues in describing investment plans, we encourage those priorities to be weighted appropriately in reviewing project applications in order to effectively achieve Goal 3 of the Consolidated Plan to, “promote livable communities and community revitalization through addressing unmet community development needs.”

Additionally, IACED members and partners have indicated that the CDBG maximum grant award should be raised to keep up with project costs and increase impact. Project costs have continued to climb, but the maximum amount has not kept pace with those increases. As a result, communities are not submitting innovative, impactful projects because the grant dollars do not effectively offset the administrative burden of complying with federal CDBG requirements. Other enhancements that would improve projects would be a change in the requirements of spending down CDBG and match dollars. Instead of spending 50 percent of the match and 50 percent of the grant dollars for each expenditure, practitioners recommend using the grant dollars first, if the match is in the form of a loan, in order to prevent the interest accumulation early in the project and save money overall. That would not affect any match requirements, only a change to current process.

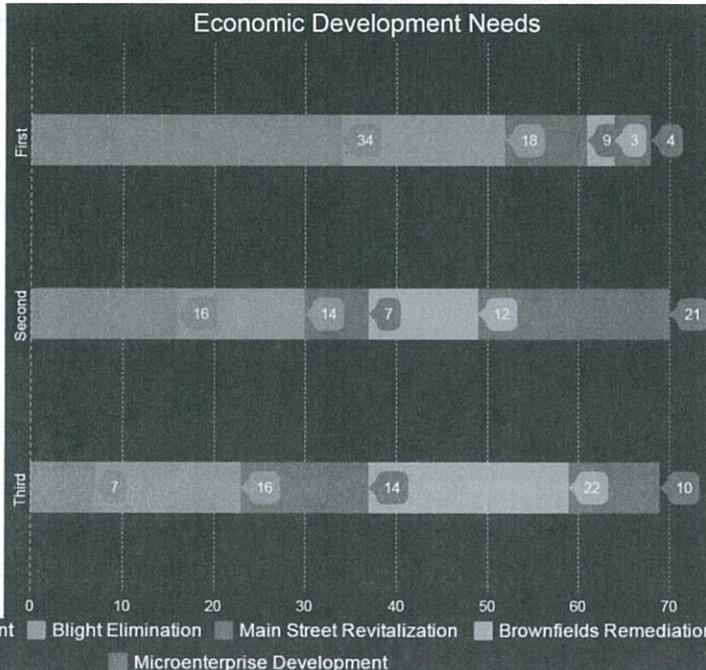
2. FINDINGS: ECONOMIC DEVELOPMENT

By far, workforce development investments were clearly the biggest priority for our survey participants. That numerical indication is backed by the anecdotal information we have received from members, especially in recent years, about the need for citizens in their communities to receive training and education to attain living wage jobs, especially as manufacturing losses present economic challenges throughout the state. New employment training and opportunities will reduce the current continued strain on our emergency human services infrastructure, as individuals and families struggle to afford basic needs while working one or multiple minimum wage positions.

As such, we are encouraged by the additional \$250,000 proposed for workforce development programs in the allocation priorities section of the Plan. However, we think the need demonstrated at the community level justifies increasing that priority even more substantially as final allocations are determined.

Please pick three economic development needs below, ranking them in order of importance.

- Workforce development/ Skills training
- Brownfields Remediation
- Blight Elimination
- Main Street Revitalization
- Microenterprise Development Opportunities



Further, we would like to see a broader range of economic development activities that spark innovation and support entrepreneurship at the local level, especially for those who lack access to traditional credit or business development support. We believe increased investments in microenterprise lending are crucial to spurring investment in local economies. Microenterprise investments, which provide assistance to

organizations that help low-income entrepreneurs who lack sufficient training and education to gain access to the capital they need to establish and expand their small businesses, should be a key goal in economic development priorities of the Plan.

3. FINDINGS: COMMUNITY DEVELOPMENT AND REVITALIZATION

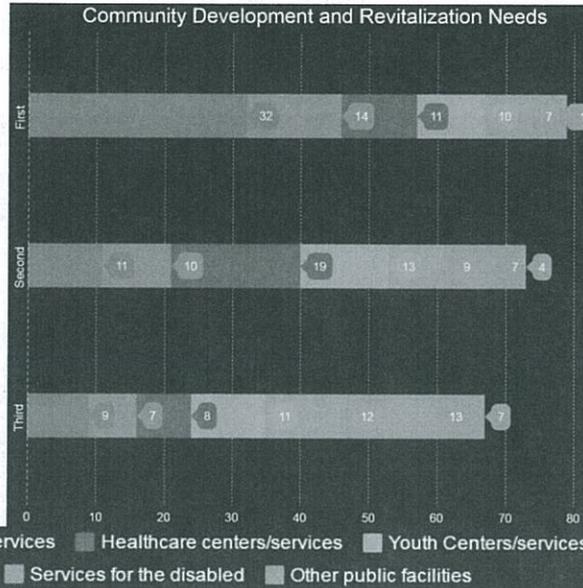
We applaud the Plan's recognition that helping vulnerable Hoosiers and communities requires investments beyond those in housing. Specifically, Goals 3 and 4 of the Consolidated Plan focus on promoting livable communities and enhancing economic development efforts. As the survey results on the following page clearly indicate, local communities feel investments in public transit are critical to achieving those aims.

While the Plan does acknowledge the importance of access to public transportation for low- and moderate-income populations as it pertains to housing, we believe this should be a bigger priority overall. Simply awarding increased points to HOME proposals that are convenient to existing public transportation options does not address the lack of public transportation options available to help people access services and employment. We believe the Plan could go beyond simply awarding more points based on existing public transportation infrastructure and support local efforts to expand public transit options.

The other clear takeaway from the second, third, and fourth priorities is that our communities are in need of

Please pick three community development needs below, ranking them in order of importance.

- Centers/services for the disabled
- Other public facilities
- Public transit
- Senior centers/services
- Community healthcare centers/services
- Community planning
- Youth centers/services



additional centers and wrap-around services for vulnerable populations. More can be done to provide proper outreach and support to achieve the kind of impact our members and partners strive to accomplish in the communities they serve. We would encourage a more specific proposal in the Plan to reference these priorities beyond traditional ESG supports targeted for homeless

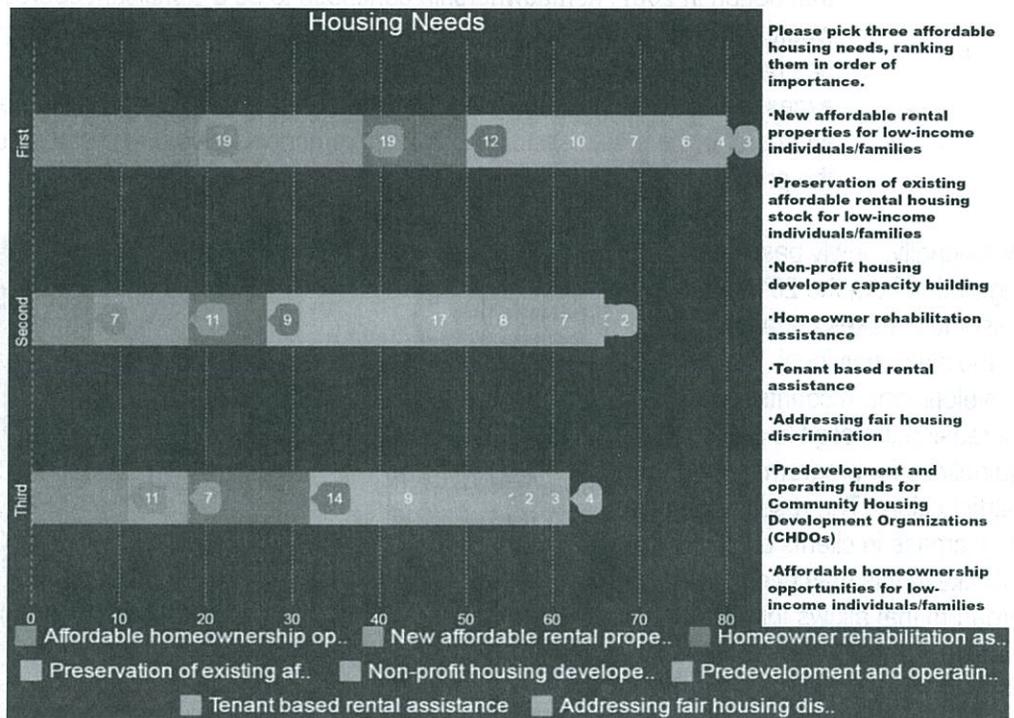
populations. These kinds of community development activities are needed to leverage the housing investments of Hoosier communities, families and individuals. They also serve to prevent incidence of homelessness, directly in line with Goal 2 of the Consolidated Plan to “reduce homelessness and increase housing stability” and Goal 3’s objective to address “unmet community development needs.”

4. FINDINGS: HOUSING NEEDS

Prioritizing low- to moderate-income households for targeted housing supports also serves to reinforce efforts to prevent homelessness among a housing instable population. With that in mind, we applaud the Plan’s specific goal to “attempt to reach low and very low-income levels of area median income,” when prioritizing housing resources. We believe that QAP-funded projects should also reflect that priority, especially Rental Housing Tax Credits/HOME combination-funded projects to align with the very low-income targets within HOME program priorities.

As indicated in the graphs on the following two pages, respondents expressed there is a virtual tie for the top housing need in Indiana communities- between the need for affordable homeownership and additional affordable rental housing for low-income individuals and families. There is also a near tie in responses on how investments relating to those needs should be balanced. The tension between the strong need for both kinds of affordable housing is echoed throughout our diverse membership in conversation after conversation. We recognize limited funding exists to provide adequate resources for both goals, but we would like to share some recommendations based on this expressed need and what is proposed in the Plan.

Page 48 of the Plan indicates, “The primary activities to foster and maintain affordable housing are the State’s CDBG and HOME funded activities that include the production of new units, homeownership opportunities, home rehabilitation and capacity support for affordable housing developers.”



Yet as one can read on page 35 of the Plan, allocation priorities for

HOME funds outline various affordable rental supports- through HOME rental projects, Housing First, Rental Housing Tax Credit combinations under the Qualified Allocation Plan, and Tenant Based Rental Assistance- and only one main source for homeownership projects. What is more, the scoring for HOME projects weights rental project applications at 33 and homebuyer projects only at 24. We strongly feel there is a need for better balance in how limited low-income housing resources are allocated.

As we emphasized in our comments on the 5-year Consolidated Plan, Indiana continues to enjoy higher homeownership rates than the national average – a little more than four (4) percent above the national average as of the fourth quarter of 2015, according to the latest data from the U.S. Census.¹ Still, the dream of homeownership has eluded many low- to moderate-income Hoosiers in the fallout from the Great Recession. Wisely, loan originators have strengthened lending standards and more appropriately take into account a consumer’s ability to repay a loan; but our members across the state indicate that those restrictions have become so stringent, it is nearly impossible for many individuals and families to qualify.

IACED members are well aware that significant housing rental needs exist and applaud worthy investments in expanding that stock, but they also know that homeownership remains one of the single most effective mechanisms to help low- and moderate-income families build assets and multi-generational wealth. There is increasing data to show the positive economic impact of homeownership for these income levels.

Consider the following excerpt from a 2013 study from Harvard’s Joint Center on Housing Studies:

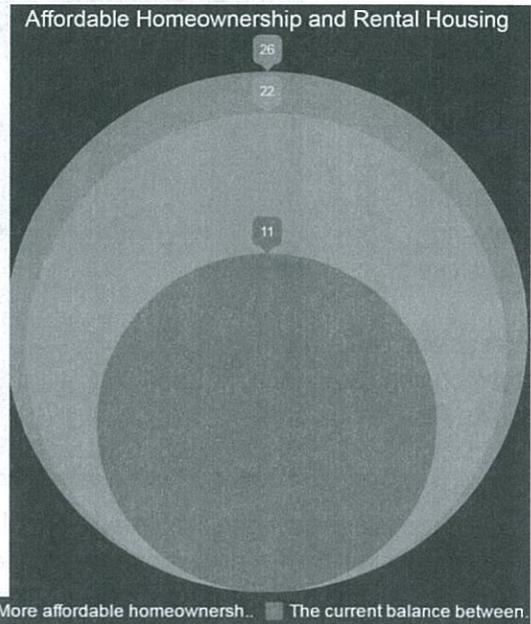
¹ Housing Vacancies and Homeownership (CPS/HVS), U.S. Census, <https://www.census.gov/housing/hvs/data/rates.html>

Even after the tremendous decline in housing prices and the rising wave of foreclosures that began in 2007, homeownership continues to be a significant source of household wealth, and remains particularly important for lower-income and minority households. As has become painfully clear, owning a home is not without risk. But even during a time of excessive risk taking in the mortgage market and extreme volatility in house prices, large shares of owners successfully sustained homeownership and created substantial wealth in the process.²

Additionally, newly passed legislation from the 2016 General Assembly makes enhancements to the state Individual Development Accounts, including increasing the eligible poverty guidelines for program participation. The result will be an increase in clients eligible to partake in this matched savings program that allows for low-income individuals to receive financial counseling and save for various asset purchases, including purchasing a home. Indiana should take advantage of this opportunity to support stronger affordable

Please select one of the answers below to indicate how appropriately Indiana is prioritizing these needs.

- **More attention should be paid to affordable rental support and services**
- **More attention should be paid to affordable homeownership support and services**
- **The state's efforts and plans reflect the appropriate balance between these two goals**



homeownership opportunities for these individuals throughout the state. IACED would also like to see an increased emphasis on pre- and post-purchase housing counseling and the capacity of nonprofit organizations on the ground to offer these services.

With regard to the clear, ongoing need for affordable rental units as well as homeownership options, we would also recommend reinstating the rental rehabilitation program that Indiana previously operated using CDBG dollars. We believe the survey results expressing the need for additional units and preservation of affordable rental stock would be effectively addressed by a program designed to help preserve and rehabilitate units that already exist in communities throughout the state.

² Christopher E. Herbert, Daniel T. McCue, and Rocío Sanchez-Moyano, Harvard University, Joint Center for Housing Studies, September 2013, <http://www.jchs.harvard.edu/sites/jchs.harvard.edu/files/hbti-06.pdf>

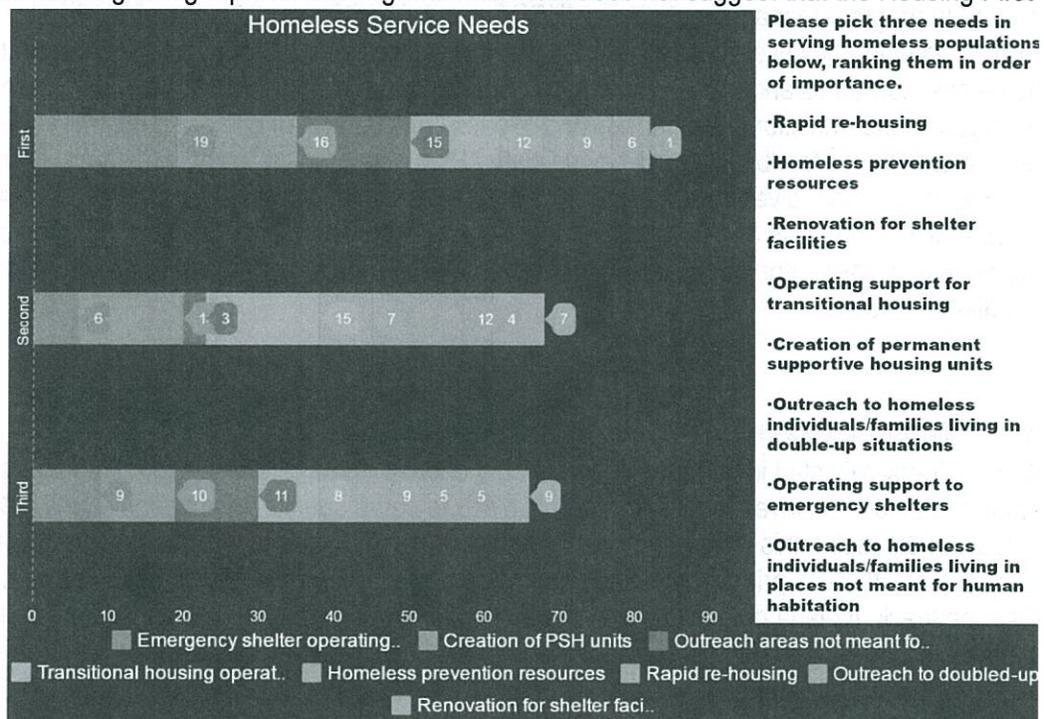
5. FINDINGS: HOMELESS SERVICE NEEDS

In this section of our survey, feedback again reiterates the diversity of IACED membership views on the most pressing priorities in serving homeless Hoosiers. The clear top priority is providing additional operating support for emergency shelter operations. That is followed by the need for the creation of additional permanent supportive housing units, street outreach and transitional housing support. IACED would like to applaud the inclusive and collaborative planning efforts on behalf of the Balance of State Continuum of Care in its diligence in consulting diverse populations and service providers in creating the state plan. However, we do have some ongoing concerns in the prioritization of admittedly scarce resources when one considers the scope of the challenge in combatting homelessness we hope IHCD will take these concerns into consideration.

Our membership has concerns regarding the limited resources allocated to serve those who are homeless, but not chronically homeless single adults. While the Plan states a priority to reduce family homelessness, emerging research data regarding rapid re-housing and recidivism does not suggest that the Housing First model is

effective for individuals who do not need the permanent supportive housing model in order to achieve stability³. In fact, for cities that have been implementing this model since the late 1980s, the recidivism rates and costs associated with emergency

shelter recurrence has increased. That is not to say, by any means, that permanent supportive housing and Housing First are not effective; but it does not make sense to have a one-size-fits-all model in Indiana when we have data to prove it is not effective for all situations. One clear example is the priority to reduce shelter stay, but not taking into account that homeless individuals fleeing domestic violence rely on extended emergency and transitional shelter stays to ensure stability and economic security. In the situation of family homelessness, housing, in and of itself, is not the primary solution to preventing homelessness. Instead, incidence domestic violence and/or lack of access to affordable childcare, transportation, and living wage employment opportunities are often the primary destabilizing source. We



³ Institute for Children, Poverty and Homelessness, "Beyond Chronic Homelessness, A Review of Statewide Plans" (ICPH) http://www.icphusa.org/PDF/reports/ICPH_PolicyReport_BeyondChronicHomelessness_AReviewofStatewidePlans.pdf

frequently hear from homeless practitioners in our membership that rapid re-housing and permanent supportive housing have not been effective in helping clients in those situations throughout the state.

In fact, going even beyond family homelessness where the parent is with the child, data from the 2015 State of Homelessness in America report from the National Alliance to End Homelessness showed that 6.7 percent of Indiana's homeless population is comprised of unaccompanied children and youth⁴. That is not a population well-served by currently prioritized homeless set-asides from the federal level down to the local level, which tend to focus on chronically homeless individuals, especially those who are difficult to house based on health impediments, disabilities or addictions. In that same report, it was revealed that 578,424 individuals experienced homelessness in the prior year, but 83 percent of those are not classified as chronically homeless, and therefore, are not the priority for funding.

For Indiana, that report found that there was an overall 2.1% decrease in Indiana homelessness from 2013-2014, which is something that is worth celebrating and reflective of the dedication from providers on the ground to program management staff at IHCD to serving these most vulnerable citizens. There is more work to be done, however; because during that same time period, there was a 7.6 percent increase in homeless individuals and individuals in families living in doubled up situations and a decrease in emergency and transitional shelter housing capacity of 4.8 percent and 5.2 percent, respectively. As we emphasized in our feedback on the Consolidated Plan, the issue of addressing family homelessness is one that requires a more diverse, comprehensive approach-especially considering that in 2006, one (1) in 50 children were homeless and that number has steadily climbed, reaching one (1) in 30 as of 2013.⁵ IACED urges an increased prioritization in balancing homeless funds to address the diversity of our homeless population's needs.

6. FINDINGS: SERVING SPECIAL NEEDS POPULATIONS

As it is clearly reflected in the survey results on the following page, our respondents agree with the emphasis placed on investments for aging in place to serve special needs populations. We applaud the focus on addressing this increasing need throughout communities in Indiana. We do want to provide some feedback on HOPWA prioritization and community engagement. As we stated in last year's Consolidated Plan feedback, Indiana gained national news attention for the emerging HIV epidemic that started in rural southern Indiana a year-and-a-half ago. Since then, Governor Pence declared a state of emergency and authorized a short-term needle exchange program⁶ to stem the tide of infection rates. But it was only an emergency extension; and, given the high-risk population involved, this was only a temporary solution to a long-term problem. While this appears on its face to be a healthcare crisis only, that is simply not the case; and there are community development solutions that can empower our state in preventing the spread of new HIV infection and providing critical housing supports to affected patients.

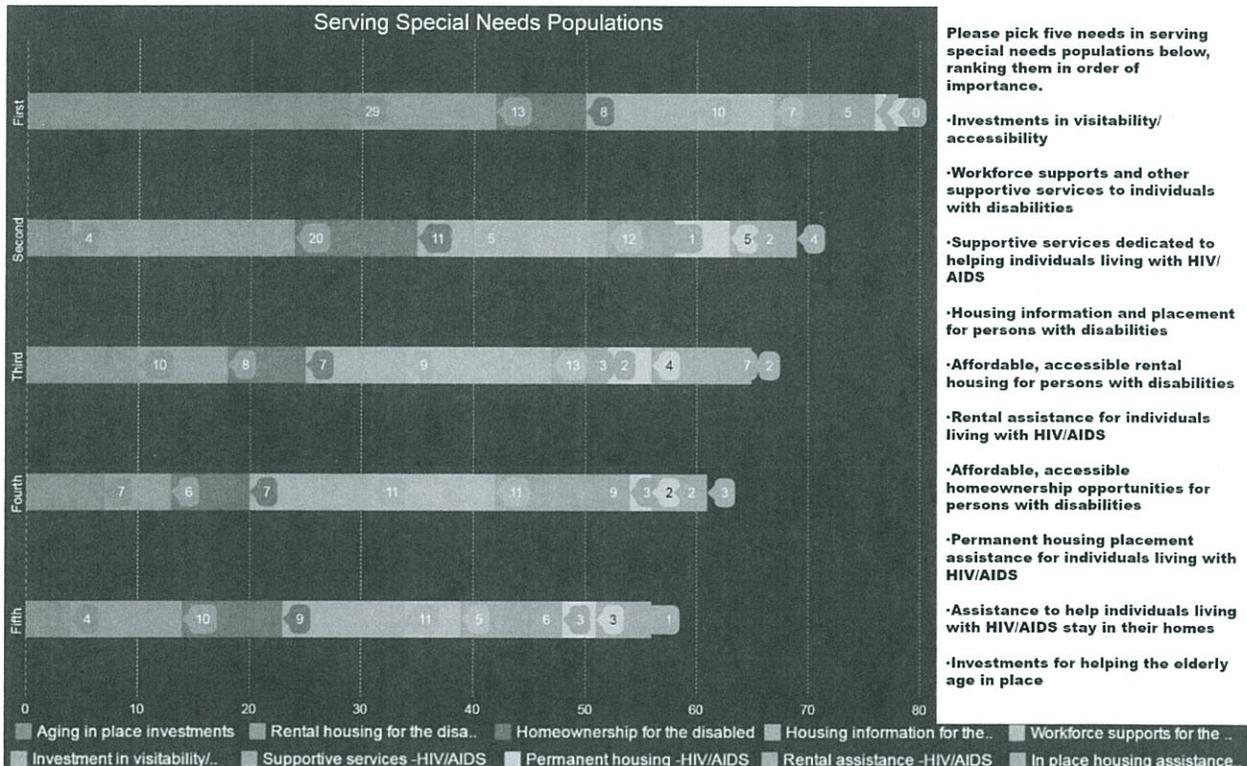
⁴ State of Homelessness in America 2015, National Alliance to End Homelessness, released April 1, 2015, http://www.endhomelessness.org/page/-/files/State_of_Homelessness_2015_FINAL_online.pdf

⁵ National Center on Family Homelessness, "America's Youngest Outcasts" 2014, <http://new.homelesschildrenamerica.org/mediadocs/280.pdf>

⁶ Shari Rudavsky, The Indianapolis Star March 26, 2015, "*Indiana OKs clean needle exchange amid HIV outbreak*" <http://www.usatoday.com/story/news/nation-now/2015/03/26/indiana-to-declare-health-emergency-for-hiv-outbreak/70478492/>

Last Spring, in a hearing about the needle exchange program, Rep. Terry Goodin, D-Austin, said his area has been asking for help dealing with its IV drug problem and lack of social services for years and that other communities with a similar lack of resources could find themselves facing a similar problem. As an example, he noted that an estimated 10 percent of the population of Austin, IN, or about 430 people, are thought to use intravenous drugs; and the outbreak in the region could climb to about 200, he said, or about half of all the IV drug users.

While much focus of assistance has been paid to Scott County, which the Plan points out is technically in the Kentucky HOPWA grant jurisdiction, there was a well-documented spread to Jackson County in Indiana's Region 11 last year. Since then, the Indiana University Rural Center for AIDS/STD Prevention issued indicators last year, providing suggestions regarding community need for Syringe Exchange Programming (SEP). They also released a list of counties at high risk for similar HIV outbreaks, based on Hepatitis C infections primarily, as well as substance abuse treatment episodes for heroin use and dependence, and the prescription drug overdose mortality rate. That document listed Allen, Blackford, Boone, Brown, Clark, Dearborn, Delaware, Fayette, Franklin, Grant, Greene, Hamilton, Hendricks, Howard, Jackson, Jasper, Jay, Jennings, Johnson, LaPorte, Lake, Madison, Marion, Martin, Miami, Monroe, Montgomery, Morgan, Newton, Parke, Porter, Pulaski, Putnam, Randolph, St. Joseph, Scott, Starke, Sullivan, Switzerland, Tipton, Union, Vanderburgh and Vigo counties as high risk under the various categories.



It would be well-advised to coordinate planning and funding with community centers and needle exchange operations that are already providing critical outreach to clients who would benefit from permanent housing

placement. Additionally, since last year, there are 23 counties in various phases of approval for Syringe Access Programming (SAP). Given the ongoing epidemic, Indiana must acknowledge the healthcare and community development impacts that will be felt throughout the state and make plans to respond to emerging needs – both emergency health care provisions and long-term supports.

It is critical for the Indiana Housing and Community Development Authority to consult shelter providers, health care professionals, needle exchange programs, community clinics and local units of government to assess what resources are available, what communities are experiencing, and inquire about up-to-date infection rates and what capacity building needs exist to ensure communities can provide for long-term housing needs. In order to receive adequate HOPWA funding to respond to an epidemic of new infections among housing unstable populations, IHEDA must demonstrate a command over data and an inclusive planning process responding to needs on the ground throughout the state to receive favorable consideration for increased funding.

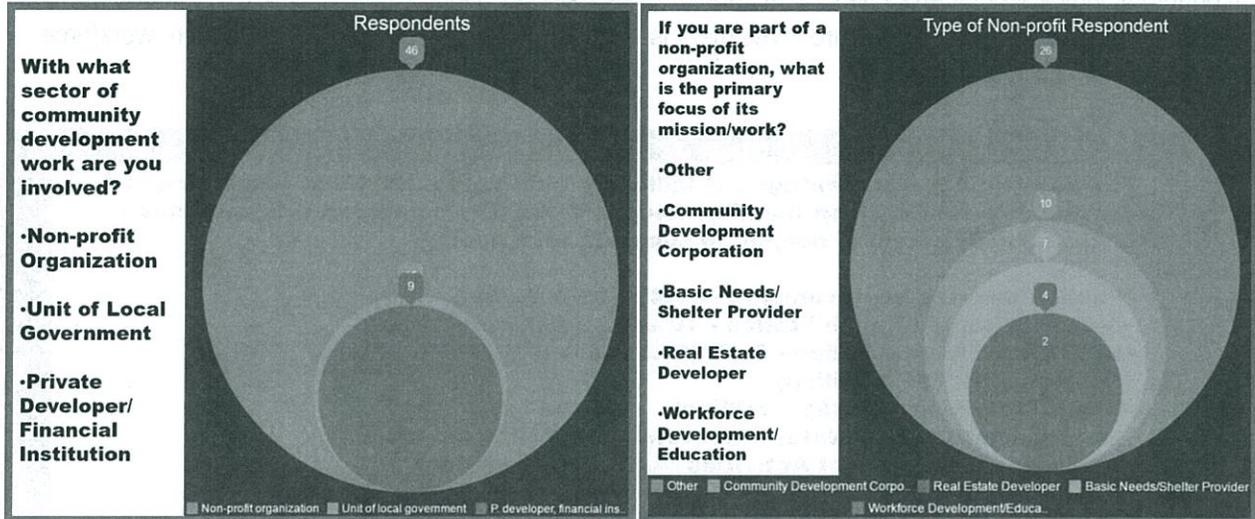
The Plan does not make any mention of this priority, which is of significant concern to IACED and our members. Greater resources will absolutely need to be a priority to empower communities that are and will be beyond staff and resource capacity to respond to this new crisis. As referenced on page 34 of the Plan, “If a distinct eligible population with specific needs exists in a region (for example, homeless men in Lake County), IHEDA will work with the regional subrecipient to tailor services to meet the needs of the population.”

INDIANA ASSOCIATION FOR COMMUNITY ECONOMIC DEVELOPMENT

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web: www.iaced.org | twitter: [@INCommDev](https://twitter.com/INCommDev) | facebook: facebook.com/INCommDev

8. SURVEY PARTICIPANTS

In order to provide context as to who participated in our survey, the graphs below detail sector segmentation. By far, the largest segment (70 percent) represented the non-profit community development sector. Those respondents were asked to further break down which part of that sector they represent.



9. NATIONAL HOUSING TRUST FUND PRIORITIZATION MOVING FORWARD

Our last comment is to express our interest in working with IHEDA throughout the process of stakeholder engagement in the development of plans for the upcoming allocation of Indiana's portion of National Housing Trust Fund resources. Since HUD has ruled that those resources should reflect the priorities from the Consolidated Plan and states will submit a substantial amendment to their Consolidated Plans in order to receive those resources, we want to ensure those plans reflect statewide priorities. Of particular interest to IACED is the development of a plan that addresses both non-entitlement communities, which Indiana's Consolidated Plan is solely focused on, and entitlement communities which are not addressed in the state Plan. We look forward to this process and the expansion of critical resources to serve Hoosiers in need.

On behalf of our dedicated membership affecting positive change in communities throughout the state, we would like to thank the Indiana Office of Community and Rural Affairs and the Indiana Housing and Community Development Authority for the opportunity to provide our comments for the 2016 Annual Action Plan.

Sincerely,

Kathleen Taylor
 Convener and Policy Director
 Indiana Association for Community Economic Development
 317-454-8536

March 23, 2016

24

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs One North Capitol – Suite 600
Indianapolis, IN 46204-2027
afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

My name is Sarah Coleman and I am an advocate for individuals with disabilities, specifically those who are blind or who have a visual impairment. I serve Marion County and the seven surrounding counties, working closely with these individuals in hopes that they may achieve and maintain independence, as well as quality of life despite the barriers they face as a result of their disability.

First, I would like to acknowledge the great efforts IHCDA has made to improve housing opportunities for persons with disabilities, their families, friends and allies.

Thank you for the requirements for visitable design, the improvement and expansion of universal design features in affordable rental housing and the Ramp Up program.

Without these improvements many of my constituents would be unable to find accessible housing for themselves, their family members or their friends. The visitable design further acknowledges the independent living philosophy of changing societal norms to view disabilities as a natural part of life, as opposed to something that needs to be fixed. It creates inclusive and diverse communities in which people of all abilities can live.

As the Action Plan is finalized for 2016 it is important to continue to improve Indiana's affordable housing. Listed below are a number of action items and recommendations for solutions in the 2016 Action Plan.

Action Item #1: Accessible units are not rented by people with disabilities.

In recent meetings with owners and property management representatives of tax credit and HUD funded housing developments, it has been noted that it is not uncommon to have persons who do not need the accessible units renting the units. The lack of marketing of accessible units is assumed to be a contributing factor to persons using wheelchairs not renting these units. In addition, a major barrier is the lack of affordability of these units for tenants with incomes of 20% - 30% AMI. Without rental subsidies people who use wheelchairs are continuing to be priced out of housing designed specifically to best accommodate their needs.

Recommendation #1: Rental subsidies must be tied to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI.

Action Item #2: Sustain and expand IHCDA's national leadership role in the implementation of Olmstead and the deinstitutionalization of persons with disabilities and seniors with conditions of aging.

Recommendation #1: Affirm the commitment to assure that persons with disabilities and older adults living in nursing homes and other institutions have access to integrated, affordable and accessible housing through the IHCDA Section 8 Housing Choice Voucher program. The state leadership for the Money Follows the Person program has shifted and with it an articulated commitment to integrated and affordable housing.

Recommendation #2: IHCDA should pursue integrated housing models that do not result in the clumping of persons with low income, persons with disabilities, or aging seniors. True diversity and inclusion is in affordable and accessible housing that includes mixed income, all abilities, and ages.

Action Item #3: To affirmatively further fair housing, increase the availability of integrated and accessible rental housing that is affordable for people with disabilities and SSI Incomes (about 18% of Area Median Income).

Recommendation #1: A major barrier in the attainment of affordable housing for persons with disabilities living strictly on SSI income is the lack of affordability of LIHTC units for those with incomes of 30% AMI. Rental subsidies need to be tied to these units or they need to be designed to be affordable at the 20% or below AMI. Low income housing tax credit properties (LIHTC), the fastest growing affordable housing for more than a decade, has often been unaffordable for those with SSI incomes – people with disabilities are often “priced out” of this housing market.

Recommendation #2: Partner with public housing authorities and participate in other rental subsidy strategies that promote integrated housing (people with and without disabilities or “special needs” living in the same development; economic integration) is needed to assure that those with very low incomes receive a fair share of all integrated and affordable housing units.

Again, I want to commend the IHCDA on all of its efforts towards improving housing opportunities and creating more inclusive and diverse communities. Thank you for the opportunity to comment on a subject that strongly effects all of my constituents.

Sarah Coleman
Scurbur@yahoo.com
317-440-4496

Heidi Aggeler

25

From: Jesusa Rivera <JesusaR@proteusinc.net>
Sent: Tuesday, March 22, 2016 2:41 PM
To: Heidi Aggeler
Subject: Ihcda comment

Indiana needs to restore funding for Migrant Farmworker housing. For example, when forced to find housing on their own, migrants often find themselves in a cost burdened situation, where over 30% of their income goes to pay for housing (most earn only minimum wage with no benefits). This situation often leads to overcrowding to try to off-set the housing expense (two families sharing one apt or 6 workers living in a 2 bedroom apt.)

Other issues with housing are: 1 year lease required, high damage deposits and rents, transportation issues from city housing to rural farm fields, inability to connect to services due to long work days, etc. most of the migrant farmworkers are in Indiana to plant and harvest food crops, like in fruits and vegetables. With "farm to plate" becoming a hot topic, I have found making that connection has helped clarify the role farmworkers play in local food production. 85% of our fruits & vegetables are still handpicked. Apples and watermelon are two crops that are handpicked in Indiana. As the cost of food production rises, many farmers are finding it difficult to maintain the on-farm housing they have, let alone build new housing.

Many of the on-farm housing units currently being used were built in the 1940s & 50's and are nothing more than sheds without running water, heat or AC. Some don't even have finished interiors. They are just bare stud walls and underlayment floors.

National Farmworker Awareness Week is March 24-31, 2016

Jesusa Rivera
Case Manager
Proteus, Inc.
574-855-5326

Sent by [Outlook](#) for Android

Heidi Aggeler

26

From: Terry Moreland <terrymoreland26@yahoo.com>
Sent: Tuesday, March 29, 2016 12:08 PM
To: Angel Foster
Subject: In regards to Terry Moreland comments

March 29, 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

My name is Terry Moreland. I work with the Southwest team of Back Home in Indiana Alliance.

First, I would like to acknowledge the great efforts IHCDMA has made to improve housing opportunities for persons with disabilities, their families, friends and allies.

Thank you for the requirements for visitable design, the improvement and expansion of universal design features in affordable rental housing and the Ramp Up program.

People getting out of military cannot get around in the tract chairs in their own homes. Visitability helps tremendously with this. Smart phones are another advantage that the veterans have they can open doors.

The Ramp Up Program will help with the very long waiting lists for ramps to existing homes that need the modification.

As the Action Plan is finalized for 2016 it is important to continue to improve Indiana's affordable housing. Listed below are a number of problems and recommendations for solutions in the 2016 Action Plan.

#1. Accessible Units Not Rented By People with Disabilities. In recent meetings with owners and property management representatives of tax credit and HUD funded housing developments, it has been noted that it is not uncommon to have persons who do not need the accessible units renting the units.

The lack of marketing the accessible units is assumed to be a contributing factor to persons using wheelchairs not renting these units. In addition, a major barrier is the lack of affordability of these units for tenants with incomes of 20 % - 30% AMI. Without rental subsidies people who use

wheelchairs are continuing to be priced out of housing designed specifically to best accommodate their needs.

RECOMMENDATION #1: Rental subsidies must be tied to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI.

#2: MFP and Housing. To date, the Indiana Department of Aging (DOA) and the associated Money Follows the Person (MFP) have had limited transition outcomes to integrated housing & community based supports for persons exiting nursing homes. Although IHCD provided a Housing Choice Voucher preference for MFP participants, DOA has largely not assisted their constituents to access these rental subsidies.

The DOA and MFP leadership shifted in January 2016 and with has come it an articulated commitment to facilitating increased opportunities for integrated and affordable housing and home & community based supports.

RECOMMENDATION # 2. Hold fast to IHCD's leadership role in the implementation of Olmstead and the deinstitutionalization of persons with disabilities of all ages. Indiana must use ConPlan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing (people with and without disabilities in the same development; economic integration) is needed.

#3: Homeownership is Out of Reach. Ground was lost in Indiana's homeownership opportunities for persons with disabilities and low incomes during the recent housing crisis. The IHCD Section 8 Homeownership Program and the \$10,000 in down payment assistance for persons with disabilities were eliminated.

RECOMMENDATION # 3

Re-establish the Section 8 Homeownership Program within the IHCD Single Family Housing Department.

Re-establish up to \$10,000 in down payment assistance for persons with disabilities and low incomes to assure participation in affordable home ownership opportunities.

#4 Good quality market rental housing is not affordable for persons with SSI incomes in Indiana and throughout our nation.* Low income housing tax credit properties (LIHTC), the fastest growing affordable housing for more than a decade, has often been unaffordable for those with SSI incomes – people with disabilities are often “priced out” of this housing market.

RECOMMENDATION # 4:

Indiana must use Consolidated Plan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing (people with and without disabilities or “special needs” living in same development; economic integration) is needed to assure that those with very low incomes receive a fair share of all integrated and affordable housing units.

* Source: Priced Out. The Housing Crisis for People with Disabilities by Emily Cooper, Henry Korman, Ann O'Hara and Andrew Zovistoski. Technical Assistance Collaborative, Inc. and Consortium for Citizens with Disabilities. Boston, Mass. April 2009. For the full Priced Out report more see: www.tacinc.org Click on Publications

Finally; it is important to acknowledge the first outcomes of the newly established incentives for integrated supportive housing within the Low Income Housing Tax Credit program. It is exciting to see housing developers step forward with community partners to establish the first two integrated supported housing models in Valparaiso and Indianapolis.

26 cont

We look forward to continuing to work with you.
Thank you for this opportunity,

Terry Moreland
Southwest Team, Back Home In Indiana Alliance
802 Eisenhower CIRCLE
Vincennes IN 47591
(812) 8866051 terrymoreland26@yahoo.com

Heidi Aggeler

From: Nathan Held <nathan@ind15rpc.org>
Sent: Tuesday, March 29, 2016 7:12 AM
To: Angel Foster
Cc: Lisa Gehlhausen
Subject: Indiana 2016 Annual Action Plan Comments

Please note on Table 2, page 9,- Indiana 15 Regional Planning Commission participated in the November 4, 2015 listening session held in Washington, IN. Please add as a participating organization.

Comments on the draft Action Plan:

- 1) We would like to see a reduction in local match requirements for WDW projects falling within Tier 3, and possibly Tier 2 (projects with high LMI).
- 2) Reinstate funding for fire trucks. Many rural volunteer fire departments operating on tight budgets have vehicles that are 25+ years old. CDBG funding was one of the very few resources these departments could turn to.
- 3) BCP should include points for all brownfield sites with assessment reports (including EPA and IDEM assigned numbers), and not limited to IFA registry.

Nathan Held
Senior Project Administrator
Indiana 15 Regional Planning Commission
221 E. First Street
Ferdinand, IN 47532
Phone: (812) 367-8455
Fax: (812) 367-8171
www.ind15rpc.org

4:40 PM email
on 3/31/16
28

Scott, Corrie

From: Tara Clancey Ozes <tara.clanceyozes@gmail.com>
Sent: Thursday, March 31, 2016 3:30 PM
To: Scott, Corrie
Subject: 2016 Indiana Action Plan - Housing for Migrant/Seasonal Farmworkers

RECEIVED
MAR 31 16
Community &
Rural Affairs

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

To Whom it May Concern:

I am writing to express my concern for the housing situation of migrant and seasonal farmworkers in Indiana. It is imperative that CDBG funding be allocated to improve these housing conditions, which oftentimes are so deplorable that they are an insult to human dignity. These workers are the life-blood of the state of Indiana, and they often do not have the power or time to advocate on their own behalf. For this reason, I would like to advocate that funding go to improve this situation as part of the 2016 Action Plan. Thank you very much.

Sincerely,

Tara Clancey Ozes

--
Tara Clancey Ozes, J.D.
Class of 2015
Indiana University, Maurer School of Law
tara.clanceyozes@gmail.com | (530) 908-6000

4:40 PM - reply

Scott, Corrie

From: Scott, Corrie
Sent: Thursday, March 31, 2016 4:43 PM
To: 'Tara Clancey Ozes'
Subject: RE: 2016 Indiana Action Plan - Housing for Migrant/Seasonal Farmworkers

Dear Tara,

Thank you for expressing your interest in the 2016 Action Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2016 Consolidated Plan to the U.S. Department of Housing and Urban Development.

Please feel free to contact our office should you have any questions.

Sincerely,
Corrie

Corrie Scott, CAP-OM



Administrative Assistant
Office of Community and Rural Affairs
Desk: 317.233.3762
Email: coscott@ocra.in.gov
Follow us on [Twitter](#) and [Facebook](#).

From: Tara Clancey Ozes [mailto:tara.clanceyozes@gmail.com]
Sent: Thursday, March 31, 2016 3:30 PM
To: Scott, Corrie
Subject: 2016 Indiana Action Plan - Housing for Migrant/Seasonal Farmworkers

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

To Whom it May Concern:

I am writing to express my concern for the housing situation of migrant and seasonal farmworkers in Indiana. It is imperative that CDBG funding be allocated to improve these housing conditions, which oftentimes are so deplorable that they are an insult to human dignity. These workers are the life-blood of the state of Indiana, and they often do not have the power or time to advocate on their own behalf. For this reason, I would like to advocate that funding go to improve this situation as part of the 2016 Action Plan. Thank you very much.

Sincerely,

Tara Clancey Ozes

--
Tara Clancey Ozes, J.D.
Class of 2015
Indiana University, Maurer School of Law
tara.clanceyozes@gmail.com | (530) 908-6000

Heidi Aggeler

29

From: Brian Rodgers <swordsman90@hotmail.com>
Sent: Monday, March 28, 2016 1:30 PM
To: jsipe@ihcda.in.gov; Angel Foster
Subject: Public Input for ConPlan 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

My name is Brian Rodgers and I am a Hoosier with a disability and a member of the Richmond team of the Back Home in Indiana Alliance. I am also a volunteer for the Independent Living Center of Eastern Indiana.

First, I would like to acknowledge the great efforts IHEDA has made to improve housing opportunities for persons with disabilities, their families, friends and allies.

Thank you for the requirements for visitable design, the improvement and expansion of universal design features in affordable rental housing and the Ramp Up program.

I know, at the Independent Living Center of Eastern Indiana, they often receive requests for funding home modifications especially ramps, kitchen and bathroom modifications. They have a ramp program with a lengthy waiting list because they are the only organization in their seven county catchment area who can provide ramps to people in need. Since October 1, 2015, they have provided 27 ramps, and have over 20 people who are desperately waiting for ramps.

Many of their Consumers are in rental properties and need of funding that can be used towards home modifications in these types of properties.

As the Action Plan is finalized for 2016 it is important to continue to improve Indiana's affordable housing. Listed below are a number of problems and recommendations for solutions in the 2016 Action Plan.

CONCERN #1. Accessible Units Not Rented By People with Disabilities. In recent meetings with owners and property management representatives of tax credit and HUD funded housing developments, it has been noted that it is not uncommon to have persons who do not need the accessible units renting the units.

The lack of marketing the accessible units is assumed to be a contributing factor to persons using wheelchairs not renting these units. In addition, a major barrier is the lack of affordability of these units for tenants with incomes of 20 % - 30% AMI. Without rental subsidies people who use wheelchairs are continuing to be priced out of housing designed specifically to best accommodate their needs.

RECOMMENDATION: Rental subsidies must be tied to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI.

CONCERN #2: MFP and Housing. To date, the Indiana Department of Aging (DOA) and the associated Money Follows the Person (MFP) have had limited transition outcomes to integrated housing & community based supports for persons exiting nursing homes. Although IHCD provided a Housing Choice Voucher preference for MFP participants, DOA has largely not assisted their constituents to access these rental subsidies.

The DOA and MFP leadership shifted in January 2016 and with has come it an articulated commitment to facilitating increased opportunities for integrated and affordable housing and home & community based supports.

RECOMMENDATION: Hold fast to IHCD's leadership role in the implementation of Olmstead and the deinstitutionalization of persons with disabilities of all ages. Indiana must use ConPlan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing (people with and without disabilities in the same development; economic integration) is needed.

CONCERN #3: Homeownership is Out of Reach. Ground was lost in Indiana's homeownership opportunities for persons with disabilities and low incomes during the recent housing crisis. The IHCD Section 8 Homeownership Program and the \$10,000 in down payment assistance for persons with disabilities were eliminated.

RECOMMENDATION:

- a. **Re-establish the Section 8 Homeownership Program** within the IHCD Single Family Housing Department.
- b. **Re-establish up to \$10,000 in down payment assistance** for persons with disabilities and low incomes to assure participation in affordable home ownership opportunities.

Finally, it is important to acknowledge the first outcomes of the newly established incentives for *integrated supportive housing* within the Low Income Housing Tax Credit program. It is exciting to see housing developers step forward with community partners to establish the first two integrated supported housing models in Valparaiso and Indianapolis.

We look forward to continuing to work with you.
Thank you for this opportunity,

Brian Rodgers
Richmond, Indiana
-47374-
(765) 967-8590

Heidi Aggeler

From: Ann Barnhart <AnnB@ilcein.org>
Sent: Monday, March 28, 2016 1:54 PM
To: jsipe@ihcda.in.gov; Angel Foster
Subject: Public Input for Conplan 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

My name is Ann Barnhart. I am a Hoosier with a disability, a member of the Richmond Back Home in Indiana Alliance team, and the Compliance Manager at the Independent Living Center Of Eastern Indiana. We work with people with disabilities of all ages.

First, I would like to acknowledge the great efforts IHCD A has made to improve housing opportunities for persons with disabilities, their families, friends and allies.

Thank you for the requirements for visitable design, the improvement and expansion of universal design features in affordable rental housing and the Ramp Up program.

The Independent Living Center of Eastern Indiana often receives requests for funding of home modifications especially ramps, kitchen, and bathroom modifications. We have a ramp program with a lengthy waiting list. We are the only organization in our 7 county catchment area who provides ramps to people in need. Since October 1, 2015, we have provided 27 ramps, and have over 20 people who are desperately waiting for ramps.

Many of our consumers are also live in rental properties and are in need of funding that can be used towards home modifications in homes they do not own.

As the Action Plan is finalized for 2016 it is important to continue to improve Indiana’s affordable housing. Listed below are a number of problems and recommendations for solutions in the 2016 Action Plan.

CONCERN #1. Accessible Units Not Rented By People with Disabilities. In recent meetings with owners and property management representatives of tax credit and HUD funded housing developments, it has been noted that it is not uncommon to have persons who do not need the accessible units renting the units.

The lack of marketing the accessible units is assumed to be a contributing factor to persons using wheelchairs not renting these units. In addition, a major barrier is the lack of affordability of these units for tenants with incomes of 20 % - 30% AMI. Without rental subsidies people who use wheelchairs are continuing to be priced out of housing designed specifically to best accommodate their needs.

RECOMMENDATION: Rental subsidies must be tied to the units designed to meet the housing needs of persons using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI.

CONCERN #2: MFP and Housing. To date, the Indiana Department of Aging (DOA) and the associated Money Follows the Person (MFP) have had limited transition outcomes to integrated housing & community based supports for persons exiting nursing homes. Although IHCD provided a Housing Choice Voucher preference for MFP participants, DOA has largely not assisted their constituents to access these rental subsidies.

The DOA and MFP leadership shifted in January 2016 and with has come it an articulated commitment to facilitating increased opportunities for integrated and affordable housing and home & community based supports.

RECOMMENDATION: Hold fast to IHCD's leadership role in the implementation of Olmstead and the deinstitutionalization of persons with disabilities of all ages. Indiana must use ConPlan, Section 8, LIHTC and Continuum of Care related resources, in addition to potential HUD Section #811 funds, for increased rental subsidies. Partnerships with public housing authorities and other rental subsidy strategies that promote integrated housing (people with and without disabilities in the same development; economic integration) is needed.

CONCERN #3: Homeownership is Out of Reach. Ground was lost in Indiana's homeownership opportunities for persons with disabilities and low incomes during the recent housing crisis. The IHCD Section 8 Homeownership Program and the \$10,000 in down payment assistance for persons with disabilities were eliminated.

RECOMMENDATION:

- a. **Re-establish the Section 8 Homeownership Program** within the IHCD Single Family Housing Department.

- b. **Re-establish up to \$10,000 in down payment assistance** for persons with disabilities and low incomes to assure participation in affordable home ownership opportunities.

Finally, it is important to acknowledge the first outcomes of the newly established incentives for *integrated supportive housing* within the Low Income Housing Tax Credit program. It is exciting to see housing developers step forward with community partners to establish the first two integrated supported housing models in Valparaiso and Indianapolis.

We look forward to continuing to work with you.
Thank you for this opportunity,

Ann Barnhart
Compliance Manager

Independent Living Center of Eastern Indiana
1818 West Main Street
Richmond, Indiana 47374
(765) 939-9226 Ext 103

30-cent

March 28, 2016

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov

2016 Action Plan
Indiana Office of Community & Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027
afoster@bbcresearch.com

Dear Mr. Sipe and Ms. Foster,

My name is Danny Grissom, Home Modification Coordinator for The Wabash Independent Living and Learning Center in Terre Haute, Indiana. I am also a member of Back Home In Indiana Alliance.

First of all, I would like to take this opportunity to say thank you for the great efforts that IHCD has made to improve housing opportunities for persons with disabilities and their families.

One of the major issues for people with disabilities has been and continue to be finding accessible units that is affordable. Without rental subsidies people who use wheelchair continue to be price out of housing designed to best accommodate their needs. These units are often being rented to individuals who are not in wheelchairs. These units need to be available to persons using wheelchairs at an affordable price who are at 20% or below AMI.

Another area of concern is home ownership. Many persons with disabilities don't have the ability to purchase their own homes. Persons who receive fixed incomes such as SSI or SSDI often cannot afford the required down payment for a home. There is a need to re-establish the down payment assistance for persons with disabilities and low income to assure participation in affordable home ownership.

The number of accessible housing for persons with disabilities continues to be an issue. As new single family homes, duplexes and triplexes are constructed, there needs to be more requirements in the numbers of these structures that are accessible. Not only would this provides more opportunities for persons with disabilities, it would also benefit the changing needs of families over time.

HA

The recently announced accessibility modification program "Ramp UP", is a major step forward in meeting the needs of persons with disabilities. AS a Home Modification Coordinator for an Independent Living Center, I can say that the program will have a major impact not only for persons with disabilities, but also for the elderly. During the past four years, The Wabash Independent Living and Learning Center has constructed more than 100 wheelchairs in our community and surrounding area. For many of these individuals, it means the difference in remaining in their homes and not forced to go to a nursing home. Even with over a hundred wheelchair ramps built, there continues to be such a need. At the present time, we currently have over 45 individuals on the waiting. Due to the fact that all of the ramps are built by community volunteers and only have material cost, the money received from IHEDA Ramp Up Program will provide us with the funding to construct an additional 30 to 35 ramps in Terre Haute and surrounding counties.

Thanks you for your responsiveness for our concerns and recommendations regarding access for persons with disabilities.

Sincerely,

Danny Grissom
Home Modification Coordinator
The Wabash Independent Living and Learning Center
1 Dreiser Square
Terre Haute, IN 47807
812 298 9455
d. grissom@thewillcenter.org

CDBG OOR Public Comments

1. Page 1: Grant
 - a. HAND
 - b. The application specifies that the program provides “subsidies in the form of grants to selected applicants for the rehabilitation of owner-occupied housing for low to moderate-income people.” Will IHCDCA permit a nonprofit applicant to establish a loan program whereby homeowners repay a portion of the funds? HAND believes this is both pragmatic and culturally appropriate, as homeowners are more likely to invest in the project if they’re contributing financially. Despite local support for such a policy, we abstained from initiating it as part of the program because of IHCDCA’s restriction. We primarily need to know if this will be considered, and whether IHCDCA will work with us to establish reasonable guidelines.
 - c. **IHCDCA response: IHCDCA will research the establishment of a loan program for eligible organizations to better understand the HUD regulatory guidelines for the creation of such a Policy.**

2. Page 5: CDBG Entitlement Communities
 - a. HAND
 - b. The clarification of non-entitlement communities within Hamilton County is not accurate. The towns of Sheridan, Arcadia, Atlanta and Cicero have all opted out of the County’s Entitlement. Therefore, they are all eligible for CDBG funds. All housing activity within these communities should be eligible.
 - c. **IHCDCA response: The Policy clarifies Sheridan, Arcadia, Atlanta and Cicero are no longer in Hamilton County’s Entitlement, and are thus eligible for CDBG funds. Documentation has been provided by HUD.**

3. Page 6: CDBG-D OOR Funds
 - a. HAND
 - b. Will there be a place on the application to specify that a request is for CDBG-D funding specifically? Our concern would be that we’d include applicants from an entitlement community but would be eliminated due to the CDBG ineligibility. Also, the letters of support we collect will need to specify the correct funding source, so this clarity will be appreciated.
 - c. **IHCDCA response: Due to the geographic restrictions of both CDBG and CDBG-D, IHCDCA staff will make the determination on the appropriate source of funding.**

4. Page 8: 3.1 Eligible Activities
 - a. Insight 2000, Inc.
 - b. Under “life estates” - what happens if a person, during the affordability period, is placed in a nursing home or goes to live with a family member and no longer lives in the house? What happens if the house is not sold during the affordability period and the children decide to keep it while the parent is still living?
 - c. **IHCDCA response: Under the life estate policy, the primary owner must have the right to live in the housing for the remainder of his or her life, and not pay rent. If the owner is unable to live in the house for the remainder of the period of affordability, the owner must repay the CDBG funds.**

5. Page 14: Eligible Activity Costs:
 - a. HAND
 - b. Construction management (ie. spec writing, estimating, inspections) needs to be claimable as a Rehab expense. This service costs 8-10% alone and is a legitimate hard cost. With this and Lead, there is only 6-7% of the funds remaining for Client Intake and Administration. The cap for Program Delivery either needs to increase to 25-30% to afford Construction Management service, or it needs to be an eligible Hard Cost. Please adjust the limits accordingly. The City of Indianapolis allowed CM services to be an eligible Hard Cost.
 - c. **IHCDA response: Construction management, if provided by a third party, is an eligible cost under the rehabilitation line-item.**

6. Page 20: Threshold Checklist
 - a. HAND
 - b. The following sentence, "Match must be committed prior to submitting an application for CDBG and CDBG-D OOR funding to IHCDA and to pass threshold review," should be highlighted in the application and notification of changes. This is a substantial change and requires an entity to secure commitments of \$30-35,000 in order to apply. Two of us almost missed it entirely, and even upon finding it, see it as an absolutely tremendous mountain to climb. Please remove this from threshold or clarify whether banked match (CDBG and HOME) are eligible.
 - c. **IHCDA response: Banked match is eligible.**

7. Page 21: Summary of Updates:
 - a. ARA
 - b. Summary of Updates states that the 40% AMI population for points has been removed. However in the Application Policy, it is included.
 - c. **IHCDA response: The 40% AMI population for points has been removed in the application policy.**

8. Page 21: Scoring
 - a. Insight 2000, Inc.
 - b. Would be possible to change the minimum score from 40 to 30 points? With only 63 possible points (58 points without bonus) I could see where a community may have difficulty just meeting the minimum threshold requirement.
 - c. **IHCDA response: The minimum scoring threshold has remained at 40 points to support the funding priorities of utilizing the CDBG funds. Applicants need to only meet 66% of the total possible points available to be eligible for funds.**

9. Page 22: Underserved Communities
 - a. HAND
 - b. There has been one award for Home Repair in Hamilton County, and by this criteria, our program would be disadvantaged by 3 points. Our program serves 4 towns, 4 cities, and a large unincorporated area, so the completion of 16 home repairs when there's a wait-list should not reduce the likelihood of funding. The wait-list should

represent an underserved population, and non-profits should be eligible for receiving these points.

- c. **IHCDA response: “Undeserved Community” has been changed to “Community without Recent OOR award”. Points will be awarded to a town, city or county that has not received an OOR award within the last five years. Both Local Unit of Governments and Non-Profits are eligible.**

10. Page 22: Client Intake

- a. HAND
- b. HAND uses a 2 stage application process where a homeowner submits their calculation of income first, and then provides verification when funds are available and the project is ready to be initiated. Since applicants often wait a year or more, collecting documentation and income verification is unnecessary and intrusive. We believe it is an effective customer management practice, and keeps what would otherwise be an onerous administrative burden, while still providing a decent screening measure. Does income verification mean documentation is on file, or will a homeowner’s self-assessment qualify? Please remove the income verification and lower the burden from 76% for maximum points.
- c. **IHCDA response: Client intake procedures have been expanded. Client intake means that potential clients have been identified, are interested in participating in the OOR program, and have certified their income within twelve months of application date. A complete income verification is not required, but please provide the best estimate of the household's annual income after initial interview/contact. If full income verification has been completed, clients must be appropriately income-verified per the HUD Part 5 definition.**

11. Page 22: Client Intake

- a. Insight 2000, Inc.
- b. Client Intake - the statement that reads “ ... and are income verified.” Is it possible to reword that slightly? Income verification is only good for six months. By the time a grant is awarded, all the verifications will have expired.
- c. **IHCDA response: IHCDA response: Client intake procedures have been expanded. Client intake means that potential clients have been identified, are interested in participating in the OOR program, and have certified their income within twelve months of application date. A complete income verification is not required, but please provide the best estimate of the household's annual income after initial interview/contact. If full income verification has been completed, clients must be appropriately income-verified per the HUD Part 5 definition.**

12. Page 24: Certifications

- a. ARA
- b. It is unclear how the 6 points possible will be awarded, specifically.
- c. **IHCDA response: The certification requirements have been clarified to demonstrate how the applicant can be awarded six points. Points will be awarded to applications which include an applicant or administering entity with a staff member or staff**

members who have received the certifications. Three points will be awarded for the completion of one of the certifications listed below by a staff member of the administering entity. Six points will be awarded for the completion of two certifications listed below by a staff member or staff members of the administering entity. If two staff members hold the same certification, points will be awarded for two certifications.

13. Page 24: Experience

- a. ARA
- b. Experience category indicates that an entity with no previous IHCD award experience could receive 3 points if requested documentation is received. It reads as though only those with no experience could receive the points (thus experience administrators lose those 3 points).
- c. **IHCD Response: The category has been redefined as “New Administrator”. Administrating entities with previous IHCD award experience are not eligible to receive points in this category, but are eligible to receive up to 10 points under the “Administering Entity’s IHCD Award Performance” category.**

14. Page 26: Public and Private Participation

- a. HAND
- b. One of the best sources of match for this program is the Neighborhood Impact Program (NIP) offered by FHLBI and member banks. There are challenges to accessing these funds (significant underwriting criteria along with no financial support), but it’s a powerful 4 to 1 matching grant. Please allow member banks to pledge access to NIP funds, and for this to be counted as an eligible form of “Non-Public Funds.” These pledges incentivize banks to partner with us, and can be a powerful tool for substantial leverage. I believe administrative support from IHCD could significantly ramp up participation in the NIP program.
- c. **IHCD Response: NIP is eligible as leveraging under “Non-Public Funds”.**

15. Page 26: Financing:

- a. Insight 2000, Inc.
- b. My greatest concern is with this item having 12 points in the overall point system. Some counties/cities/towns have an abundance of wealth due to casinos (and other) sources revenues. Many times, what they choose to spend their money on is at the sole discretion of the local unit of government, community foundation, etc. It would be somewhat painless for them to come up with small match for a grant award that may award them \$350,000. Other counties or cities may not have money for the police department and are laying off individuals due to lack of funds. HUD does not require a financial match for the CDBG program. Entitlement communities do not have to provide a match for their CDBG funding. By allotting 12 points for this category, it constitutes about 20% of the whole scoring process. I would like to request that this section be reconsidered.
- c. **IHCD Response: The number of points under Public Participation and Non-Public Participation in Section 6.4 has been decreased from six to five points for each category.**

16. _Timely Expenditure of Funds

- a. ARA
- b. Would IHCDCA consider the grant period to be extended to 24 months (as OCRA). This may alleviate the needed extensions request due to weather, seasonal glitches.
- c. **IHCDCA Reponse: The length of a CDBG OOR agreement is currently at 18 months. Extensions may be awarded at the behest of IHCDCA.**

17. Non-Public Participation

- a. ARA
- b. We would suggest IHCDCA consider “shared match” as “donation” in this category, and that points could be awarded as such.
- c. **IHCDCA Response: Shared Match is not eligible as a donation for points under the Non-Public Monetary Participation. Match (with the potential for the use of bank match) is required for threshold.**

Comments from Public Hearings and Written Comments:

- 1. OOR priority for seniors
 - a. KW Consultants
 - i. Will IHCDCA continue to prioritize the owner-occupied rehabilitation program for seniors?
 - b. **IHCDCA response: There is no preference for types of homeowners under the CDBG/-D OOR program. Major systems repairs, and repairs needed for the safety of the homeowner must be met.**
- 2. Migrant/seasonal farmworker housing:
 - a. Indiana Coalition Against Domestic Violence
 - i. Housing conditions for migrant farmworkers are terrible; recommend allocating CDBG for migrant/seasonal housing
 - b. Indiana Migrant and Seasonal Farmworker Coalition
 - i. Reliance on employers for housing exacerbates vulnerability to exploitation; those who find their own housing are cost burdened; a lack of housing near farms leads to overcrowding in the existing housing (geographic barrier); closest housing is often 1 hour away; request restoration of funding for migrant farmworker housing
 - c. Proteus
 - i. Request restoration of funding for Indiana’s migrant seasonal housing; Proteus is a voice for farmworkers, who have limited English proficiency (LEP) and long work hours prevent participating in public hearings; migrants are cost burdened; the closest housing can be 1 hour away; in 2015 more than 1,000 corn detasslers in northern Indiana stayed in dilapidated motels serving as unlicensed labor camps; many shared space (even beds) with strangers; in Knox County, workers slept in their vans; workers in Jackson County slept on a laundry room floor
 - d. Jesusa Rivera, Proteus, Inc
 - i. Restore funding for migrant farmworker housing; other challenges—landlords require 1 year lease, high damage deposit and rents; transportation issues from city housing to rural farm fields; long work days make it difficult to access

services during provider business hours; many on-farm housing units are sheds built in the 40s and 50s with no running water, heat or A/C.

- e. Herron School of Art and Design, Youngbok Hong
 - i. Restore funding for seasonal and migrant farmworkers; workers in detasseling season live in an overcrowded hotel; some are living 7 to a room; some sleep on the laundry room floor; the hotel is infested with bedbugs; a labor contractor holds the key for 10 women who are sharing a room, while male workers have their own key; the labor worker has been accused of trafficking individuals in the past; a labor camp in July houses 300 men in an old school; 30 port-o-pot toilets on trailers serve as bathroom facilities
- f. Matthew Fuss
 - i. Allocate CDBG funding for migrant/seasonal farmworker housing; living conditions are reminiscent of a third world country; housing conditions are terrible
- g. Annie Poole
 - i. Currently no funding for migrant farmworker housing; 2) recommend using CDBG for growers to use for developing farmworker housing—with County Commissioner permission; these workers must have decent and safe housing and no other funds are available
- h. Tara Clancey Ozes, J.D.
 - i. Recommend using CDBG to improve migrant and seasonal farmworker housing conditions, which are often deplorable.
- i. **IHCDA Response: Through the Citizen Participation process, the need for Owner Occupied Rehabilitation was identified as high. With the amount of available CDBG funds not increasing, IHCDA is will to explore migrant farmer worker hosing through several low-interest loan programs – CEED or the Development Fund.**

3. Disability

- a. Attic, Inc. (Independent Living Center)
 - i. 1) Accessible units not rented by persons with disabilities—non-disabled persons rent accessible units in tax credit and HUD funded developments; most of these units would be unaffordable to individuals with incomes of 20%-30% AMI; rental subsidies are needed for persons who use wheelchairs to afford housing designed to accommodate their needs; recommendation: rental subsidies should be attached to the units designed to meet the housing needs of persons using wheelchairs or LIHTC accessible units should be affordable at 20% or below AMI; 2) Money Follows the Person (MFP) and Housing—although IHCDA provides Section 8 voucher preference for MFP, the Department of Aging (DOA) has helped constituents access the vouchers; recommendation: hold fast to IHCDA's leadership role in implementing Olmstead and deinstitutionalization; 3) homeownership is out of reach for persons with disabilities; recommendation: re-establish the Section 8 Homeownership program within IHCDA single family housing department and re-establish up to \$10,000 in down payment assistance for low income persons with disabilities; 4) two integrated supported housing models developed in Valparaiso and Indianapolis using integrated supportive housing deserve recognition. IHCDA should: 1) support accessibility requirement education and enforce compliance with these standards in all housing units funded in part or through IHCDA; 2) maintain

commitment to ensure persons with disabilities in nursing homes and affiliated with MFP have access to integrated housing through IHCD's Section 8 voucher program; 3) re-establish increased down payment assistance for low income persons with disabilities to participate in affordable homeownership; the Annual Report should include: 1) rental subsidies must be tied to the units designed to meet the housing needs of persons with disabilities or LIHTC accessible units should be affordable at 20% or below AMI; thank you for visitable design requirements and universal design features in affordable rental housing

- b. The League for the blind and disabled inc.
 - i. Issues: 1) Accessible units are not rented by people with disabilities, recommend rental subsidies be tied to units designed to meet housing needs of people using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI; 2) MFP and Housing—DOA has not helped constituents access rental subsidies, recommend hold fast to IHCD's leadership role in Olmstead implementation and use Con Plan, section 8, LIHTC and Continuum of Care related resources in addition to potential HUD Section 811 funds for increased rental subsidies and partnership with public housing authorities to promote integrated housing; 3) homeownership is out of reach, recommend re-establishing the Section 8 Homeownership program with the IHCD Single Family Housing Department and re-establish up to \$10,000 in down payment assistance for low income persons with disabilities
- c. Carolina Mora, resident with a disability
 - i. Problems and recommendations: 1) many people with SSI incomes cannot afford housing, recommend more accessible units for people with incomes 20% of AMI or lower; increase affordable options for people moving out of nursing homes; 2) take better steps to enforce fair housing laws especially as relates to reasonable accommodation and modification; educate renters on how to make a complaint; fund fair housing testing
- d. Back Home in Indiana Alliance...a project of the Governor's Council for People with Disabilities
 - i. Accessible units not rented by people with disabilities, recommend tying rental subsidies to accessible units or make LIHTC accessible units affordable at 20% of AMI; 2) MFP and housing—DOA has not helped clients access IHCD Section 8 vouchers for moving to integrated settings, recommend continued IHCD leadership of Olmstead implementation; 3) Homeownership is out of reach, recommend re-establishing Section 8 homeownership program and re-establish up to \$10,000 in down payment assistance for low income residents with disabilities
- e. accessABILITY Center for Independent Living, Inc.
 - i. People living on SSI are at 18% of AMI, recommend making more units affordable at 20% of less than AMI; 2) accessible units are often leased to non-disabled tenants, recommend increase the number of accessible units by maintaining incentives for tax credit properties that go above and beyond the number of Section 504 units beyond the 5% minimum; increase funds available for rental property home modifications; require that accessible units be affordable at 20% of AMI
- f. Lisa Poole, project consultant, Back Home Indiana Alliance

- i. 1) Accessible units are not rented by people with disabilities, recommend rental subsidies be tied to units designed to meet housing needs of people using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI; 2) MFP and Housing—DOA has not helped constituents access rental subsidies, recommend hold fast to IHCD's leadership role in Olmstead implementation and use Con Plan, section 8, LIHTC and Continuum of Care related resources in addition to potential HUD Section 811 funds for increased rental subsidies and partnership with public housing authorities to promote integrated housing; 3) homeownership is out of reach, recommend re-establishing the Section 8 Homeownership program with the IHCD Single Family Housing Department and re-establish up to \$10,000 in down payment assistance for low income persons with disabilities; 4) good quality market rental housing is not affordable for persons with SSI incomes, recommend using Con Plan, section 8, LIHTC and Continuum of Care related resources in addition to potential HUD Section 811 funds for increased rental subsidies and partnerships with public housing authorities that promote integrated housing and ensure those with very low incomes receive a fair share of all integrated and affordable housing units
- g. Terry Moreland, Back Home in Indiana Alliance (Southwest Team)
 - i. Accessible units are not rented by people with disabilities, recommend rental subsidies be tied to units designed to meet housing needs of people using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI; 2) MFP and Housing—DOA has not helped constituents access rental subsidies, recommend hold fast to IHCD's leadership role in Olmstead implementation and use Con Plan, section 8, LIHTC and Continuum of Care related resources in addition to potential HUD Section 811 funds for increased rental subsidies and partnership with public housing authorities to promote integrated housing; 3) homeownership is out of reach, recommend re-establishing the Section 8 Homeownership program with the IHCD Single Family Housing Department and re-establish up to \$10,000 in down payment assistance for low income persons with disabilities; 4) good quality market rental housing is not affordable for persons with SSI incomes, recommend using Con Plan, section 8, LIHTC and Continuum of Care related resources in addition to potential HUD Section 811 funds for increased rental subsidies and partnerships with public housing authorities that promote integrated housing and ensure those with very low incomes receive a fair share of all integrated and affordable housing units
- h. Brian Rodgers, Back Home in Indiana Alliance (Richmond team)
 - i. 1) the Independent Living Center of Eastern Indiana has a long waitlist, including 20 waiting for ramps, for accessibility modifications because it is the only organization in their 7-county region with a program; many of these consumers are in rental properties; 2) Accessible units are not rented by people with disabilities, recommend rental subsidies be tied to units designed to meet housing needs of people using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI; 3) MFP and Housing—DOA has not helped constituents access rental subsidies, recommend hold fast to IHCD's leadership role in Olmstead implementation and use Con Plan, section 8, LIHTC and Continuum of Care related resources in addition to potential HUD Section 811

funds for increased rental subsidies and partnership with public housing authorities to promote integrated housing; 4) homeownership is out of reach, recommend re-establishing the Section 8 Homeownership program with the IHCD Single Family Housing Department and re-establish up to \$10,000 in down payment assistance for low income persons with disabilities

- i. Ann Barnhart, Back Home in Indiana Alliance (Richmond team) and resident with disability
 - i. the Independent Living Center of Eastern Indiana has a long waitlist, including 20 waiting for ramps, for accessibility modifications because it is the only organization in their 7-county region with a program; many of these consumers are in rental properties; 2) Accessible units are not rented by people with disabilities, recommend rental subsidies be tied to units designed to meet housing needs of people using wheelchairs or the LIHTC accessible units need to be affordable at 20% or below AMI; 3) MFP and Housing—DOA has not helped constituents access rental subsidies, recommend hold fast to IHCD's leadership role in Olmstead implementation and use Con Plan, section 8, LIHTC and Continuum of Care related resources in addition to potential HUD Section 811 funds for increased rental subsidies and partnership with public housing authorities to promote integrated housing; 4) homeownership is out of reach, recommend re-establishing the Section 8 Homeownership program with the IHCD Single Family Housing Department and re-establish up to \$10,000 in down payment assistance for low income persons with disabilities
- j. Indiana Statewide Independent Living Council
 - i. 1) the highest rate of fair housing discrimination is against people with disabilities, recommend requiring IHCD funded developers, landlords, property managers and staff attend fair housing training, especially related to reasonable accommodation and modification; 2) continue to be receptive and consider adjusting the approach to tackling housing barriers for vulnerable populations, which includes people with disabilities, as permanent supportive housing projects (Housing First model) strongly mirror congregate, institutional settings, recommend shifting direction of this model to scattered-site housing and create even greater incentives for developers to integrate supportive housing into new and existing communities; 3) recommend taking advantage of new leadership at DOA to collaborate and apply for Section 811 funds when the next NOFA is released to provide additional affordable housing opportunities for individuals transitioning out of institutional settings
- k. Allison Bracken, resident with a disability
 - i. Very excited about new visitability requirements and new Ramp Up program; 2) accessible units are not being rented by people with disabilities, recommend tying rental subsidies to accessible units or require LIHTC accessible units to be affordable at 20% of AMI; 3) MFP and Housing—DOA has not helped constituents access rental subsidies, recommend hold fast to IHCD's leadership role in Olmstead implementation and use Con Plan, section 8, LIHTC and Continuum of Care related resources in addition to potential HUD Section 811 funds for increased rental subsidies and partnership with public housing authorities to promote integrated housing; 3) homeownership is out of reach, recommend re-establishing the Section 8 Homeownership program with the

IHCDA Single Family Housing Department and re-establish up to \$10,000 in down payment assistance for low income persons with disabilities

- l. 16) Southern Indiana Center for Independent Living (Monroe County)
 - i. 1) no organizations provide funding for ramps in Monroe County; people living on SSI or SSDI cannot afford to build a ramp; 2) need for more affordable rental housing in Monroe County, with rent being based on income—there is plenty of housing for seniors, but not others; 3) need for transitional housing, with month-to-month rent, especially for homeless individuals with disabilities; a person with a disability needs to be able to stay in their own apartment while waiting for an approved unit to become available, a year lease is too large a burden for someone on SSI; 4) Bloomington’s Housing Authority has an extensive wait list; recommend making a commitment to include a fair share of housing funding for persons with disabilities
- m. Southern Indiana Center for Independent Living (Lawrence County)
 - i. 1) lack of accessible housing for low income residents with disabilities; some residents who become disabled are no longer able to live in their home due to accessibility issues; recommend moving forward in efforts to increase resident independence through programs like Ramp Up
- n. Southern Indiana Center for Independent Living (southern Indiana)—
 - i. 1) thank you for introduction of Ramp Up program; 2) recommend using funding to allow people on SSI the opportunity to afford housing and for people with homes to use funds for minor home repairs; 3) recommend re-instating the Home Fund to assist with down payments for first time home buyers and expand on the use of Section 8 vouchers; it is challenging for people with Section 8 vouchers to fund units that will take the voucher and that are affordable and accessible; 4) recommend affirmatively furthering fair housing through universal design standards for all new construction
- o. Jewel Lofton, resident
 - i. 1) recommend continued investment in affordable housing programs, such as those that contributed to development of the Barton Tower, the Barton Annex and the Oxmoor Meridian Apartments; 2) recommend expanding funding for Shelter Plus Care program so that it can be implemented statewide in the non-entitlement communities
- p. Southern Indiana Center for Independent Living (Washington County) and resident with a disability
 - i. 1) recommend down payment assistance for low income residents with disabilities—a mortgage is less expensive than renting (\$350 vs. \$600), but low income residents with disabilities are unable to save enough to purchase; a home can be safe and accessible, but often people with disabilities must be tenants, living in places that are “affordable” but unsafe or not accessible; 2) recommend more funds for home repairs and for rental home repairs—as a renter, the resident accidentally punctured a tub in a rental unit with his handicap chair; because it was his fault, he needed to pay for the repair; as a renter, no minor home repair programs would pay for the repair, so he had to bathe in a sink until a private individual paid for the repair
- q. Southern Indiana Center for Independent Living (Crawford County)
 - i. 1) disabled and those living on disability need rental assistance, down payment assistance and rental subsidies/Section 8—there are apartments that could be

rented but are financially out-of-reach; 2) No emergency or homeless shelter in the county; 3) need for additional livable and visitable housing units/homes; 4) need for more economic development/economic opportunity in the county; 5) funds for ramps needed

- r. Sarah Coleman, advocate for individuals who are blind or have visual impairments
 - i. 1) accessible units are not rented by people with disabilities—recommend tying rental subsidies to the accessible units or that LIHTC accessible units be affordable at 20% or below AMI; 2) sustain and expand IHCD's national leadership role in the implementation of Olmstead—affirm commitment through section 8 voucher program; pursue integrated housing models that do not result in clumping people with low income, disabilities or aging seniors; 3) increase the availability of integrated and accessible rental housing that is affordable to people with disabilities and SSI incomes (18% of AMI)—LIHTC units are not affordable, even at 30% AMI; use other rental subsidy strategies to promote integrated housing for people with disabilities
- s. Wabash Independent Living and Learning Center
 - i. Issues: 1) finding accessible and affordable units is a major issue for people with disabilities; accessible units are often rented to individuals who do not use wheelchairs; these units need to be available to persons using wheelchairs and affordable to residents who are at or below 20% AMI; 2) most residents with disabilities are not able to purchase a home, often because they lack a down payment; recommend re-establishing down payment assistance for persons with disabilities and low income; 3) an insufficient number of accessible housing units continues to be an issue, recommend increasing the required number of accessible units in new construction, particularly single family, duplex and triplexes; this would benefit both residents with disabilities as well as accommodate families as their needs change over time; 4) Ramp Up will have a major impact for persons with disabilities as well as the elderly; for many, this means the difference between living at home or in a nursing home.
- t. **IHCDA Response: IHCDA recently launched Ramp Up – a grant program solely intended for the installation of ramps for qualified homeowners to improve the accessibility of their homes and allow the household members to age in place.**

HOME Public Comments:

1. Page 1: Application Due Date

- a. HAND
- b. With the HOME subsidy per unit limitations as proposed in the draft policy, the majority of HOME rental projects will also need to layer in AHP funds to be financially feasible. The FHLBI board meets August 3rd to consider AHP awards, which will likely be announced on August 5th, the same date proposed as the HOME application due date. Since a HOME application will no longer be valid if a project does not receive an AHP award, please delay the HOME application due date by 60 days to relieve your housing partners from having to fully prepare a HOME application that they may or may not wind up being eligible to submit. If a full 60 days is not feasible, even a 30-45 day postponement is helpful.
- c. **IHCDA Response: To allow for applicants to determine if they have been awarded AHP funding through the Federal Home Loan Bank prior to applying for HOME funding through IHCDA, the application deadline has been moved back to August 17th, 2016.**

2. Page 2: Application Fee:

- a. HAND and Milestone Ventures
- b. The costs for application are already substantial, and the 2016 application added additional requirements that will increase the cost for an application by a few thousand dollars. It is a challenge for CHDO's to make application, and this fee exacerbates the problem. Please consider removing this fee.
- c. Please reconsider requiring a \$500 application fee. It runs counter to the goal of encouraging non-profits to develop affordable housing as a means of alleviating the government burden of doing so. Given the moderate number of HOME applications IHCDA has received over the past few years, an application fee further discourages affordable housing development.
- d. **IHCDA Response: The fee for HOME applications has been reduced to \$250 per application. If the applicant applies, and is certified a Community Housing Development Organization (CHDO) this check will be refunded.**

3. Page 3: Rental Vs. Homebuyer

- a. Milestone Ventures
- b. Please expand the new language about separate consideration of rental and homebuyer projects to address what action IHCDA will take should funds remain in either allocation after applications are reviewed. Given the extent of unmet affordable housing needs in Indiana, it would be preferable to re-assign funding to the alternate housing activity rather than hold over unawarded funds to a future funding cycle.
- c. **IHCDA Response: Language has been included to re-assign funding if funds remain in either the homebuyer or rental allocations after a given funding round, and dependent upon demand for that funding.**

4. Page 10: Inspections

- a. HAND and Milestone Ventures
- b. The requirement concerning inspection is unclear (2nd Bullet). Both inspections, as written, refer to being performed at the completion of construction. Please clarify.
- c. Please clarify the timing of the two physical inspections. The current language states the first inspection will be upon completion of the documented scope of work, and the other upon completion of construction. These seem to be the same time frame. The completion of the documented scope of work typically is the same as the completion of the construction for the award.
- d. **IHCDA Response: The Physical Inspections policy has been updated to clarify the timing of inspections. All IHCDA-assisted units must be inspected twice during the award period. The first inspection will occur when 50% of the funds drawn for single site projects, or when half the units are complete for scattered site projects. The second inspection will be conducted upon completion of the construction for the award. Site visits during construction may be conducted to monitor progress of all projects. The IHCDA Inspector will conduct the physical inspections.**

5. Page 12: 25% Expenditure

- a. Milestone Ventures
- b. Please exclude RHTC/HOME combo awards from the new 25% expenditure policy. If a non-profit project receives a HOME loan in February in conjunction with RHTC's, it takes several months of due diligence and pre-construction activity before loan closing and beginning of draw downs. That same non-profit should not be excluded from participating in your HOME rental round. Further restricting entities eligible to apply for HOME funds runs counter to the goal of increasing participation in and quality competition for HOME funding.
- c. **IHCDA Response: HOME funds awarded and committed within the past six months are excluded from the 25% expenditure policy.**

6. Page 12: Uniform Administrative Requirement

- a. Milestone Ventures
- b. We have discussed the issues of competitive procurement and Uniform Administrative Requirements at length with HUD staff and understand that the Final Rule change in citation at 24 CFR 92.505, which now references 2 CFR 200 for Uniform Administrative Requirements, is not applicable to either non-profit or for-profit housing developers that receive a grant or loan of HOME funds for a development activity. Instead, it refers to defined entities within the HOME regulations of PJs, State recipients (which are Local Unit of Government grantees) and subrecipients (which are administrative entities or those running programs such as OOR or DPA). Please eliminate competitive procurement requirements since they are not required by HOME regulations. If you elect not to make that change, at least do not further burden housing developers by requiring compliance with 2 CFR 200. Or if you choose to impose 2 CFR 200 as a State policy requirement, please add explanatory language consistent with the rest of the bullet points in "3.3 HOME Program Requirements" so that applicants are made fully aware of what topic the regulatory citation refers to and clarify that this is a State policy choice and not a Federal requirement.

7. Page 16: Subsidy Limitations

- a. HAND and Milestone Ventures
- b. It is exceptionally difficult to layer adequate financing when construction standards and development risks continually increase. Please consider increasing the per unit subsidies by 10% or more.
- c. It costs much more than the proposed limits to gut/rehab or newly construct affordable apartments. By keeping these limits quite low, housing developers have no choice but to layer in a significant amount of other resources, often AHP, debt, and small local grants, which greatly increases the lead time and amount of effort invested in securing total project funding as well as complexity of long-term compliance reporting. This places an unnecessary burden on non-profit affordable housing developers. It is our understanding from HUD staff that the 240% high cost multiplier continues to be in effect in 2016 for all of Indiana, resulting in allowable subsidy limits much higher than what is proposed. To increase IHCD's impact on small community revitalization projects, simplify funding, and streamline compliance, please increase per unit limits and also increase the maximum award amount to \$900,000. These changes will be of great benefit, especially to Permanent Supportive Housing developments for which we understand IHCD is beginning to shift funding emphasis from RHTCs to the HOME program. By nature of the clients being served, these are often 0 or 1 bedroom units. At the low end of the current per unit subsidy spectrum, it would be quite difficult to develop small PSH projects with HOME and AHP.
- d. **IHCD Response: The subsidy limitations per unit have been increased by 10% from the 2015 to the 2016 application policy. They are as follows:**

Bedroom Size	Per Unit Subsidy Limit
0	\$60,000
1	\$68,000
2	\$83,000
3	\$106,000
4+	\$116,000

8. Page 16: 20% Soft Costs Limit

- a. Milestone Ventures
- b. The IHCD limit of 20% of HOME funds budgeted towards soft costs including developer's fee and 15% limit on developer's fee by itself has been in place for many years. From a total development cost perspective, however, the sum of these expenses can actually exceed 35%-40%. It is very difficult to develop projects within the 20% limit without layering in AHP funds. Please consider either increasing the 20% limit to 35% or excluding developer fee from the 20% limit.
- c. **IHCD Response: The 20% cap on program delivery (including the maximum 15% developer's fee) remains unchanged, so at least 80% of HOME funds awarded toward**

the development of a project are spent on the actual construction of the units. Up to \$50,000 is available in CHDO Operating Support for eligible CHDOs within a given year. IHCDCA has also amended the CHDO Operating Support to allow CHDOs to receive up to an additional \$25,000 within the second year of a contract if they meet the following criteria:

- Have begun construction within the first 12 months of the executed agreement with IHCDCA;
- Have drawn a minimum of 25% of the IHCDCA housing development award;
- Have drawn 100% of the original CHDO Operating Support award.

9. Page 20: Program Income

- a. Milestone Ventures
- b. Is the paragraph on this page intended to go along with the program income discussion? It doesn't seem to fit with the preceding paragraphs.
- c. **IHCDCA Response: Information on Program Income can now be found within Section 5.5.**

10. Page 22: Management Fee Inflation

- a. Milestone Ventures
- b. Management Fee Inflation – Since property management fees are calculated each year as a percentage of Effective Gross Income, they inflate at the same rate as income rather than the higher rate like the rest of a project's operating expenses. Please create a separate row on the proforma for management fees and allow for data entry in that row each year.
- c. **IHCDCA Response: The pro-forma has been changed to allow the management fee to escalate with income rather than expenses.**

11. Page 23: Debt Coverage Ratio

- a. Milestone Ventures
- b. Please continue to review DCR for a 15 year period, to remain consistent with the industry standard proforma timeframe for affordable housing funders and investors, rather than increasing to a 20 year proforma period to match up with the affordability period for newly constructed developments. Also, the minimum required ratio of 1.15 for projects without hard debt is very difficult to achieve. Please consider reducing it to 1.10.
- c. **IHCDCA Response: The DCR will be continued from a 15 year per period. The ratio of 1.15 remains unchanged.**

12. Page 25: Administrator Procurement

- a. Milestone Ventures
- b. As requested above, please eliminate competitive procurement requirement. Alternately, continue to review all procurement documentation at close-out monitoring instead of at application in order to streamline application submittal and maintain consistency between the types of documentation required at application versus project close-out.

- c. **IHCDA Response: Competitive procurement requirements are outlined in the CDBG & HOME Program Manual, not the application Policy. Staff is currently reviewing and updating that Manual.**

13. Page 25: File Naming

- a. Milestone Ventures
- b. The Threshold requirement to label each file folder as “Tab Letter: Folder Name” is inconsistent with allowable file naming nomenclature. Colons cannot be used within folder or file names.
- c. **IHCDA Response: All label requirements have been changed to include an _ (underscore) instead of a : (colon).**

14. Page 25: Site Control

- a. Milestone Ventures
- b. Please allow submittal of purchase options or agreements that are older than 6 months. Such agreements can continue to be valid well beyond IHCDA’s 6 month limitation. It can be challenging to comply with this for projects that are layering in AHP funding given the timespan between AHP and HOME application deadlines, and asking sellers to execute purchase options multiple times can make them become skittish or open an unintentional can of worms for them to push for renegotiation of the purchase price.
- c. **IHCDA Response: Site control documentation now requires evidence of a purchase option or agreement that expires no less than 30 days subsequent to the award announcement date.**

15. Page 26: Title Search and Zoning Approval

- a. HAND
- b. This is an important underwriting step, but it is also one that comes with costs. We have rezoned properties for applications and only about 50% of those get funded. Therefore, we spend a lot of time and costs obtaining local approvals that are unnecessary. Local plan commissions and city councils also look at this differently when the funding is in place. Allowing CHDO’s discretion about the best time to pursue zoning changes rewards those who do so, but does not further raise the bar. We request these items contribute towards points and not proceed as a threshold item.
- c. **IHCDA Response: With the strict underwriting and commitment guidelines required by HUD for all HOME projects, evidence of clear title is necessary so as the recipient of HOME funds can begin construction work (as required by HUD) within 12 months of the commitment of HOME funds.**

16. Page 26/27: Cost Estimates

- a. Milestone Ventures
- b. The requirement to submit cost estimates is listed twice on the threshold checklist.
- c. **IHCDA Response: One requirement to submit cost estimates has been deleted.**

17. Page 27: Visitability

- a. Milestone Ventures

- b. This section of the rental policy refers to homebuyer units and a prospective buyer. Is this a typo?
- c. **IHCDA Response: References to Visitability have been deleted from the homebuyer policy.**

18. Page 28: Senior Developments

- a. Milestone Ventures
- b. Please move the accessibility / adaptability language, which is much more prohibitive than the Federal Section 504 5% accessibility standard back to being a scoring incentive rather than threshold requirement. In particular, rehab of existing properties may not be able to comply with the 100% standard due to existing floor plan configurations.
- c. **IHCDA Response: The Accessible and Adaptable requirement remains in threshold, but only for Senior Developments.**

19. Page 32: Scoring Chart

- a. Milestone Ventures
- b. We add up maximum score to sum 112 points rather than 114 points. Differences are project characteristics 32 points, capacity 22 points, and financing 12 points.
- c. **IHCDA Response: Scoring has been updated to the following:**

Scoring Category	Points Possible
Project Characteristics	34
Development Features	33
Readiness	6
Capacity	27
Financing	10
Unique Features & Bonus	10
Total Possible Points	120

20. Page 32: Scoring Threshold

- a. Milestone Ventures
- b. Please reduce the 75 point scoring threshold to 65 points. This is quite challenging for applicants to achieve, especially with 19% of total available points dependent upon performance on an entity's single, most recent award. An otherwise productive housing developer could find themselves blocked from competing for HOME funding for a 5 year period following an anomaly of poor performance on a single project.
- c. **IHCDA Response: The 75 point threshold requirement remains. For new construction projects, applicants can score a total of 110 points; applicants applying for rehabilitation projects can score a total of 113 points. Based upon this, applicants would only need to score 69 or 66% respectively of the total possible points to meet this requirement.**

21. Page 32: Scoring

- a. Milestone Ventures

- b. Consider making all individual scoring items roughly equivalent so that there are no longer high point areas that overshadow everything else, such as opportunity index, services, and the past performance categories.
- c. **IHCDA Response: The scoring categories will continue to promote the required HOME rule underwriting criteria – such as developer capacity through increased scoring points, and will use the scoring criteria to outline, and support policy priorities.**

22. Page 35: Comprehensive Community Development

- a. HAND and Milestone Ventures
- b. There are many ways to demonstrate a comprehensive approach to community development, and small HOME projects of 5-12 units can be strategic, but not necessarily recognized in a single planning document. Furthermore, in Hamilton County, there are no “target areas” which call for the creation of affordable housing. It’s a macro community issue and would be counterproductive to isolate affordable housing to one area – downtown Arcadia has different planning capabilities and market demand than midtown Carmel. Please provide greater flexibility for demonstrating strategic impact in a comprehensive community development initiative. Allow for communities to get points for initiatives that promote affordable housing in relation to community and economic development plans.
- c. Comprehensive Community Development – The new limitation that only one plan may be submitted for consideration is problematic since communities often create a comprehensive plan as a base document and then a few years later do an update with supplemental info. In these instances, the LUG utilizes both plans as companion documents.
- d. **IHCDA Response: The Comprehensive Community Development Plan will remain as a scoring item. Applicants who do not meet the criteria can still meet the scoring threshold required.**

23. Page 36: Fresh Produce

- a. HAND and Milestone Ventures
- b. Quality, desirable housing is sometimes in locations with an abundance of food sources, but they lie just too far for it to be walkable. Please increase this to a 1 mile radius.
- c. Increase the location requirement to be within a 1 mile radius of the site, which is a more appropriate measurement for rural communities.
- d. **IHCDA Response: The radius to fresh produce remains at 0.5 miles. To receive the total number of points within the Opportunity Index, applicants must just meet five of the nine total categories.**

24. Page 36: Public Transportation

- a. Milestone Ventures
- b. The wording used for this section reflects urban public transit characteristics (public transit station/bus stop) but does not take into the manner in which transit occurs throughout the majority of Indiana. Rural counties typically rely on either rural transit systems or non-public taxi transit. Rural transit programs sometimes run set routes but are more often designed to offer on-site pick-up via an on-call scheduling system. Please allow public and private transit systems in rural areas to receive these points as they

both accomplish the means of providing a low-cost alternative to automobile ownership.

- c. **IHCDA Response: The proximity and access to public transportation for HOME beneficiaries remains in the scoring policy. To receive the total number of points within the Opportunity Index, applicants must just meet five of the nine total categories.**

25. Page 36: Median Household Income

- a. Milestone Ventures
- b. In place of county-level data, consider awarding points for median household income level of the project's Census Tract, as proposed in the chart below. The Federal Financial Institution Examination Council (FFIEC) Online Census Data System, which is used by FHLBI for AHP scoring, annually publishes median income data by census tract at <http://www.ffiec.gov/census/default.aspx>. Additionally, remove unemployment rate, school performance, and healthy outcomes data as HOME scoring criteria.

Tract Income Level	Points
Upper	2 points
Middle	1.5 points
Moderate	1 points
Low	0 points

- c. **IHCDA Response: Census tract income has been changed and will be based upon the Federal Financial Institutions Examination Councils' (FFIEC) determination.**

26. Page 37: Tenant Investment Plan Service Agreement (MOU):

- a. HAND
- b. When we can submit alternative MOU's to the legal department for approval? What's the process and how long will the review process take? Please clarify.
- c. **IHCDA response: For consistency across HOME recipients, applicants must use IHCDA's MOU.**

27. Page 40: Smoke-Free Housing

- a. HAND
- b. We are pleased to see this addition to the HOME Policy. We have instituted this policy on new developments, and are working to transition existing properties as well. One point of clarification may be as to whether or not E-cigarettes are included in this. Our interpretation is that this is a "smoke-free" policy, not a "tobacco/nicotine-free" policy. Please clarify.
- c. **IHCDA Response: The smoke free rental policy has been clarified to be only be "smoke free" and not tobacco/nicotine free policy.**

28. Page 41: Predevelopment Activities

- a. Milestone Ventures and HAND
- b. This section heavily favors rehab projects. New construction is likely to score only 2 of the 6 points for preliminary plans and survey. Lead testing, asbestos testing, and capital

needs assessment/structural needs reports are typically not applicable to new construction projects. Consider reducing this to a 5 point category and adding activities pertinent to new construction such as preliminary site plan approval, water available to site, and sanitary sewer available to site. Additionally, remove appraisal from the predevelopment list. Unless required by a conventional lender, an appraisal is not a requirement for affordable rental housing development. Appraisals are costly, and obtaining one for the sole purpose of scoring one predevelopment point would not be a good use of limited funding resources.

- c. Predevelopment Activities (p. 41): The requirements favor rehabilitation projects, and creates significant financial burden for the applicant. Appraisals, in particular, are expensive and provide very limited utility. Give credit for new construction projects that will not have Lead or Asbestos to deal with.
- d. **IHCDA Response: The total number of potential points for “Predevelopment Activities” has been decreased to three points, and preliminary plans added to the list of completed predevelopment activities permissible under the category.**

29. Page 41: Contractor Solicitation

- a. Milestone Ventures
- b. Remove the scoring incentive for contacting five contractors at the time of HOME application. Doing so several months in advance of having project funding in place, full design work completed, and going out to bid serves no practical purpose. It does not in any way measure “an applicant’s ability to begin and timely execute an awarded project,” and it tends to confuse potential contractors. IHCDA-funded projects almost always use Indiana contractors, and unless you begin to allow housing developers to non-competitively procure contractors, they are required to solicit MBE/WBE/DBE firms anyway.
- c. **IHCDA Response: The scoring incentive for contractor solicitation to Minority Business Enterprises, Women Business Enterprises, Federal Disadvantage Business Enterprises, Veteran Owned Small Businesses and/or Service Disable Veteran Owned Small Businesses will remain in the policy.**

30. Page 43/44: Applicant Award Performance:

- a. Milestone Ventures
- b. The extensive 17 point emphasis on an applicant’s past performance associated with a single award and the lookback timeframe of 5 years is overly punitive; it serves as a barrier to existing housing developers partnering with IHCDA to implement the HOME program; and it impedes the fundability of new housing developers. Further, if an applicant recognizes that they would benefit from the capacity of a proven, experienced consultant or grant administrator, they should be encouraged to do so and not be subjected to a 12 point scoring differential with 5 points that are only available if they have not been active in the HOME program for the past 5 years. Essentially, the standard set by this criteria is near-perfection, with the allowance for only one monitoring finding or concerns, no award extensions, and zero physical conditions issues. One blip in award performance can lock out an applicant from the HOME program for 5 years. Please (1) consider an applicant’s body of work rather than just their most recent award; (2) do not impose a scoring penalty on new HOME applicants or those that choose to use the services of a consultant or grant administrator; (3) only

allow poor performance to negatively impact scoring on one application cycle rather than 5 years; and (4) create measures to identify high risk recipients and provide just those entities with focused TA rather than the one-size-fits-all TA approach that has been implemented over the past few years.

- c. **IHCDA Response: The category of “overall IHCDA Award Performance” has been set at 10 points. New HOME applicants are eligible for five additional points if they have procured an administrator with previous IHCDA HOME experience. IHCDA will continue to offer a variety of Technical Assistance opportunities to potential HOME applicants and offer feedback on projects and applications.**

31. Page 44: Public Financial Participation

- a. HAND
- b. While government-sponsored, the Federal Home Loan Bank is owned by private banks. Should these funds be classified as “Non-Public Financial Participation” instead? Please consider.
- c. **IHCDA Response: Federal Home Loan Bank will be classified as Public Financial Participation.**

32. Page 44: Physical Inspections

- a. Milestone Ventures
- b. Clarify whether performance will be measured from the most recent initial inspection conducted at close-out or ongoing inspections throughout the affordability period. Also, if this scoring item is retained, change the language to award points as long as the entity does not have any uncorrected issues.

33. Page 46: Bonus Points

- a. Milestone Ventures
- b. Please revise the criteria for receipt of bonus points to be consistent with how IHCDA awards these points for RHTC applications, i.e., tied to completeness and threshold performance but not applicable to questions IHCDA staff may pose for clarification or insufficient scoring documentation. The penalty for not providing adequate documentation for scoring purposes should only be the loss of the points associated with the scoring item itself, not an additional 5 point penalty on top of that.
- c. **IHCDA Response: The language on bonus points has been revised to be consistent with RHTC applications.**

34. CHDO Certification

- a. HAND
- b. The revised certification process is understandable and workable. However, it is challenging to maintain the capacity as a CHDO when operating support is contingent upon a project award. HAND receives operating support every 3 years despite pursuing numerous developments, and an absolute ongoing commitment to the development of affordable housing with the HOME Program. Please consider pathways for funding CHDO’s with greater frequency, and ensure the policy allows for CHDOs developing HOME projects using LIHTC receive CHDO Operating Support.
- c. **IHCDA Response: To garner and support CHDO capacity, CHDOs can be eligible for a second year of CHDO Operating Support. CHDOs funded within the past 12-24 months**

can apply for additional supplemental operating support of up to \$25,000, if they have met the following criteria:

- i. Have begun construction within the first 12 months of the executed agreement with IHCDA;**
- ii. Have drawn a minimum of 25% of the IHCDA housing development award;**
- iii. Have drawn 100% of the original CHDO Operating Support award.**
- iv. CHDO Operating Support cannot exceed to greater of \$50,000 within one fiscal year.**