

SECTION III.

Public and Stakeholder Consultation

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Public consultation for the development of the State of Indiana 2015-2019 Five-year Consolidated Plan included regional meetings led by program liaisons, a resident survey, a stakeholder survey, a survey of public housing authorities (PHAs), interviews with stakeholders, and a public hearing during the 30-day public comment period. This chapter summarizes the results of this very comprehensive public input process.

Key Findings

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

- The population of single persons and families living in poverty has grown, increasing the need for deeply subsidized housing to serve them;
- Wide variation exists in how well rural communities recovered from the Great Recession. Some find themselves with a shortage of affordable, workforce housing due to growing employment. Areas that have not recovered from the recession are plagued by a market still hurt by foreclosures, with substandard housing stock, high unemployment and growing concerns about substance abuse.
- Economic development and public transportation are priority needs in many rural areas.
- Rural areas also need improvements to streets, sidewalks and residential housing to accommodate their needs and make rural communities more visitable. This need will grow as rural communities continue to age.
- Housing condition is a challenge across all rural communities.

Altogether, 1,003 Indiana residents and stakeholders participated in the Consolidated Plan process:

- 686 residents participated in a survey about their housing needs. This survey will also inform the state Analysis of Impediments to Fair Housing Choice (AI). The survey includes separate, statistically significant samples for persons with disabilities and racial and ethnic minorities.
- 233 stakeholders responded to an online survey about community needs.
- Approximately 40 stakeholders were contacted about their interest in conducting telephone interviews about housing and community development needs in their communities. Six stakeholders requested interviews; these were conducted in April 2015.

- Sixty-three public housing authorities (PHAs) were invited to participate in a survey about housing needs and challenges in the communities they serve. Twenty-eight PHAs responded to the survey.

How do the findings differ from past years’? In 2013 and 2014, a similar survey of stakeholders was conducted and regional meetings were also held to discuss housing and community development priorities. The top community development needs have remained relatively consistent during the past three years: Job training and public transit top the list, followed by water/sewer/wastewater infrastructure improvements. Housing needs have shifted away from a focus on specific populations to broader needs for all types of poverty-level households. Housing rehabilitation and accessibility improvements remain as concerns.

Input from Public Hearings

On April 23, 2015 two public hearings were held to receive comments on the Draft 2015-2019 Consolidated Plan. The hearings were held in five accessible locations throughout the state at 2:30 p.m. and at 5:30 p.m. Altogether, 23 people attended the hearings. This compares to 10 attendees in 2013 and 16 in 2014.

The hearings included a presentation that provided background information about the Consolidated Plan process and requirements, discussed program changes for 2015 and presented the proposed program allocation for the 2015 Program Year (PY2015). A copy of the presentation from the hearings is attached to this section. Written comments received during the 30-day comment period are also appended to this section.

The hearings were held in:

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

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

- One attendee was concerned about the length of the Plan. Since it is the first time the public has reviewed the new format now required by HUD, it would have been nice to have more time to review the Plan before the public hearing. This is particularly important for persons who need the Plan transferred into alternative formats *Note: The draft plan was released 10 days in advance of the hearing.*
- In future years, could the state publish a “Save the Date” notice in January about when the hearings will be held in April?

- One attendee was concerned that migrant farm workers were no longer included as a special population in the new Plan.
- The needs of migrant farmworkers were described as severe, with many living in housing in very substandard condition, some without running water and many without modern conveniences (e.g., working appliances).
- Some nonprofit partners asked IHCD to utilize CDBG funding to create housing opportunities for migrant farmworkers. *Note: This activity has been an eligible use of IHCD CDBG funds in the past, but is not an intended use of PY15 funds. IHCD remains supportive of migrant farmworker housing and will work with interested communities and partners to deploy funds leveraged by the State's Section 108 Loan Guarantee for this activity.*
- One attendee was concerned with the lack of vouchers set aside under Money Follows the Person programs to use for independent living. Another attendee asked that Section 8 homeownership be part of the programs offered by the state's public housing authorities.
- Two attendees discussed the lack of visitable and accessible housing in the state's nonentitlement communities and called for a state visitability ordinance. One attendee shared his story: He lives in Fort Wayne and, of the 30 friends he would like to visit in the city, he can only visit one due to the difficulty getting into their homes and around their neighborhoods.
- Chemical sensitivity issues can be a problem in housing that is near agricultural areas. Landlords are not always aware of the requirement to make reasonable accommodations.
- One attendee recommended a program that would help low income homeowners with well and septic tank replacements.

The public hearings and comments were recorded on video and can be accessed at: <https://youtu.be/5H3bevHrVlw>.

Findings from Interviews and Surveys

This section presents the findings from the surveys and interviews that were conducted for the Consolidated Plan. These findings were used in the development of five year goals, priorities and projects; were measured against the proposed PY2015 allocation plan; and will be considered in future allocation plans.

Industry/organization and demographics of respondents. Figure III-1 presents the types of industries and organizations represented by stakeholder respondents. The greatest proportions of respondents provide services to low income residents and persons with disabilities. Respondents represent the public, private and nonprofit sectors. This was a similar distribution of stakeholder respondents as in 2013 and 2014.

Figure III-1.
Type of Industry/Organization Represented by Stakeholder Respondents

Industry/Organization Type	Percent	Industry/Organization Type	Percent
Services for low income residents	27%	Regional planning	4%
Services for persons with disabilities	26%	Homeownership counseling or services	4%
Homeless services	22%	Land use planning	4%
Local government	21%	Other	12%
Government general	18%	Services for businesses	4%
Economic development	16%	Public housing authority	3%
Services for seniors	16%	Landlord/tenant services	3%
Affordable housing advocacy	13%	Lending	3%
Services for persons with drug or alcohol addictions	11%	Business owner/manager	2%
Affordable housing development	10%	Criminal justice	2%
Services for veterans	8%	Services for farmworkers	2%
Food pantry	8%	Services for immigrants	1%
Affordable housing provision	7%	Services for refugees	1%
Education	7%	Transit provider	1%
Fair housing/Legal Aid	7%	Sales	0%
Own rental property	6%	Insurance	0%
Property management	6%	Market rate housing development	0%
Services for persons with HIV/AIDS	4%	Residential appraisals	0%

Note: n=225. Numbers add to greater than 100 percent due to multiple responses.

Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

Figure III-2 shows the counties represented by stakeholder responses.

Figure III-2.
Counties in Which Stakeholder Respondents Provide Services

County	Percent	County	Percent	County	Percent
Adams	4%	Hendricks	12%	Pike	4%
Allen	7%	Henry	5%	Porter	3%
Bartholomew	6%	Howard	5%	Posey	3%
Benton	3%	Huntington	6%	Pulaski	3%
Blackford	6%	Jackson	3%	Putnam	5%
Boone	11%	Jasper	2%	Randolph	5%
Brown	7%	Jay	4%	Ripley	5%
Carroll	3%	Jefferson	2%	Rush	4%
Cass	5%	Jennings	4%	St. Joseph	6%
Clark	1%	Johnson	10%	Scott	1%
Clay	3%	Knox	7%	Shelby	10%
Clinton	3%	Kosciusko	6%	Spencer	3%
Crawford	2%	La Porte	4%	Starke	2%
Daviess	6%	Lagrange	4%	Steuben	7%
Dearborn	5%	Lake	5%	Sullivan	5%
Decatur	4%	Lawrence	6%	Switzerland	3%
De Kalb	5%	Madison	5%	Tippecanoe	4%
Delaware	6%	Marion	13%	Tipton	5%
Dubois	3%	Marshall	4%	Union	3%
Elkhart	4%	Martin	5%	Vanderburgh	5%
Fayette	4%	Miami	4%	Vermillion	5%
Floyd	1%	Monroe	10%	Vigo	5%
Fountain	4%	Montgomery	12%	Wabash	7%
Franklin	5%	Morgan	10%	Warren	3%
Fulton	4%	Newton	1%	Warrick	2%
Gibson	4%	Noble	7%	Washington	3%
Grant	5%	Ohio	4%	Wayne	5%
Greene	8%	Orange	4%	Wells	3%
Hamilton	11%	Owen	6%	White	2%
Hancock	9%	Parke	4%	Whitley	7%
Harrison	1%	Perry	3%		

Note: n=195. Numbers add to greater than 100 percent due to multiple responses.

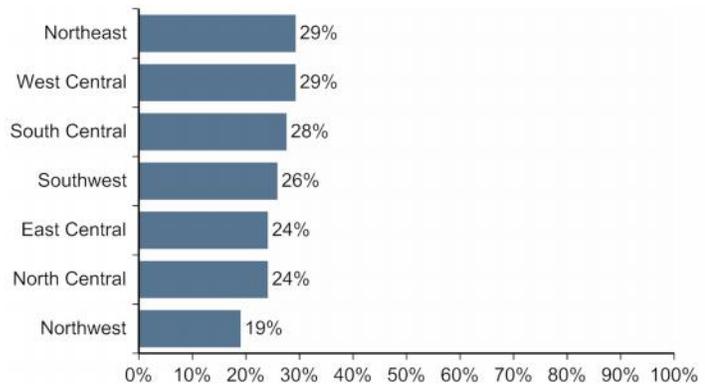
Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

As Figure III-3 shows, responses were well-distributed regionally.

Figure III-3.
Stakeholder Responses by Region

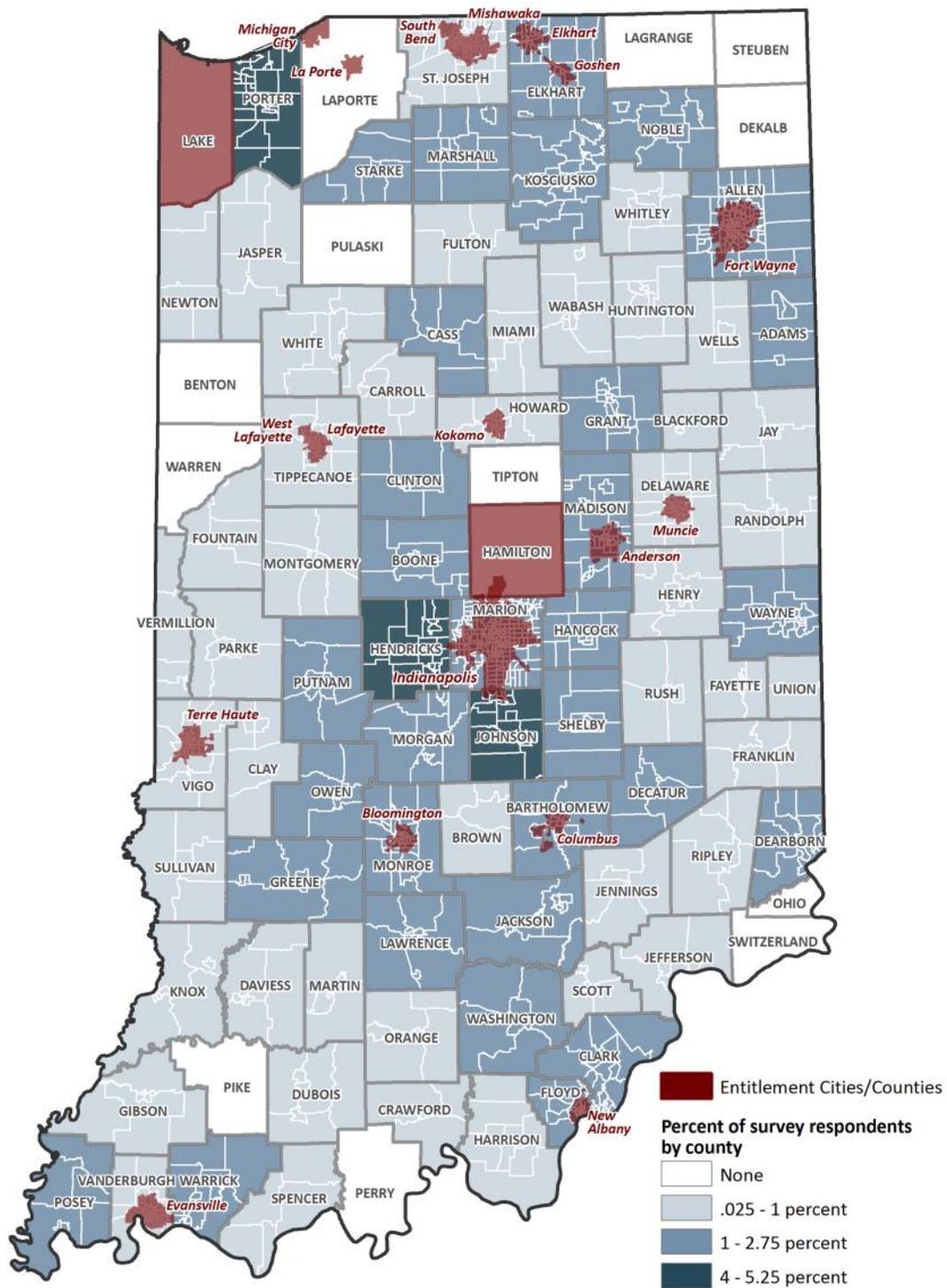
Note:
n=58.

Source:
BBC Research & Consulting from 2015-2019
Consolidated Plan Stakeholder Survey.



The residents responding to the survey lived throughout the state, as shown in the following map.

Figure III-4.
Residents Responding to Survey by County



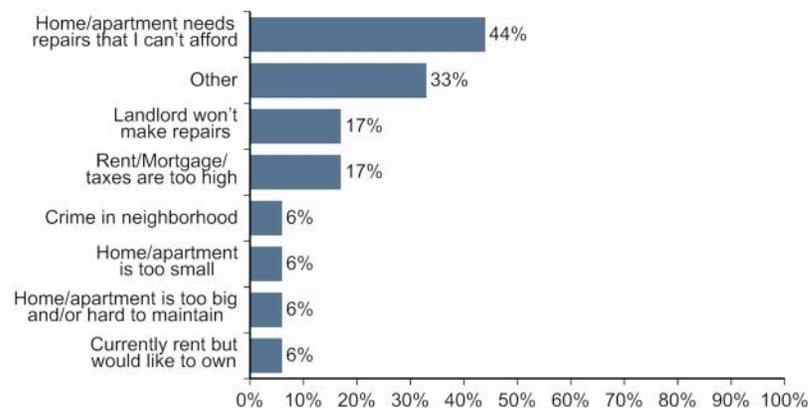
Source: BBC Research & Consulting from 2015 Resident Survey.

Seventy eight percent of households represented in the survey were owners; 14 percent were renters; and the remainder were living with others but not paying rent or mortgage. The majority of households lived in single family homes (88%), followed by apartments or condos (5%), mobile homes (4%) and townhomes/duplexes/triplexes/fourplexes (2%).

Housing and Homeless Needs

The majority of residents surveyed for the Plan said they were satisfied with their housing situation (90%). When asked about the most important factors in their choice of a home, residents listed cost, location and “liked the neighborhood.” Of those who were unsatisfied, the top reason for dissatisfaction was the need for repairs (see Figure III-5).

Figure III-5.
If you are dissatisfied with your home, why are you unsatisfied?



Note: n=18. Due to multiple responses, sum of values is greater than 100%.

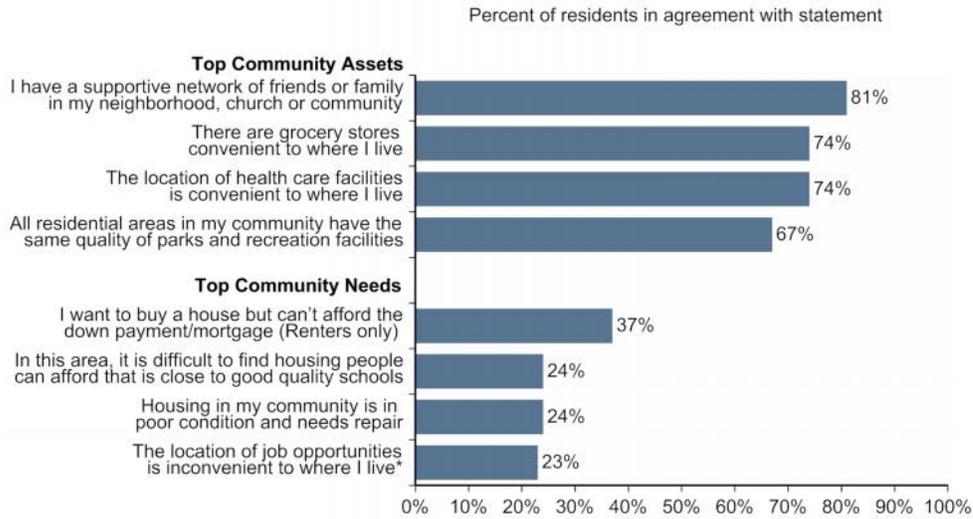
Source: BBC Research & Consulting from 2015 Resident Survey.

In order to evaluate community assets and stressors, residents were asked to rate their level of agreement with a series of statements about their community. Overall, residents exhibited higher levels of agreement with positive statements (assets) than with need statements (stressors)—again indicating a high level of satisfaction among residents. Figure III-6 displays the top assets and the top needs that were identified by residents in the survey.

The top housing needs included:

- Ownership opportunities for renters who would like to purchase a home
- Housing that is affordable and close to good quality schools;
- Condition of housing and need for repairs; and
- Proximity of jobs to housing.

Figure III-6.
Top Community Assets and Needs



Note: n=400.

*In the survey, this statement was presented in the positive (the location of job opportunities is convenient to where I live). It is presented here in the inverse form, along with the inverse percentage.

Source: BBC Research & Consulting from 2015 Resident Survey.

Stakeholders responded to a series of questions regarding housing and homeless needs in their community, including how needs may have changes in the past two to three years.

Recent changes in housing needs. Stakeholders shared their perceptions of how housing needs have changed in the past two to three years in the communities they serve. The changes stakeholders described were varied, with most described as affecting low income residents.

The most prominent themes were: 1) Greater need for affordable housing in good condition, 2) Loss of jobs, and 3) Increased need for affordable, workforce housing in areas with economic growth. Several respondents said that the supply of affordable housing had increased in their communities, especially for persons with disabilities.

In some cases, the housing needs described were conflicting, depending on economic conditions. The majority of respondents expressed a need for affordable housing, yet the needs differed: In areas with strong economies, housing needs take the form of increased housing prices that are reducing affordable, workforce housing opportunities. Areas that have not recovered from the recession describe a market still hurt by foreclosures with substandard housing stock and persistently high unemployment.

In many rural communities, public housing authorities (PHAs) provide the only programs to serve poverty-level households. PHAs were asked how easy it is for their clients to find vouchers: The majority, 72 percent, said it was easy (with 4% reporting “very easy”); 32 percent said it was difficult. No PHAs reported that finding a landlord to take vouchers was “very difficult.”

A growing demand for higher quality housing was a strong theme in the survey and interviews. Some said that seniors were most affected by housing condition.

- “Housing rehabilitation is the greatest need by far; there are a lot of old, run-down houses with many low income seniors living in this housing stock.”
- “It’s hard to attract senior living facilities in small communities, so most seniors age in their homes—but they are in need of rehabilitation.”

When asked about housing condition, PHAs did not identify required Housing Quality Standards (HQS) as a barrier to housing choice. Instead some recommended that HQS be a standard statewide to improve housing condition.

Populations most affected by housing changes. Stakeholders were asked which resident groups, if any, have been most affected by the changes in the housing market. The resident groups most consistently mentioned included:

- Persons with disabilities,
- Low income seniors,
- Low income families, and
- Low income residents in general.

PHAs reported that large families (75% reported challenges) and residents with criminal backgrounds (58%) are most challenged in using their housing choice vouchers, followed by residents with substance abuse histories (42%) and persons with disabilities (33%).

Greatest unmet housing needs. Figure III-7 presents the proportion of stakeholders who selected particular needs as one of three top unmet housing needs in their area. The greatest proportion of stakeholders (42%) selected housing for extremely low income residents (earning less than 30% AMI) as a top need. This is consistent with the 2014 stakeholder survey, but not the 2013 survey, where the needs of seniors were the highest ranked need.

**Figure III-7.
Greatest Unmet Housing Needs**

What are the top three greatest unmet housing needs in your service area?	Percent
Housing for persons at 30% Area Median Income or AMI or less (extremely low income, generally poverty level)	42%
Housing rehabilitation for low income homeowners (earning less than 80% AMI or about \$45,000/year)	26%
Housing for persons at 60% AMI or less (very low income, generally earning less than \$35,000/year)	24%
Housing for homeless families	22%
Housing for seniors	21%
Housing for persons with serious mental illness	20%
Housing for persons at 80% AMI or less (low income, generally earning less than \$45,000/year)	19%
Emergency shelter for homeless/homeless shelter	17%
Housing for persons with physical disabilities	17%
Housing for adults with criminal histories (felonies)	17%
Other	17%
Housing for chronic homeless	15%
Homeownership opportunities for low income residents (earning less than 80% AMI or about \$45,000/year)	14%
Housing for persons with cognitive disabilities	11%
Homeownership opportunities for moderate income residents (earning 80-120% AMI or generally between \$50,000 and \$75,000/year)	9%
Housing for homeless women	8%
Housing for homeless veterans	7%
Housing for homeless men	7%
Housing for youth transitioning out of foster care	7%
Housing rehabilitation for moderate income homeowners (earning 80-120% AMI or generally between \$50,000 and \$75,000/year)	7%
Housing rehabilitation for low income renters (earning less than 80% AMI or about \$45,000/year)	6%
Housing rehabilitation for moderate income renters (earning between 80-120% AMI or generally between \$50,000 and \$75,000/year)	3%
Housing for persons with HIV/AIDS	2%

Note: n=121. Numbers add to greater than 100 percent due to multiple responses.

Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

Figure III-8 compares responses to the top Greatest Unmet Housing needs in 2013, 2014 and 2015.

**Figure III-8.
Greatest Unmet Housing needs in 2013, 2014 and 2015 Stakeholder Surveys**

Top needs 2013	Top needs 2014	Top needs 2015
1 Housing for seniors	1 Housing for < 30% AMI residents (\$25,000 and less/year)	1 Housing for < 30% AMI residents (\$25,000 and less/year)
2 Housing rehabilitation for low income homeowners	2 Emergency shelter for homeless	2 Housing rehabilitation for low income homeowners
3 Homeownership opportunities for low income residents	3 Housing rehabilitation for low income homeowners	3 Housing for < 60% AMI residents (\$35,000 and less/year)
4 Emergency shelter for homeless	4 Housing for persons with serious mental illness	4 Housing for < 80% AMI residents (\$45,000 and less/year)
5 Housing rehabilitation for moderate income homeowners	5 Housing for persons with physical disabilities	5 Housing for seniors
6 Housing rehabilitation for low income renters	6 Housing for seniors	6 Housing for persons with serious mental illness
	7 Housing for homeless families	
	8 Housing for adults with criminal histories	

Note: More than one-fifth of stakeholders ranked these as the Greatest Unmet Housing Needs.

Source: BBC Research & Consulting from 2013, 2014 and 2015-2019 Consolidated Plan Stakeholder Survey.

Community Development Needs

In the survey, stakeholders responded to a series of questions regarding community development needs. Stakeholders also discussed community development concerns in their interviews.

Greatest unmet community development needs. Stakeholders identified the top three greatest unmet community development needs in their area. As shown in Figure III-9, public transit and job training programs were identified as the top needs for about 40 percent of stakeholders. These are followed by sidewalks and water and sewer infrastructure.

Figure III-9.
Greatest Unmet Community Development Needs

What are the top three greatest unmet community development needs in your service area?	Percent
Public transit for all	41%
Job training programs	39%
Sidewalks	26%
Water and sewer infrastructure	24%
Infrastructure for Internet access	19%
Accessibility (ADA) improvements to community amenities (e.g., parks, trails)	17%
Stormwater infrastructure	17%
Other (please specify)	16%
Accessibility (ADA) improvements to public buildings	15%
Public transportation for persons with disabilities	15%
Youth center	11%
Public safety support (e.g., fire stations, fire trucks)	10%
Technical assistance—Identifying loan/grant opportunities	10%
Technical assistance—Business plan development, entrepreneurship training	7%
Public transportation for seniors	6%
Street lighting	6%
Technical assistance—Energy efficiency and renewable energy services	6%
Senior center	4%
Flood plain mitigation	4%
Technical assistance—Business skills development (e.g., accounting, software training)	3%
Technical assistance—Market research and competitive intelligence	2%
Technical assistance—Internet and social media strategy/search engine optimization	1%
Technical assistance—Water conservation services	1%
Technical assistance—other (specify)	1%

Note: n=165.

Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

Figure III-10 compares responses to the top Greatest Unmet Community Development needs in 2013, 2014 and 2015.

Figure III-10.
Greatest Unmet Community Development Needs for 2013, 2014 and 2015 Stakeholder Surveys

Top needs 2013	Top needs 2014	Top needs 2015
1 Public transit for all	1 Job training programs	1 Public transit for all
2 Job training programs	2 Public transit for all	2 Job training programs
3 Water and sewer infrastructure	3 Sidewalks	3 Sidewalks
4 Sidewalks	4 Water and sewer infrastructure	3 Water and sewer infrastructure
5 Stormwater infrastructure	5 Youth centers	

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

Source: BBC Research & Consulting from 2013, 2014 and 2015-2019 Consolidated Plan Stakeholder Survey.

There is more consistency in stakeholder-identified community development needs than housing needs across 2013, 2014 and 2015. Unfortunately, the top two needs—public transit and job training programs—are some of the more difficult needs to address through CDBG due to the federal requirements governing the program.

Increasing Program Effectiveness

Stakeholders 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? What would you do differently?

Stakeholders interviewed offered several suggestions:

- “The state does a good job overall—but more de-regulation and reductions in red tape would lower the cost of building and/or repairing housing.”
- “A larger share of CDBG should be allocated to housing programs. Housing rehabilitation needs to be a top priority.”
- One stakeholder feels that “CDBG disaster recovery funds should be allowed to be used for rentals; some of the rental stock has been devastated by weather.”
- Safe and secure transitional housing is needed as an alternative to rapid re-housing (which has no security or regulations), particularly for victims of domestic violence.

Several stakeholders shared thoughts on the HOME application process:

- One stakeholder described a timing issue in HOME applications also seeking AHP funds through the Federal Home Loan Bank of Indianapolis. Due to changes in the HOME regulations in the federal HOME Final Rule, IHEDA began requiring applications to have all other sources of funding (except the HOME) already committed. The Federal Home Loan Bank does not announce awards until July, after the HOME applications are due. *Note: after learning about this conflict, IHEDA announced a modification in policy specific to AHP funds. This can be found in RED-15-21, <http://www.in.gov/myiheda/rednotices.htm>.*

- Some stakeholders expressed concern about the rental tax credit scoring emphasis on community impact and adaptive re-use making it difficult for other types of projects—that may do a better job of meeting community development needs—from receiving tax credits.
- HOME applications for projects that assist persons with disabilities require single room occupancy units to have a kitchen per unit, which raises costs and may not be necessary for the development type.
- “HOME needs to find ways for more frequent, rolling applications and/or a short application for certain projects. It is difficult for small nonprofits to buy land when it becomes available and hold onto to them until they receive funding.”
- Clarity on the process to access HOME funds is needed.

Figure III-11 summarizes stakeholder responses to the survey question about changes to housing programs.

Figure III-12 shows how stakeholders would expect these changes to impact outcomes.

**Figure III-11.
Recommended Changes to Housing Programs**

What would you do differently?
<p>General Affordable Housing Programs and Funding</p> <p>Provide more funding for housing programs and seek diversified funding sources Re-establish Section 8 homeownership program and expand homeowner rehabilitation program to include scattered sites Increase availability of Section 8 housing, affordable housing for low and middle income households, seniors at 30% AMI and affordable farmworker and homeownership housing opportunities Ensure program funds are used for home and rental repairs, create a revolving fund for local home repairs and/or require landlords to make needed repairs Provide assistance and tailor program design and funding application processes for small, rural communities, e.g., separate competition for funding from large communities Find creative ways to do bond financing with 4 percent tax credits Provide more authority to local HUD agencies, improve program administrative flexibility and oversight and prioritize program funds for local families Require drug testing and proof of employment/active search for employment to be eligible for housing programs</p>
<p>Homelessness/Mental Health and Substance Use</p> <p>Increase the amount of stable and subsidized housing opportunities for persons with mental illnesses and persons released from prison Update and enforce the state's regulations on operators of healthcare housing Extend the 30 to 40 day emergency shelter stay to 60 to 90 days to provide more time to access permanent housing and employment Provide more housing assistance funding in order to meet HUD's target 20 to 30 day maximum shelter stay Increase funding for homelessness prevention services, e.g., rent and utility arrears, repairs Create incentives for jurisdictions to set maximum rent limits in areas with significant homelessness Provide financial support to small, rural communities to establish homeless shelters Increase funding for permanent supportive housing and case management for chronically homeless adults and families Do not prioritize Housing First for all homeless persons; it is not always the best path to housing stability Provide more resources to house and support unaccompanied homeless youth and homeless Veterans</p>
<p>Accessible Housing</p> <p>Ensure programs have sufficient funding set aside for accessible modifications Require new development to be visitable and accessible at least on the first floor Connect with Centers for Independent Living for input and development of housing programs for low-income persons with disabilities Provide grants to property managers to renovate older homes into accessible homes for those with disabilities</p>
<p>Education/ Capacity Building</p> <p>Increase access to or require attendance at financial literacy and life skills education and training for tenants in subsidized housing Provide more education training to housing providers and consumers in order to improve knowledge of fair housing Provide technical assistance to struggling affordable housing property managers Provide financial resources to housing providers for bedbug prevention and treatment Strengthen internal efforts at affirmatively furthering fair housing Provide persons with disabilities a greater role in the decision making process and the opportunity to take on leadership roles Improve communication with the public with regards to waiting lists for housing programs</p>
<p>New Development/ Holistic Approach</p> <p>Take a holistic approach to solving housing affordability issues, e.g., access to housing, jobs, food and public transit Improve incentives for the development of low and middle income housing and mixed-income projects Require new residential development in urban areas to include mixed income and/or subsidized units Reduce segregation by building affordable housing in opportunity areas (areas with low unemployment and job growth) Streamline and expedite the application and approval process for affordable housing development Require a share of market affordable housing be provided in all communities based on median income</p>

Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

Figure III-12.
Anticipated Effects on Housing Program Changes

If your change is made, how do you think it will positively impact outcomes?
More efficient use and equitable distribution of state and federal resources would benefit very low to moderate income households
More funding for housing rehabilitation would increase the ability for seniors and persons with disabilities to remain in their homes and result in less reliance on nursing homes
Indiana would be a much more accessible and disability friendly state
Persons with disabilities would have more opportunities for housing and a greater role in decision making
Working closely with disability organizations would provide the state with valuable insight in order to become a more visitable, accessible and affordable state for individuals to age in place
More resources for affordable housing programs would house more people, the population would be more accepting of diversity and of low-income and disabled persons
Programs would be more effective and tailored to their needs of each community with more funds to provide additional services and hire program leads
More affordable and accessible housing with supports and better case management would allow individuals to live independently
Proactive support for persons with mental illnesses would reduce emergency visits and reliance on homeless shelters, lowering criminal justice and healthcare costs
Incentives would lead to the development of more affordable housing to better meet the need
Better treatment of farmworkers so they remain in the state
Program applications would be scored on logical basis
Communities would be able to focus on longer term housing solutions, prices would stabilize, neighborhoods would not deteriorate as rapidly, employment would rise, there would be fewer abandoned homes and more community pride
Housing providers would have better tenants, less turnover and reduced property maintenance costs
More housing assistance would decrease the reliance on the social programs and homeless shelters and people would have their needs met in small communities instead of having to go to Indianapolis
Nonprofit organizations would be better equipped to adapt to the changing realities in communities
Reduced utility costs and home repair grants would help prevent homelessness
If the provision of low to moderate income housing met the demand, communities could recruit laborers to fill jobs, vehicle miles traveled would be greatly reduced
Improved bedbug management would reduce costs for landlords and have a positive impact on whole communities
The continuation of the foreclosure prevention program would keep home owners in their homes and help to maintain neighborhoods
Transitional housing helps people find work and stability before finding permanent housing
More attention to healthcare and residential care would improve the standard of care and abuse would be eliminated
More emphasis on mixed-income housing would benefit low-income households
More housing choice would reduce the impacts of poverty, improve mental health and reduce crime
Higher property values would make communities more attractive to future residents
More support to very low-income seniors (30% AMI) would prevent homelessness and help ensure they can enjoy stable and secure housing
Requiring a drug test and evidence of employment search for admission into housing programs would hold people accountable for their actions and improve program outcomes

Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

Recommendations from stakeholders interviewed about community development needs included the following:

- Would like to see infrastructure programs geared toward workforce development and economic growth: 1) Assistance in developing sites for prospective businesses; 2) Infrastructure support for alternative housing types growing in demand for workforce (e.g., duplexes, lofts); 3) Marketing support to encourage entrepreneurship.
- Two rounds of funding are better than one. If an application gets tossed out for something silly/a technical mistake it can take more than a year to get funding in a one-round application cycle.
- Would be nice to get more assistance through Stellar Communities. It's a great program which "really makes you look at your community...and identify opportunities you may have considered before"

The open-ended contributions from survey respondents are shown in Figures III-13 and III-14.

Figure III-13.
Recommended Changes to Community Development Programs

What would you do differently?
Increase state support for local governments and non-profits, provide more funding and grant opportunities, e.g., capital grants, make grants easier to apply for and provide two grant opportunities per year (as per previous CFF program)
Ensure persons with disabilities are part of the decision making process and have opportunities to take on leadership roles
Community support must reach all communities, not simply Indianapolis and the surrounding area
Increase the share of funding dedicated to accessible modifications and provide in-home services to ensure persons with disabilities and senior can age in place and be engaged in the community, e.g., accessible public bathrooms
Ensure persons with a range of physical and mental illnesses can access programs and services, including homeless shelters
Provide more resources for local communities to improve infrastructure, e.g., sewage, roads, accessible sidewalks
Ensure public transit is affordable and accessible for persons with disabilities and expand service outside of business hours; more funding for public transit is needed
Provide more funding for new affordable housing for persons with disabilities
Improve state transparency and efficient and targeted use of public funds, realign the areas funds are dispersed to better represent needs and reduce burdensome rules and reporting requirements
Increase local government autonomy and authority, and require state decision-makers visit communities before making funding/policy decisions
Improved early childhood education and high school and college graduation rates, strengthen educational offering (e.g., shop class, business coops), provide job skills training and employment opportunities for youth and adults, especially in rural and low-income areas
Establish a long term statewide education strategy
Increase attention, technical assistance, funding and grant opportunities for small, rural communities, e.g., limited resources to be heard and apply for grants, challenges maintaining enrolment levels at rural schools
Reduce the burden on households of costly utility bills and high rents
Improve internet access in small, rural communities
Provide funds to accommodate for revenue lost by tax caps
Provide more funds for strategic planning, improve regional and state coordination and implement a regional development plan
Establish a partnership with IEDA and offer enhanced economic development training to state economic and community development agencies
Expand Stellar Communities program, provide support to communities that would like to join and provide a grant for infrastructure in the program
Improve access to and quality of data and communication with the public and to local governments about program and funding options, particularly in rural areas
Provide incentives for businesses to locate low-income, rural areas and support to attract development
Develop a transportation system that would link housing and service providers, e.g., transport housing tenants to the FSSA office, WorkOne office
Eliminate the income requirements restrictions for the communities; many low income people do not fill out income surveys and as a result some communities do not qualify for grants because they are above the income limit
Make the blight program easier to use for small communities
Raise property taxes in small rural areas; very low assessed values and property tax cap limits funding for basic infrastructure and the ability to provide a decent standard of living
Require banks work with communities to manage foreclosed, vacant properties
Utilize public schools in the summer for youth centers for those with and without disabilities and contract with local universities to offer credits for students majoring in education or social work to run these summer programs

Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

Figure III-14.
Anticipated Effects on Community Development Program Changes

If your change is made, how do you think it will positively impact outcomes?
There would be more funding and access to services, more affordable living options and people would have more hope and less stress
The disability community would be meaningfully involved in all decisions that affect them
Seniors would be better able to age in place and remain integrated in the community
The state would become friendlier and more accessible for persons with disabilities, making Indiana more attractive to new populations and desirable to investment
More public transportation would allow people to get to work without a car and participate in their communities and infrastructure improvements would create safer communities
Keeping young motivated people in small, rural areas would help with community development
A fair market for small business markets competing against big-box retail
There would be more attention to and investment in the quality of life in small and rural communities, not just in Indianapolis
More targeted training opportunities would increase local knowledge and capacity
Improved local capacity, knowledge, comprehensive planning and collaborative processes would improve community development and private investment
If students graduated with more skills and more families made a living wage there would be less reliance on community assistance programs and Section 8 housing
Small communities would be able to afford infrastructure maintenance, there would be improved energy efficiency and cost savings to households
Higher employment, better quality jobs and higher wages, new businesses and investment, leading to improved infrastructure and economic development
More efficient use of funds, more grant opportunities, better grant applications and final projects, targeted to the right low-income communities and better communication with communities about funding options
Elected officials and the general public would be more informed and would make better decisions
More businesses located in low-income areas
Lower crime, better family planning and a decrease in drug use
Improved educational outcomes from early childhood education to high school graduation
Better infrastructure and improved housing would attract jobs and people to stay or move to small towns
More services and programs to youth and children with disabilities would improve their outcomes and reduce reactive social costs
There would be less dependence on group homes and day programs

Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

Stakeholders were asked about the specific outcomes they would like to see in their clients through the question of: *In your opinion, if the state is successful in directing HUD block grant funds to address the housing and community development needs in your area or of your clients, what would you expect to see as outcomes in your town/city? List the top three outcomes you would prefer to see in your community or for your client.* Figure III-15 shows the responses to this question. More affordable rental housing, independent-living housing options and housing to address homelessness were the top expected outcomes.

**Figure III-15.
Successful Outcomes from Block Grant Program Investments**

Successful Outcomes from Block Grant Program Investment	Percent
More affordable rental housing	29.2%
accessible to persons with disabilities	21.4%
More seniors able to live independently/less seniors leaving their homes to live in nursing homes	20.8%
A job training center or enhanced job training programs	19.5%
More persons with disabilities able to live independently	19.5%
Permanent housing and programs to assist persons who are homeless	19.5%
Increased number of Section 8 vouchers or rental subsidies	18.8%
More opportunities to for business to start up/expand/locate here	18.8%
Improvements to water and sewer systems to reduce costs to residents	18.2%
Rehabilitation to housing for existing homeowners	16.2%
Main Street revitalized	14.9%
More jobs	14.9%
More housing that is accessible to persons with disabilities	13.6%
More opportunities for homeownership	12.3%
More shelters to assist persons who are homeless	11.7%
Energy efficiency improvements to existing housing to reduce utility costs	11.0%
Rehabilitation to rental housing	9.1%
Housing for specific types of residents	7.1%
Improvements to emergency services (fire stations, fire trucks, emergency equipment)	7.1%
Historic buildings and housing preserved and rehabilitated	6.5%
Additional and higher quality child care centers	5.8%
A community center or improvements to the community center	5.8%
More trainings and technical assistance to area nonprofits	5.8%
Other (please specify)	5.2%
A senior center or improvements to the senior center in our town/city	2.6%
More health care facilities	1.9%
A library or improvements to the library	0.0%

Note: n=154.

Source: BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey.

Housing for Persons with Disabilities

Seventy respondents (17.5%) to the resident survey said they have a household member with a disability of any type. Of those households, 21 percent said their housing *does not meet* their family's accessibility needs.

If applied to the number of housing units in nonentitlement areas, an estimated 300,000 units statewide (including entitlement areas) do not have the accessibility improvements residents need.

Figure III-16 shows the proportion of households needing accessibility improvements by unit type. The most common accessibility improvements needed were bathroom improvements (grab bars, roll-in shower, etc.) and ramps.

Figure III-16.
Does the house or apartment you currently live in meet your or your family's accessibility needs?

Source:
 BBC Research & Consulting from 2015 Resident Survey.

Type of Housing Unit	Percent that said, "no"
All Households with a member with a disability (n=189)	21%
Single family home/house (n=141)	24%
Townhome/duplex/triplex/fourplex (n=7)	14%
Apartment or condo unit in an apartment or condo building (n=20)	15%
Mobile home/manufactured home/mobile home park (n=14)	7%
Retirement community/independent living/assisted living (n=4)	0%

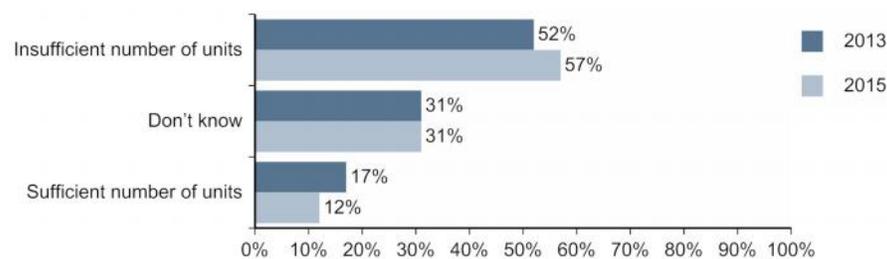
Stakeholders were asked how easy it is for persons with disabilities to get information about programs to help fund accessibility improvements. The vast majority—77 percent—felt that it was difficult or very difficult for persons with disabilities to easily access such information. This was a much higher percentage than in 2013 (64%).

In 2013 and 2015, stakeholders responded to a series of questions about the availability of and type of housing needed in their community for persons with physical or cognitive disabilities and severe mental illness. This section compares the questions that were asked in 2013 with those asked in 2015.

Housing for persons with physical disabilities. With respect to housing units accessible to persons with physical disabilities, stakeholders responded to questions about unit availability and quality as well as the types of units needed in their community.

Availability of accessible units. In 2013, less than one in five stakeholders reported a sufficient number of units for persons with physical disabilities are available in their community, as shown in Figure III-17. About half reported an insufficient amount. In 2015, the proportion reporting an insufficient amount had increased by 5 percentage points.

Figure III-17.
Availability of Housing for Persons with Physical Disabilities, 2013 and 2015



Note: n=207 in 2013; 106 in 2015.

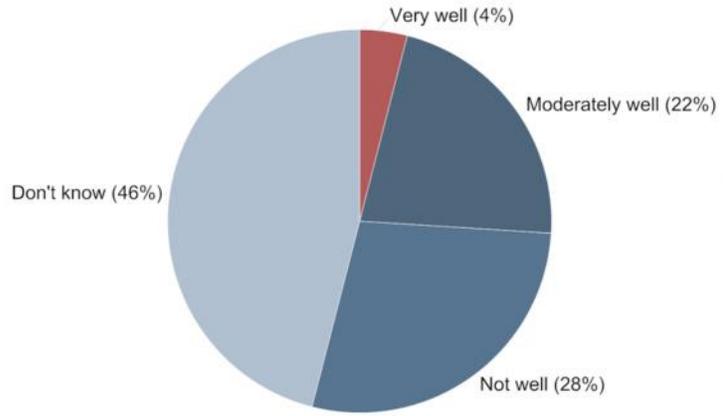
Source: BBC Research & Consulting from 2013 Action Plan and 2015-2019 Consolidated Plan Stakeholder Surveys.

Integrated settings. The 2015 survey asked how well state policies and practices encourage the placement of persons with disabilities in apartments, single family homes and other integrated community settings. Many stakeholders did not know; the rest were split in their opinions, as shown in Figure III-18.

Figure III-18.
How Well State Policies and Practices Encourage Integrated Settings for Persons with Disabilities

Note:
 n=108.

Source:
 BBC Research & Consulting from 2015-2019 Consolidated Plan Stakeholder Survey



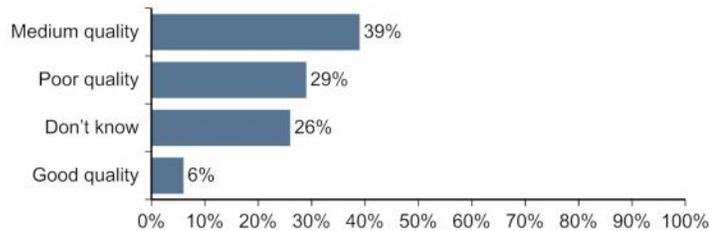
The reasons stakeholders gave for the policies and practices not working well included: Lack of housing units and policies within FSSA that limit opportunities for housing choice (specific policies were not described).

Quality of accessible units. With respect to the quality of units accessible to persons with physical disabilities, in 2013, only one in twenty stakeholders considered these units to be of good quality. About 30 percent rated accessible unit quality to be poor and one in four did not know how to rate the quality, as shown in Figure III-19.¹

Figure III-19.
Quality of Housing Accessible to Persons with Physical Disabilities, 2013

Note:
 n=207.

Source:
 BBC Research & Consulting from 2013 Action Plan Stakeholder Survey.



With respect to a lack of quality accessible units, stakeholders' comments included:

- Accessibility modification challenges are exacerbated in communities with old (pre-1960) housing stock;
- In some communities, accessible units are found in seniors-only buildings;

¹ This and the following questions were not repeated in 2015 due to the length of the survey. The 2015 survey incorporated more questions about fair housing barriers for the AI.

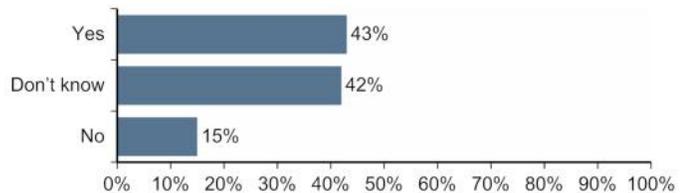
- Many units that are affordable to persons living on SSI are not accessible and are not located in safe areas or areas with amenities (e.g., grocery stores, good schools, good transit access); and
- Regardless of accessibility, affordable rental units are often in poor condition.

Type of housing needed. Those respondents who reported an insufficient number of units available in their community for persons with physical disabilities shared the types of housing units they believe are most needed. Stakeholders’ comments about the types of housing needed generally fell into the following categories:

- Accessible housing affordable to persons living on SSI;
- Accessible, affordable multi-bedroom units needed for persons with disabilities living with family;
- Accessible, affordable housing that is not senior housing;
- Waitlists for subsidized accessible housing are very long;
- Tenant based rental assistance is needed;
- While landlords are willing to make modifications, the tenant cannot afford the cost;
- Need for single family homes and townhomes that are accessible and visitable; and
- Accessible housing needs to be connected to or near public transit.

Challenges accessing housing. As shown in Figure III-20, in 2013, about two in five stakeholders believe that persons with physical disabilities encounter challenges accessing housing in their area. About the same proportion of stakeholders did not know if persons with physical disabilities have challenges accessing housing.

Figure III-20.
Challenges Accessing Housing for Persons with Physical Disabilities, 2013



Note:
n=198.

Source:
BBC Research & Consulting from 2013 Action Plan Stakeholder Survey.

With respect to the challenges persons with physical disabilities face when trying to access housing, stakeholders’ comments focused largely on the lack of accessible and affordable units in their community. In addition, stakeholders named the following challenges:

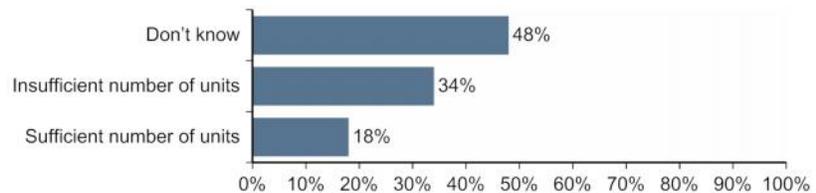
- A lack of public transportation limits where persons with disabilities can live;
- Sidewalks and curbs are not accessible to persons using wheelchairs;
- Many building entrances are not accessible, including some buildings built post-2000;

- Long waitlists for accessible and affordable housing, particularly for those with incomes less than 30 percent of AMI; and
- Few, if any, accessible units have more than one bedroom.

Housing for persons with cognitive disabilities. As with housing for persons with physical disabilities, stakeholders responded to a series of questions about the accessibility and quality of housing for persons with cognitive disabilities, the types of housing needed and challenges faced by this population in securing housing.

Availability of units. Compared to availability of units for persons with physical disabilities, about the same proportion of stakeholders (18%) believe there are a sufficient number of units available to persons with cognitive disabilities. A much greater proportion of respondents (48%) did not know if a sufficient number of units are available.

Figure III-21.
Availability of Units
Accessible to Persons
with Cognitive
Disabilities, 2013

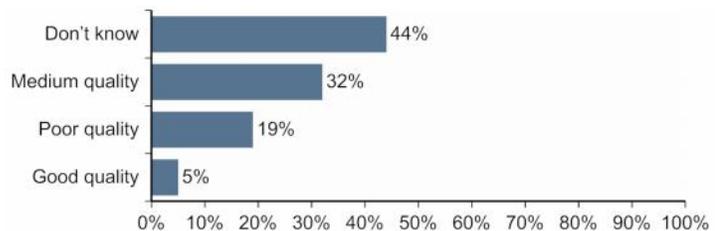


Note:
n=196.

Source:
BBC Research & Consulting from
2013 Action Plan Stakeholder
Survey.

Quality of available units. The greatest proportion of stakeholders (44%) did not know how to characterize the quality of housing units accessible to persons with cognitive disabilities. Of those rating the quality, only 5 percent rated the quality as good.

Figure III-22.
Quality of Housing Available
to Persons with Cognitive
Disabilities, 2013



Note:
n=194.

Source:
BBC Research & Consulting from 2013
Action Plan Stakeholder Survey.

With respect to the quality of housing available to persons with cognitive disabilities, the primary concern among stakeholders is that these individuals rely on SSI/SSDI and are very low income; therefore, the quality of the units they can afford to rent is often poor. Other comments about the quality of housing include:

- Group homes being located in undesirable areas with limited access to grocery stores, medical services or transportation;

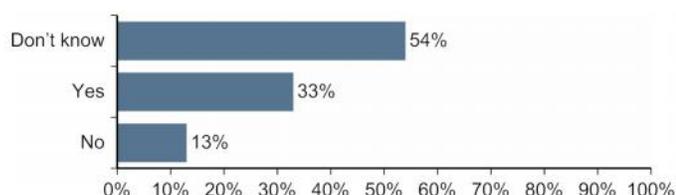
- Because alternative living arrangements are either not available or affordable, people with cognitive disabilities may be forced to live in group homes, nursing homes or other institutions when they would prefer another living arrangement; and
- A desire among stakeholders to see housing opportunities for persons with cognitive disabilities developed to be more integrated into the larger community.

Type of housing units/arrangements needed. Stakeholders suggested several types of housing units or living arrangements that are needed for housing persons with cognitive disabilities:

- Affordable and accessible units, particularly units affordable to individuals living on SSI/SSDI or on incomes below 30 percent of AMI;
- More group home living arrangements;
- Shared housing arrangements (not formal group homes) such as three individuals with cognitive disabilities and live-in supportive/supervisory staff;
- Living arrangements that are integrated into the community; and
- Living arrangements that promote independent living to the greatest extent possible, while also providing some degree of supportive services/supervision.

Challenges accessing housing. One in three stakeholders report that they believe persons with cognitive disabilities encounter challenges in accessing housing. The greatest proportion of stakeholders (54%) did not know if persons with cognitive disabilities have challenges accessing housing.

Figure III-23.
Challenges Accessing
Housing Encountered by
Persons with Cognitive
Disabilities, 2013



Note:
n=200.

Source:

BBC Research & Consulting from 2013
Action Plan Stakeholder Survey.

Those stakeholders who believe persons with cognitive disabilities encounter challenges described their perceptions of the challenges faced. These include:

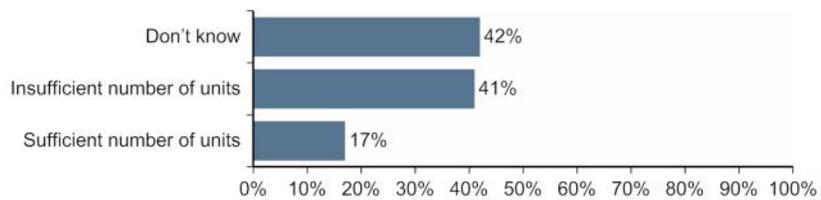
- Limited availability of affordable units to rent overall, regardless of quality—in many cases, the units persons with cognitive disabilities can afford to rent are substandard and located in undesirable neighborhoods;
- Discriminatory practices by landlords (e.g., refusal to rent);
- Zoning limits placement of group homes to only certain areas or restricts the number of unrelated persons able to live together;

- Insufficient opportunities for non-group home or non-institutional living arrangements; and
- Difficulties associated with having a sufficient number of housemates to secure caregiver or other supportive benefits.

Housing for persons with severe mental illness. Stakeholders gauged the availability and quality of housing accessible to persons with severe mental illness and the types of housing/living arrangements needed by this population.

Availability of units. As with persons with physical or cognitive disabilities, about the same proportion of stakeholders (17%) believe the availability of housing units accessible to persons with severe mental illness are sufficient.

Figure III-24.
Availability of Housing Accessible to Persons with Severe Mental Illness, 2013



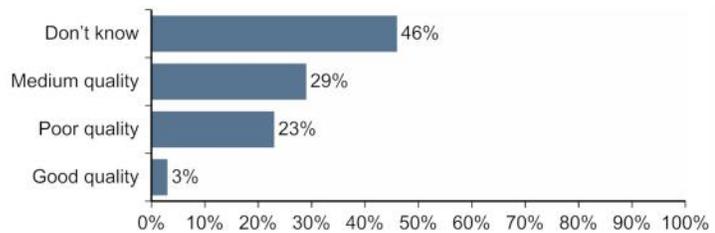
Note:
n=196.

Source:

BBC Research & Consulting from 2013
Action Plan Stakeholder Survey.

Quality of units. Stakeholders' perceptions of the quality of housing accessible to persons with severe mental illness generally fell into the "medium" and "poor" categories, but the greatest proportion of respondents (46%) did not know how to assess the quality.

Figure III-25.
Quality of Units Accessible to Persons with Severe Mental Illness, 2013



Note:
n=195.

Source:

BBC Research & Consulting from 2013
Action Plan Stakeholder Survey.

Since many persons with severe mental illness live on fixed disability income, stakeholders' perceive the types of units this population can afford to rent (without additional subsidy) tends to be older, in need of rehabilitation, and often located in higher crime areas and away from community mental health services. Stakeholders also discussed the need for housing for persons with severe mental illness with supportive services and the need for increased attention and funding for mental health services.

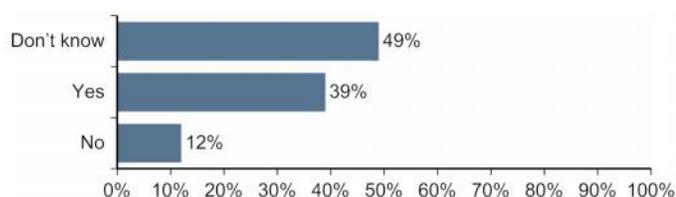
Type of housing units/arrangements needed. Stakeholders shared the types of housing needed most for persons with severe mental illness in their community. By far, the greatest number of

responses stressed the need for housing that is affordable to someone living on SSI/SSDI that is located in safe areas with access to social service and psychiatric supports. Other needs identified include:

- Group homes with supervision;
- Permanent supportive housing integrated into the community;
- Transitional housing; and
- Private landlords willing to rent to this population.

Challenges in accessing housing. As shown in Figure III-26, about half of stakeholders do not know if persons with severe mental illness have challenges accessing housing, and 39 percent believe they do have challenges.

Figure III-26.
Challenges Accessing Housing for Persons with Severe Mental Illness, 2013



Note:
n=196.

Source:

BBC Research & Consulting from 2013
Action Plan Stakeholder Survey.

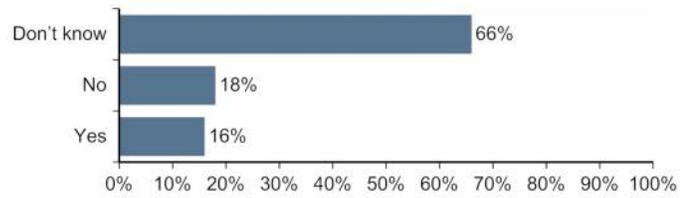
From the perspective of stakeholders, persons with severe mental illness face numerous challenges in accessing safe, quality housing they can afford. These include:

- Lack of safe, quality units affordable to those on SSI/SSDI or at 30 percent or below AMI;
- NIMBYism and zoning restrictions on group homes;
- Discrimination or unwillingness to lease by private landlords;
- Lack of sufficient community mental health services;
- Lack of housing with supportive services;
- Poor credit or rental histories; and
- Lack of affordable housing near transit and services.

Challenges in accessing housing for persons with HIV/AIDS. As shown in Figure III-27, the majority of stakeholders (66%) do not know if persons with HIV/AIDS encounter challenges accessing housing.

**Figure III-27.
Challenges Accessing
Housing for Persons with
HIV/AIDS, 2013**

Note:
n=199.



Source:

BBC Research & Consulting from 2013
Action Plan Stakeholder Survey.

Among stakeholders who believe persons with HIV/AIDS face challenges securing housing, two themes emerged:

- A lack of units affordable to persons living on 30 percent or less of AMI; and
- Discrimination in the private rental market due to the stigma of HIV/AIDS.



Presented by:

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STATE OF INDIANA

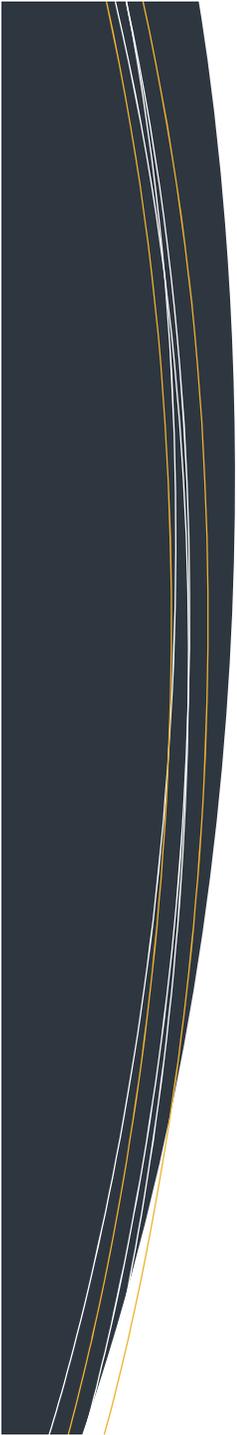
2015-2019 Consolidated Plan and 2015 Action Plan

Public Hearings — April 23, 2015

Agenda

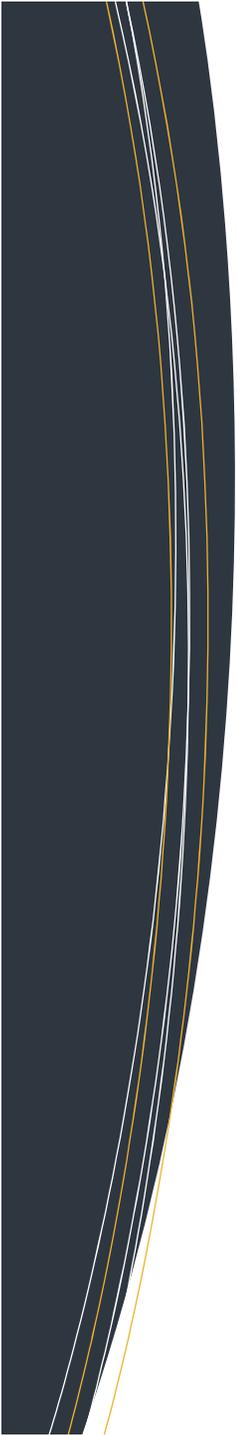
- **Introductions**
- **Background on the Consolidated Plan**
- **What's New in 2015**
- **Public comments and input**





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 the first Consolidated Plan using HUD's new online Consolidated Planning Suite (eCon Plan)

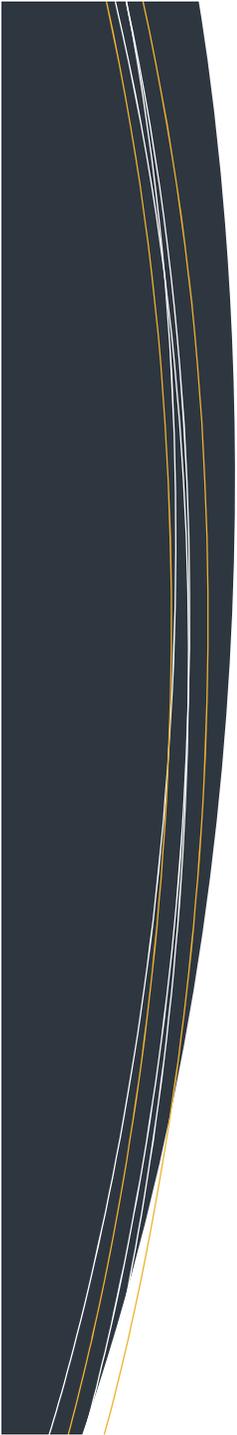
The State of Indiana's Consolidated Plan

■ Five-Year Strategic Plan and Annual Action Plans

➤ Pertains to specific HUD funding programs:

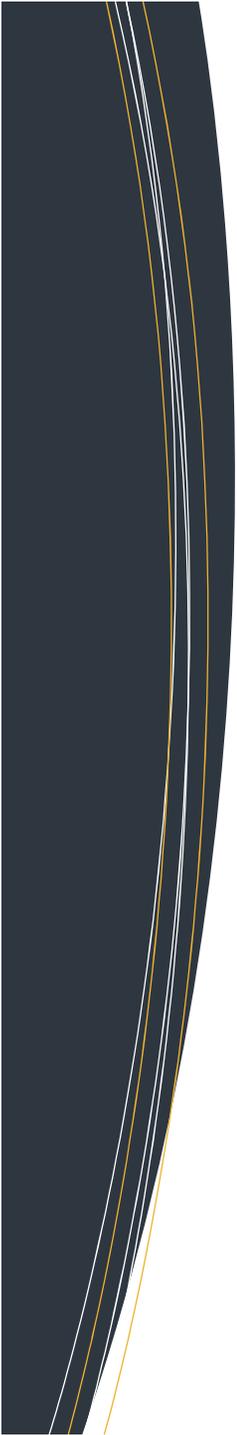
- *Community Development Block Grant (CDBG)*
- *Home Investment Partnerships Program (HOME)*
- *Emergency Solutions Grant Program (ESG)*
- *Housing Opportunities for Persons with AIDS (HOPWA)*
- *Also reports allocation of CDBG disaster recovery funds received by the State*

■ A new Analysis of Impediments to Fair Housing Choice (AI) is in research phase now and will be completed in late summer/early fall.



Summary of Consolidated Plan

- **Organized into five primary categories**
 - *ES and PR—executive summary, consultation and input*
 - *NA-needs assessment*
 - *MA-market analysis*
 - *SP-five-year strategic plan*
 - *AP-one year action plan*



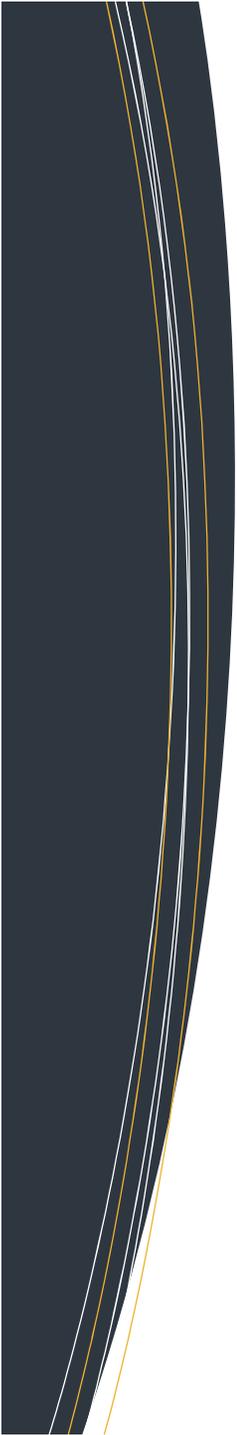
Summary of Consolidated Plan

■ Primary findings:

- Population growth remains stagnant, 6% increase 2000 to 2011
- Median income rose 16%, not enough to keep up with inflation
- Single family home prices rose modestly between 2000 and 2011. 2011-2013 price stagnation. Aging owners need help with maintenance and improvements.
- Family poverty rate doubled: 5.3% in 1999 to 11.2% in 2013. This has increased the need for deeply affordable rental units.
- Top needs according to stakeholder survey: *housing for persons earning < 30% AMI, housing for low income households in general, housing to help persons who are homeless and housing for seniors, public transportation options, job training and water and wastewater infrastructure improvements.*

What will the State receive from HUD? *(2015 estimated funding allocations)*

CDBG	\$27,777,000
HOME	\$9,369,000
ESG	\$3,635,000
HOPWA	\$953,000
TOTAL	\$41,734,000



What's New (and the Same) in 2015

- **The first five-year Consolidated plan prepared using HUD's required online eCon Plan suite. This format will be used for Action Plans and CAPERs in the future.**

- **Program modifications:**

CDBG: new workforce development program, increase in Section 108 to \$80 million, slight shifts in funding for public improvements and community revitalization

HOME: slight increase in RHTC/HOME combos, small reduction in rental competitive round, TBRA funded with past program year carry overs. Continued focus on expanding housing opportunities for low income households, persons with disabilities, seniors

ESG: slight increase of funding from 2014 and most allocated to rapid rehousing and operations of shelter

HOPWA: similar allocation of funds as in 2014, with most allocated to TBRA, STRUM and housing information services

Annual Goals and Objectives

CDBG funds:

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

\$7 million for wastewater/drinking water improvements

\$5 million for public facilities improvements

\$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

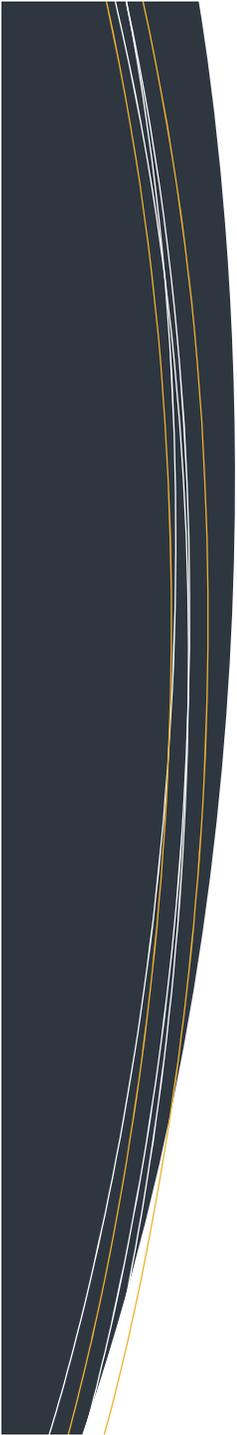
\$1 million towards workforce development activities

\$800,000 for Main Street Revitalization Program

\$655,000 for administration

\$278,000 for technical assistance

Section 108 loan program—up to \$80 million



Annual Goals and Objectives (continued)

CDBG-DR funds:

\$5.5 multifamily housing (<51% AMI)

\$4.4 million for owner occupied rehabilitation (100% AMI)

\$3.5 million for comprehensive revitalization

\$1 million for workforce development

\$11 million for stormwater improvements

Annual Goals and Objectives (continued)

HOME funds:

\$3.2 million rental projects (competitive funding)

\$1 million homeownership projects (competitive funding)

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

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

\$250,000 for CHDO operating and predevelopment

\$900,000 administrative uses (\$550,000 internal and \$350,000 organizational capacity building)

Tenant Based Rental Assistance (TBRA) will be funded with funds remaining from program years (PYs 2013 and 2014)

Annual Goals and Objectives (continued)

ESG funds:

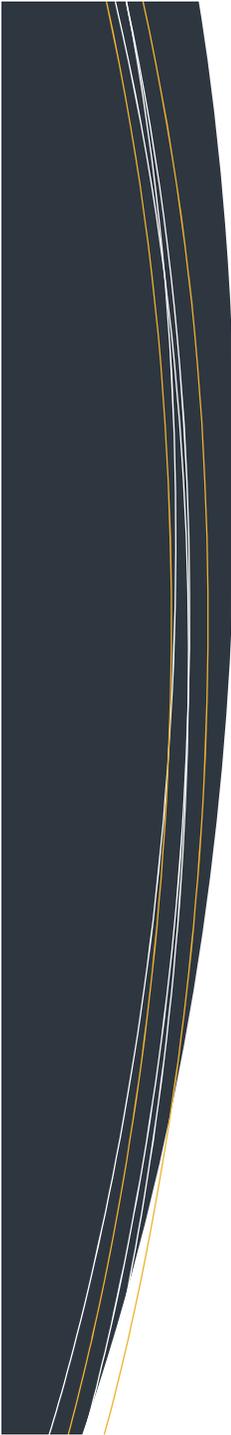
\$1.7 million emergency shelters with operations and essential services

\$1.45 million rental assistance for rapid re-housing

\$72,000 rental assistance associated with homeless prevention

\$124,000 outreach activities

\$270,000 program administration



Annual Goals and Objectives (continued)

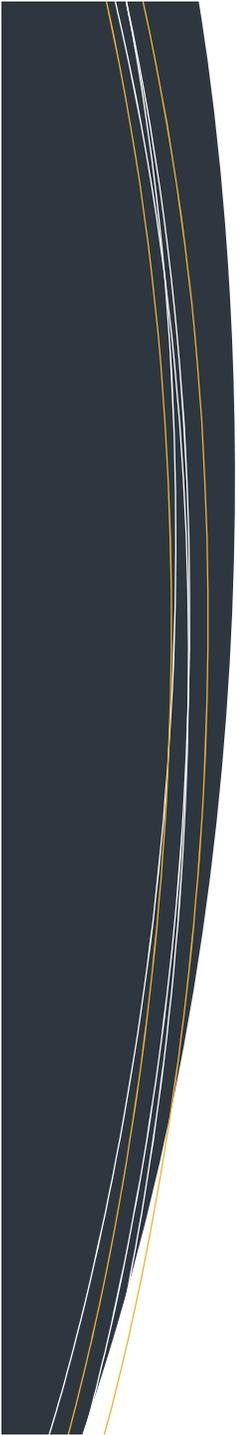
HOPWA funds:

\$425,000 in TBRA

\$212,000 for housing information activities

\$170,000 short-term rental, utilities and mortgage assistance

\$90,000 support facility operations and supportive services



Your Input

- **What do you think of the 2015-2019 Consolidated Plan and/or 2015 Action Plan?**
- **What do you like best? The least?**
- **What questions and comments do you have today?**

How to Comment on the 2015 Action Plan

- Through May 13, 2015 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>

**NOTICE OF PUBLIC HEARING
FY 2015 CONSOLIDATED PLAN FOR FUNDING**

Para ver una versión española de este anuncio de la audición, www.in.gov/ocra visita. Para traducciones al español de los documentos mencionados en este anuncio, escribir al Indiana Office of Community and Rural Affairs, One North Capitol, Suite 600, Indianapolis, Indiana 46204, o E-mail coscott@ocra.in.gov.

**INDIANA OFFICE OF COMMUNITY AND RURAL AFFAIRS
INDIANA HOUSING AND COMMUNITY DEVELOPMENT AUTHORITY**

Pursuant to 24 CFR part 91.115(a)(2), the State of Indiana wishes to encourage citizens to participate in the development of the State of Indiana Consolidated Plan for 2015. In accordance with this regulation, the State is providing the opportunity for citizens to comment on the 2015 Consolidated Plan draft report, which will be submitted to the US Department of Housing and Urban Development (HUD) on or before May 15, 2015. The Consolidated Plan defines the funding sources for the State of Indiana's four (4) major HUD-funded programs and provides communities a framework for defining comprehensive development planning. The FY 2015 Consolidated Plan will set forth the method of distribution of funding for the following HUD-funded programs:

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

These public hearings will be conducted across the state. Your choice of public hearing time and date are:

Thursday, April 23rd

Indianapolis

Indiana State Fairgrounds
Discovery Hall, Suite 201
1202 East 38th Street
Indianapolis, IN 46205
2:30 p.m. or
5:30 p.m. EDT

Rensselaer

Purdue Extension Office
2530 North McKinley Avenue
Suite 1
Rensselaer, IN 47978
1:30 p.m. or
4:30 p.m. Central

Vincennes

Southwest Purdue Ag Program
4369 North Purdue Road
Vincennes, IN 47591
2:30 p.m. or
5:30 p.m. EDT

Huntington

Purdue Extension Office
Courthouse Annex, Suite 202
354 North Jefferson Street
Huntington, IN 46750
2:30 p.m. or
5:30 p.m. EDT

Scottsburg

Purdue Extension Office
1 East McClain Ave., Ste. 30
Scottsburg, IN 47170
2:30 p.m. or
5:30 p.m. EDT

All members of the public are invited to review the draft Plan prior to submission April 14, 2015 through May 13, 2015 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 IHEDA website (www.in.gov/iheda) and the OCRA website (www.in.gov/ocra).

Written comments are invited from Tuesday, April 14, 2015 through Wednesday, May 13, 2015, at the following address:

**2015 Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027**

Persons with disabilities will be provided with assistance respective to the contents of the Consolidated Plan. Interested citizens and parties who wish to receive a free copy of the Executive Summary of the FY 2015 Consolidated Plan or have any other questions may contact the Indiana Office of Community and Rural Affairs at its toll free number 800.824.2476, or 317.233.3762, during normal business hours or via electronic mail at coscott@ocra.in.gov.

Milk 1

Comments

April 21, 2015

2015-2019 Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

To whom it may concern:

Please consider the following input in response to your draft 2015-2019 Consolidated Plan:

1. With respect to housing conditions and poverty, it is laudable to provide affordable rental housing to under-resourced families as a safety-net initiative. But I can find no credible data that suggests that provision of affordable rental housing contributes to a family rising from poverty. In contrast, HUD's "Evidence Matters, Paths to Homeownership for Low-Income and Minority Households" states:
 - a. Homeownership contributes to financial security and stability by offering homeowners protection from rising housing costs, increased savings and purchasing power, the ability to borrow against the equity of the home, and the opportunity to refinance at lower interest rates;
 - b. Financial gain is not the only reason a majority of American households aspire to own a home; social benefits are also associated with homeownership. In a recently released National Housing Survey sponsored by Fannie Mae, the most cited reasons for wanting to own a home were to have a good place to raise children, a safe place to live, more space for family, and control over one's living space. Herbert and Belsky found that the nonfinancial benefits associated with homeownership, which have been linked to better physical and psychological health, are evident but not assured. Some of these benefits pertain to greater satisfaction — with life, one's home, and one's neighborhood;

- c. Other positive effects identified with homeownership include improved outcomes for children.

It is recommended that home ownership opportunities be expanded through the HOME and CDBG programs.

2. In section MA-20 Condition of Housing, Need for owner and Rental Rehabilitation, the poor conditions of rental housing will not be materially impacted by continual government-financed rehabs.

It is recommended that IHCD beef up expectations for on-going maintenance by landlords and monitor more closely rental developments supported by HOME funds.

3. In section SP-05 Strategic Plan Overview, there is not one mention of home ownership initiatives.

It is recommended that IHCD stop giving lip service to home ownership and address it substantively, backing it with resources.

4. In section SP-25 Housing Priority Needs, homeowner housing is narrowly defined as "visitable" and for those aging in place. While it is commendable that IHCD recognizes the special housing needs of persons with disabilities and the aging populations, it is puzzling as to why these populations are only mentioned with respect to homebuyer housing.

It is recommended that resources made available for homebuyer projects not be narrowly designated for special populations at a rate higher than for rental projects.

The inclusion of "green building" as a priority housing need is dubious. I applaud the emphasis on energy efficiency, but such standards such as the NAHB green standards include far too many non-essential and costly features.

It is recommended that the larger focus be on energy efficiency, not "green."

I fail to see the relevance of "projects that utilize minority-owned, women owned and disadvantaged business enterprises" as a Housing Priority Need.

It is recommended that IHCD not confuse "need" with regulations and guidance.

5. On page 76, the HOME match requirement is 25%.

It is recommended that each and every HOME project be required to produce the 25% match. The practice of using match from previously-funded programs should cease.

6. On page 80, the HOME allocation of \$1,000,000 to "owner occupied housing" states that 125 household housing units will be added. That amounts to \$8,000 per unit. It is

apparent that IHCD does not intend to support newly constructed units and instead plans to allocate these funds to “preserving” existing owner housing stock.

It is recommended that additional HOME funds be assigned to home ownership housing for adding housing stock.

7. In section SP-70, there is an attempt to say that, in spite of a formal state anti-poverty strategy, this plan addresses that issue. The verbiage is not impressive. It is best to say nothing when you have nothing of substance to say. There is no empirical evidence that the mainstay strategy of IHCD’s affordable housing plan, provision of affordable rental housing, has any correlation with families rising from poverty.

It is recommended that the State of Indiana embrace “Bridges out of Poverty” (modeled in Indiana in South Bend, Morgan County, and Putnam County) and then create housing strategies that are integrated into local needs as opposed to state priorities.

8. In the discussion of IHCD’s application for funding processes, narrowly mis-titled, “IHCD HOME 2015 FY Rental Policy, March 2015”, it is stated that “Rental and homebuyer developments will compete in the same round...” But on page 80, in the presentation of proposed uses of HOME funds, #10 homeowner housing under the column “funding”, in contrast to #9, rental developments, contains no language pertaining to competitive rounds.

It is recommended that competitive rounds of funding be used for homebuyer projects, with an increase in the funds available for such projects.

It is recommended that in the scoring protocol for homebuyer projects, that only criteria that are specific to homebuyer projects be used and that all references to rental development be excluded. Example: Development Features 3) Design Features, “playground and community room.” Another example: 8.4 Capacity 2) Certifications. Only those certifications germane to homebuyer projects be included

It is recommended that IHCD review the points attributed to the various services in Project Characteristics 4/ Services and with assistance from homebuyer developers, re-assign values that are more appropriate for homebuyer clients.

It is recommended that homebuyer project scoring criteria be re-evaluated to insure that every applicant, regardless of the type of project, has an equal opportunity to score the same number of points as other applicants. As one example, because developers of new construction housing cannot score points in 8.2 Development Features 1) Existing Structures, there should either be another scoring opportunity not available to developers utilizing existing structures, or the point threshold modified to eliminate the unfairness.

Mills 4

It is recommended that the definition of infill be re-worked to eliminate the unfair advantage of developments in cities and towns. It is further recommended that the scoring duplication of "returning vitality to the neighborhood" be eliminated in 8.2 Development Features sections 2) and 3).

It is recommended that in 8.2 Development Features, 6) Green Building, that Touchstone Energy be recognized as being comparable to Energy Star. See previous discussion of the NAHB & LEED as being over-kill and not necessary or even desirable for most affordable housing developments. Focus on energy saving features for the homebuyer.

It is recommended that in 8.5 Financing, Public Participation and 2) Leveraging of other Sources, the standards be raised for scoring points. 5% is an embarrassing goal for the maximum points. Recommended are:

1% - 4.99%	1
5% - 9.99	2
10% - 14.99%	3
15% - 19.99%	4
20% and over	5

It is recommended that points for 8.6 Unique Features 1) be eliminated. In a scoring protocol that demands a fixed minimum scoring threshold, an entirely undefined and subjective scoring category such as this is rife with opportunity for agency, even staff bias.

I stand ready to discuss these issues further and offer my time and resources to assist IHCD in making changes in these areas.

Sincerely,

Joseph Mills

Premium Tomato & Food Products



1500 Tomato Country Way • P.O. Box 83 • Elwood, IN 46036 • Tel. (765) 557-5500 • Fax (765) 557-5501 • www.redgold.com

April 28, 2015



Premium Tomato & Food Products

Steve Austin
Government Relations

2015-2019 Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol, Suite 600
Indianapolis, Indiana 46204-2027

Red Gold
Corporate Headquarters
1500 Tomato Country Way
P.O. Box 83
Elwood, IN 46036

Office 765.557.5500 Ext. 1311
Fax 765.557.5501
E-mail: saustin@redgold.com
www.RedGold.com

Dear Consolidated Plan Review Team:

Red Gold is writing to encourage maintaining funding for Migrant Farm Worker Housing. Whether the committee changes funding opportunities to a smaller percentage or offers the program fewer times during cycles, we firmly believe it is important that seasonal Migrant Farm Worker Housing be represented.

Indiana has been unique in providing grants for seasonal housing, only a handful of states offer such funding. Indiana's funding resulted in new construction and upgrades to existing migrant housing that otherwise would not have happened. Having such funding (better housing) placed Indiana seasonal employers at a distinct advantage against other employers at a time when the availability of seasonal labor dramatically shrank. Seasonal labor has become a *very critical* issue in agriculture nation-wide. Crops in California have been going to waste. This phenomenon is due to the multi-decade failure of Congress to enact a usable guest worker program. That is an issue about which your agency has no control, but it is a factor. The point is, because Indiana had a program to encourage and help employers of seasonal workers build better housing, those employers have been able to withstand the labor shortage and attract seasonal workers when employers in other states could not.

Most Migrant workers fall below 30% of the area median income. That population cannot pay market rents, even if short-term rentals in rural locations were available, which they are not. Indiana farmers, corn seed growers, wineries, orchards, melon growers, food processors and etcetera, all rely on seasonal labor. They cannot charge market rents to justify large investments in housing. To compound that problem, seasonal housing is used during a short window; it is simply cost prohibitive, but Indiana's grant program rectified that problem.

Red Gold local units of government were recipients of early Migrant Farm Worker grants. We speak from experience in defense of that great program and how it has helped the ultimate beneficiaries - Migrants. We hope discussion will be given to rethinking total elimination of this important tool which gives better opportunities to a vulnerable population.

Sincerely,


Steve Austin
Government Affairs

APR 30 2015

Gehlhausen 1 of 1

From: Lisa Gehlhausen <lisa@ind15rpc.org>

Date: May 12, 2015 at 9:21:38 AM EDT

To: "'Weissenberger, Kathleen A.'" <kweissenberger@ocra.IN.gov>

Subject: Consolidated Plan comments

Kathleen,

Following are written comments regarding the 2015 Consolidated Plan.

1. Increase the maximum grant for WDW and PFP.
2. Don't count Planning Grants toward the maximum allowable CDBG grants.
3. Include monetary incentive above the maximum grant for inclusion of green practices into all projects.
4. Minimum 10% match for WDW projects for communities with greater than 57% LMI.
5. Section 108 Loan/CDBG combination project point incentive.
6. Maintain funding for fire trucks.
7. BCP 25 point incentive if the site has an EPA # or IDEM #. Currently the points are only awarded with an IFA #.

Lisa Gehlhausen, Executive Director
Indiana 15 Regional Planning Commission
221 E First Street
Ferdinand, IN 47532
812-367-8455

1

From: "Amy Miller" <cornerstonegrants@gmail.com>
Date: May 11, 2015 at 10:34:41 AM EDT
To: "'Weissenberger, Kathleen A.'" <kweissenberger@ocra.IN.gov>
Subject: RE: ConPlan Comments

Kathleen,

I would like to add a few additional comments:

1. Additional funding for dam improvements. I've had several communities seeking funding. I'm always telling them that OCRA doesn't have any more funds.
2. Should a community pay for engineering design fees before grant application, it would be nice to allow those costs to be included as match for longer than the 18 months. With OCRA only having the one funding round per year it could take a lot longer for communities to get funded and they should not be penalized for paying those costs that are necessary for the information required within the grant applications.

Thank you.

Amy M. Miller, Grant Administrator
Cornerstone Grants Management, Inc.
317-902-2167



INDIANA OFFICE OF
Community & Rural Affairs
Where Rural Matters



ihcda
Indiana Housing & Community Development Authority

Indiana Analysis of Impediments to Fair Housing Choice

We want to hear from you!

Please let us know about fair housing barriers you/your clients/others you know have encountered and/or state policies and practices that concern you. If you would like to receive an email notification when the Draft Analysis of Impediments is available for public comment, please make sure you include your name and email address below. Thank you!

Name: JEAN Ishmon Email: jeanish@AOL.COM

Did you come to Northwest Indiana to meet with or talk to anyone? If not, we would like to be included and can provide agencies & staff people to contact. If you want to come up, we can also provide locations and participants.

Please notify me when the draft is available for public comment.

Barnhart 1

Scott, Corrie

From: Scott, Corrie
Sent: Tuesday, May 12, 2015 4:12 PM
To: 'Ann Barnhart'
Cc: Sipe, Jacob; Traci Taylor; dlmccart1@aol.com
Subject: RE: Feedback on 2015-2019 Five Year Consolidated Plan

Dear Ms. Barnhart,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Ann Barnhart [<mailto:AnnB@ilcein.org>]
Sent: Tuesday, May 12, 2015 3:49 PM
To: Sipe, Jacob; Scott, Corrie; Traci Taylor; dlmccart1@aol.com
Subject: Feedback on 2015-2019 Five Year Consolidated Plan

May 12, 2015

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov
and
Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2288
Attn. Ms. Corrie Scott
coscott@ocra.in.gov.

Dear Mr. Sipe and Ms. Scott,

I would like to thank you and IHCDA and OCRA for the opportunity to comment on the 2015-2019 Five Year ConPlan. As a person with disability who is renting an apartment in Indiana and works with others with disabilities, my primary concern is the pressing need for an increase in the availability of integrated, affordable and accessible housing for people with disabilities and older adults. This can be achieved through rental and

Barnhart 2

homeownership opportunities, as well as home modification initiatives. The following are recommendations for the 2015-2019 Five Year ConPlan.

1. 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 and accessible housing through the IHCDA Section 8 Housing Choice Voucher program.

Thank you for continuing to provide national leadership in the deinstitutionalization movement and in the implementation of the Olmstead decision through the allocation of these housing vouchers. I am proud to be associated with such leadership.

2. Increase the availability of integrated, affordable and accessible housing for people with SSI incomes or lower who live in the community and are not institutionalized. I believe that this should include those who are renting.

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, the fastest growing affordable housing over the past decade, has been largely unaffordable for those with SSI incomes – people with disabilities are “priced out” of this housing market. We must use ConPlan, Section 8 and Continuum of Care related resources 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 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 see: www.tacinc.org Click on Publications.

3. Assist individual jurisdictions to adopt visitability ordinances that mandate basic access in all new housing (e.g., single family home, townhouse) not yet covered by current law or policy (with exemption from the zero-step entrance where topographical features make that unfeasible). Basic access features are defined in 2009 ICC A117.1, Accessible and Useable Buildings and Facilities.

IHCDA needs to establish, at minimum, policies that provide a *threshold requirement* for federally financed housing developers to construct new housing with basic access or visitability standards. The state of Oregon, Chicago and Urbana, IL and Austin, TX have all passed ordinances that mandated visitability features in single-family housing paid for with public funds.

It is recommended that opportunities be enhanced for the education of architects, designers, developers and builders of single-family housing and town homes on accessibility requirements to meet visitability standards. Visitability features are slowly being incorporated in new construction; however it is unclear exactly what standards will be used. A concerted effort to educate professionals on visitability standards as defined by 2009 ICC A117.1 is needed and will help to create the uniformity needed to assure basic access, as intended.

4. 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 demonstrated a high percentage of multi-family housing in Central Indiana was found to be non-compliant with the Fair Housing Accessibility Standards. It can be assumed that properties throughout Indiana may also have similar compliance issues.

5. ALL new federally financed Section 504 accessible and affordable housing needs to be affordable for those with SSI incomes (<20% Area Median Income).

All existing accessible federally funded housing needs to be made affordable for those with SSI incomes, including units developed through the Low Income Housing Tax Credit program (LIHTC). Although LIHTC is not included in the ConPlan allocation of funds, it has been the fastest growing affordable housing in the state. Where as improvements in the affordability of these units at the 30% or less AMI is evident when solid planning is completed with community disability related organizations, a designation of units being affordable at the 18 % or below would assure access for all who qualify and apply.

The IHCD is to be commended for the incentives in the Qualified Allocation Plan that encourage developers to increase the percentage of the number of Section 504 accessible units. The response has been very positive. It is recommended that these incentives not only be maintained but, also strengthened by the provision of rental subsidies or affordability standards for these units.

6. Increase the availability of home modification funds for people with disabilities and older adults to assure housing stability and safety. Home modification funds need to be available for both homeowners and renters.

I have seen direct need for this as evidenced by the Consumers I work with who are transitioning out of nursing homes. Their families are told that their loved one will not be released back to their home until certain home modifications have been made to ensure their safety in their home. These modifications are often very costly and there are not programs to assist with funding the necessary modifications. While we are aware that there are Owner Occupied Rehab. funds for home modifications, these funds are most often used for major improvements and renovations such as roofs and furnace repair. These costly repairs often leave no resources for the desperately needed home modifications in areas such as bathrooms and hallways.

By 2040, 1 in 5 Hoosiers will be 65 or older. Currently there are about 1 million Hoosiers age 60 and older. Older Hoosiers have consistently expressed a desire to age in place. When asked 94% of older Hoosiers would like to remain in their current residence as long as possible, unfortunately 39% are not very confident they will be able to afford to do so. (Source: Dr. Phil Stafford. 2008 Indiana AdvantAge Initiative survey results. For a complete report see website: www.agingindiana.org).

There are 44,030 Indiana renters with mobility and self-care limitations, including those 62 and older, whose household incomes are less than 30% of the AMI.(Source: 2000 CHAS Data Book) Home modification funds through IHCD are currently restricted for use to homeowners. Those who rent and need to make internal modifications to the unit do not have access to HOME or CDBG funds to help with the cost. Making internal modifications remains the renter's expense for those who are unable to locate a suitable rental unit in the community.

The reference to the use of home modification funds towards rental housing in the ConPlan related survey is appreciated and indicates a first step towards better understanding this need. Many persons with disabilities are unable to afford to buy a home.

Barnhart cf

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

In some instances, home ownership is the best (or only option) for a person who needs accessible housing or who requires specific types of locations (e.g., avoid spraying of corn fields) and the use of specific building materials construction, such as those living with Multiple Chemical Sensitivities. Those with Section 8 Housing Choice Vouchers could create a permanent home with access to the mortgage program.

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

I would like to see this program re-established. There are a growing number of people with disabilities who unable to live in rental properties due to a lack of accessible of units. I also would like to see it become a threshold requirement that non-profit organizations like Habitat for Humanity be required to accept section 8 vouchers for the down payment. This would increase affordability and increase families served by Habitat for Humanity as well.

We hope to see a shift in the proposed budget for the coming year to address both the critical affordability housing needs identified and the growing need for existing and new housing that can be used by all of Indiana's citizens.

Thank you for this opportunity and for your continued leadership. Please feel free to contact me for further comment or questions/

Sincerely,

Ann Barnhart
Member of the Back Home in Indiana Alliance
annb@ilcein.org
(765) 967-0940

Scott, Corrie

From: Scott, Corrie
Sent: Tuesday, May 12, 2015 4:20 PM
To: 'Peter Ciancone'; Sipe, Jacob
Cc: dlmccart1@aol.com
Subject: RE: State of Indiana Consolidated Plan

Dear Mr. Ciancone,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Peter Ciancone [<mailto:petecinc@thewillcenter.org>]
Sent: Tuesday, May 12, 2015 4:10 PM
To: Sipe, Jacob; Scott, Corrie
Cc: dlmccart1@aol.com
Subject: State of Indiana Consolidated Plan

See attached.

Peter Ciancone
Executive Director
The WILL Center
One Dreiser Square
Terre Haute, IN 47807
office (812) 298-9455
cell (812) 240-6056
fax (812) 299-9061
petecinc@thewillcenter.org



The Will Center 2

May 12, 2015

Indiana Housing & Community Development Authority
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2288
Attn. Ms. Corrie Scott

To Whom It May Concern:

I write this letter to provide input from our independent living center to the draft of the new Consolidated Plan for the state.

I am the executive director of The WILL Center, a private, not-for-profit, non-residential agency that serves people of all ages and any disability or combination of disabilities. In the daily course of serving our consumers, several housing needs consistently arise:

- The availability of affordable, accessible housing for our population remains a problem. There are waiting lists for such properties and while our Center has a well-developed and active program to build ADA compliant wheelchair ramps onto private properties, accessibility is a key concern that often forces individuals to choose between staying in their community and seeking institutionalization.
- We would be pleased if you would consider making funding available for these necessary home modifications. While we have a strong program building ramps, these are often just part of what is needed.
- Section 8 vouchers are essential tools that we use to keep individuals in the community. They provide key assistance for renters. We would like to see the program that allows the vouchers to be used to pay for mortgage payments for single family units to be reestablished.
- We recommend that 100 percent of housing constructed using IHEDA funds be visitable at a minimum and we ask that we reconsider minimum requirements for construction accessible housing using these funds. The minimum requirements are not allowing us as a community to “catch up” with the current shortage.

Thank you for the opportunity to provide input to this planning process. I would be pleased to answer any questions you may have.

Peter C. Ciancone
Executive Director

Burk 1

Scott, Corrie

From: Scott, Corrie
Sent: Tuesday, May 12, 2015 4:21 PM
To: 'Kevin Burk'
Subject: RE: Indiana Consolidated Plan Letter

Dear Mr. Burk,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Kevin Burk [<mailto:kevin@sicilindiana.org>]
Sent: Tuesday, May 12, 2015 4:17 PM
To: Scott, Corrie
Cc: chris@sicilindiana.org
Subject: Indiana Consolidated Plan Letter

Dear, Miss Scott

My name is Kevin Burk and I am a disabled citizen of Washington County Indiana, as well as the Washington County Coordinator and disability advocate for S.I.C.I.L. (Southern Indiana Center for Independent Living). The reason I am writing this letter is to bring to light some issues that I have been addressing while working on Accessible Living projects and also some solutions I may be able to offer with respect to your policies and procedures.

First off let me start with some main core issues that have been popping up more than any others, and that has been a personal struggle for me in finding an accessible home. Availability is a big factor in finding accessible living in my county of residence. It seems that there are not many houses that are available to hard working citizens as I as there are to more capable individuals when it comes to physicality and mobilization. I have been noticing that the main factors in these homes not being accessible are the entrances, thresholds, bathrooms, and hallways. I have been struggling with Vascular Muscular Dystrophy my whole life and these factors I have just described are what hinders me from being able to have the same experiences and opportunities that others have and being a law abiding, taxpaying, and hard working citizen like yourself I wish that was not so, It just doesn't seem fair does it?

Recently I have been attending multiple conferences around Indiana such as the Governors Council for disabilities focus Group with Matt Rayburn, to discuss concerns and issues that we need to address with accessible housing, the Governors Council Disability Awareness Month to look at what was available for those who advocate on behalf of those with disabilities, and the IFHC (Indiana Fair Housing Committee) with the Indiana Back Home Alliance with Deb McCarty to learn about what funds were out there to help

Burk 2

with the issues we are facing with housing needs. With the funds and programs that are available through HUD such as the CDBG, CDBG-D (Community Development Block Grant), the HOME (Home Investment Partnerships), and ESG (Emergency Solutions Grant) we are looking at millions of dollars that could be used for housing needs that are not being utilized and correctly dispersed to those organizations that are in the position to help.

Here is what I would like to see done in the coming future for individuals with disabilities and organizations that are trying to help eradicate these situations that seem to plague our disability communities. The first thing I would take under a magnifying glass is the section 8 program and ask questions about why all the money set aside isn't being used and why more people who are disabled are not on this program to help them have reliable, accessible, and safe housing. Why landlords are so against wanting to accept section 8 and what can be done to help resolve their concerns. More homes being built from the ground up starting with the idea of visitability and accessibility at the helm and driving the contractors agendas. Homes that are already built having the opportunity to make their homes more accessible not just home owners but renters as well. More opportunity for individuals with disabilities that have children and spouses to become home owners with their limited incomes with programs such as Habitat for Humanity and Local Rural Developments.

The main goals for HUD as you know are to create descent housing, provide a suitable living environments, and expand economic opportunities. I implore you to help us do this and let our concerns in this letter be known and discussed in the Indiana Consolidated Plan coming up and try your best to help fix and answer some of these issues people like me face every day.

Thank you for your time and consideration of these issues.

Sincerely,

Kevin Burk

WASH CO. COORDIANTOR FOR S.I.C.I.L. (Southern Indiana Center for Independent Living)

--

Thanks,

Kevin Burk

Washington County Coordinator

Southern Indiana Center for Independent Living (SICIL)

Phone: (812)-277-9626, (812)-570-0208

kevin@sicilindiana.org

Rodgers /

Scott, Corrie

From: Scott, Corrie
Sent: Tuesday, May 12, 2015 4:18 PM
To: 'Brian rogers'; Sipe, Jacob; tracit@ilcein.org; deb mcCarty
Subject: RE: 2015-2019 Five Year ConPlan comment letter

Dear Mr. Rodgers,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Brian rogers [mailto:swordsman90@hotmail.com]
Sent: Tuesday, May 12, 2015 4:11 PM
To: Sipe, Jacob; Scott, Corrie; tracit@ilcein.org; deb mcCarty
Subject: 2015-2019 Five Year ConPlan comment letter

May 12, 2015

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov
and
Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2288
Attn. Ms. Corrie Scott
coscott@ocra.in.gov.

*repeated
on
next
page*

Dear Mr. Sipe and Ms. Scott,

I would like to thank you and IHCDA and OCRA for the opportunity to comment on the 2015-2019 Five Year ConPlan. As a person with disability who is renting an apartment in Indiana and has worked with others with disabilities, my primary concern is the pressing need for an increase in the availability of integrated, affordable and accessible housing for people with disabilities and older adults. This can be achieved through rental and

Rodgers 2

Scott, Corrie

From: Brian rogers [swordsman90@hotmail.com]
Sent: Tuesday, May 12, 2015 4:11 PM
To: Sipe, Jacob; Scott, Corrie; tracit@ilcein.org; deb mcCarty
Subject: 2015-2019 Five Year ConPlan comment letter

May 12, 2015

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov
and
Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2288
Attn. Ms. Corrie Scott
coscott@ocra.in.gov.

Dear Mr. Sipe and Ms. Scott,

I would like to thank you and IHCD and OCRA for the opportunity to comment on the 2015-2019 Five Year ConPlan. As a person with disability who is renting an apartment in Indiana and has worked with others with disabilities, my primary concern is the pressing need for an increase in the availability of integrated, affordable and accessible housing for people with disabilities and older adults. This can be achieved through rental and homeownership opportunities, as well as home modification initiatives. The following are recommendations for the 2015-2019 Five Year ConPlan.

1. 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 and accessible housing through the IHCD Section 8 Housing Choice Voucher program.

Thank you for continuing to provide national leadership in the deinstitutionalization movement and in the implementation of the Olmstead decision through the allocation of these housing vouchers. I am proud to be associated with such leadership.

2. Increase the availability of integrated, affordable and accessible housing for people with SSI incomes or lower who live in the community and are not institutionalized. I believe that this should include those who are renting.

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, the fastest growing affordable housing over the past decade, has been largely unaffordable for those with SSI incomes – people with disabilities are “priced out” of this housing market. We must use ConPlan, Section 8 and Continuum of Care related resources 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 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 see: www.tacinc.org Click on Publications.

3. Assist individual jurisdictions to adopt visitability ordinances that mandate basic access in all new housing (e.g., single family home, townhouse) not yet covered by current law or policy (with exemption from the zero-step entrance where topographical features make that unfeasible). Basic access features are defined in 2009 ICC A117.1, Accessible and Useable Buildings and Facilities.

IHCDA needs to establish, at minimum, policies that provide a *threshold requirement* for federally financed housing developers to construct new housing with basic access or visitability standards. The state of Oregon, Chicago and Urbana, IL and Austin, TX have all passed ordinances that mandated visitability features in single-family housing paid for with public funds.

It is recommended that opportunities be enhanced for the education of architects, designers, developers and builders of single-family housing and town homes on accessibility requirements to meet visitability standards. Visitability features are slowly being incorporated in new construction; however it is unclear exactly what standards will be used. A concerted effort to educate professionals on visitability standards as defined by 2009 ICC A117.1 is needed and will help to create the uniformity needed to assure basic access, as intended.

4. 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 demonstrated a high percentage of multi-family housing in Central Indiana was found to be non-compliant with the Fair Housing Accessibility Standards. It can be assumed that properties throughout Indiana may also have similar compliance issues.

5. ALL new federally financed Section 504 accessible and affordable housing needs to be *affordable* for those with SSI incomes (<20% Area Median Income).

All existing accessible federally funded housing needs to be made affordable for those with SSI incomes, including units developed through the Low Income Housing Tax Credit program (LIHTC). Although LIHTC is not included in the ConPlan allocation of funds, it has been the fastest growing affordable housing in the state. Where as improvements in the affordability of these units at the 30% or less AMI is evident when solid planning is completed with community disability related organizations, a designation of units being affordable at the 18 % or below would assure access for all who qualify and apply.

The IHCDA is to be commended for the incentives in the Qualified Allocation Plan that encourage developers to increase the percentage of the number of Section 504 accessible units. The response has been very positive. It is recommended that these incentives not only be maintained but, also strengthened by the provision of rental subsidies or affordability standards for these units.

Rodgers 4

6. Increase the availability of home modification funds for people with disabilities and older adults to assure housing stability and safety. Home modification funds need to be available for both homeowners and renters.

I have worked with several people in nursing facilities over the years whom would benefit from this allowing them to live more independently back in their own homes. Their families are told that their loved one will not be released back to their home until certain home modifications have been made to ensure their safety in their home. These modifications are often very costly and there are not programs to assist with funding the necessary modifications. While we are aware that there are Owner Occupied Rehab. funds for home modifications, these funds are most often used for major improvements and renovations such as roofs and furnace repair. These costly repairs often leave no resources for the desperately needed home modifications in areas such as bathrooms and hallways.

By 2040, 1 in 5 Hoosiers will be 65 or older. Currently there are about 1 million Hoosiers age 60 and older. Older Hoosiers have consistently expressed a desire to age in place. When asked 94% of older Hoosiers would like to remain in their current residence as long as possible, unfortunately 39% are not very confident they will be able to afford to do so. (Source: Dr. Phil Stafford. 2008 Indiana AdvantAge Initiative survey results. For a complete report see website: www.agingindiana.org).

There are 44,030 Indiana renters with mobility and self-care limitations, including those 62 and older, whose household incomes are less than 30% of the AMI. (Source: 2000 CHAS Data Book) Home modification funds through IHCD are currently restricted for use to homeowners. Those who rent and need to make internal modifications to the unit do not have access to HOME or CDBG funds to help with the cost. Making internal modifications remains the renter's expense for those who are unable to locate a suitable rental unit in the community.

The reference to the use of home modification funds towards rental housing in the ConPlan related survey is appreciated and indicates a first step towards better understanding this need. Many persons with disabilities are unable to afford to buy a home.

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

In some instances, home ownership is the best (or only option) for a person who needs accessible housing or who requires specific types of locations (e.g., avoid spraying of corn fields) and the use of specific building materials construction, such as those living with Multiple Chemical Sensitivities. Those with Section 8 Housing Choice Vouchers could create a permanent home with access to the mortgage program.

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

I would like to see this program re-established. There are a growing number of people with disabilities who unable to live in rental properties due to a lack of accessible of units. I also would like to see it become a threshold requirement that non-profit organizations like Habitat for Humanity be required to accept section 8 vouchers for the down payment. This would increase affordability and increase families served by Habitat for Humanity as well.

Rodgers 5

We hope to see a shift in the proposed budget for the coming year to address both the critical affordability housing needs identified and the growing need for existing and new housing that can be used by all of Indiana's citizens.

Thank you for this opportunity and for your continued leadership. Please feel free to contact me for further comment or questions/

Sincerely,

Brian Rodgers
Member of the Back Home in Indiana Alliance
swordsman90@hotmail.com
(765) 967-8590

Lounds 1

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 12:49 PM
To: 'Jonathan Lounds'; Sipe, Jacob
Subject: RE: 2015-2019 Five Year ConPlan Public Comment

Dear Mr. Lounds,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Jonathan Lounds [<mailto:jonlounds@gmail.com>]
Sent: Wednesday, May 13, 2015 11:55 AM
To: Scott, Corrie; Sipe, Jacob
Subject: 2015-2019 Five Year ConPlan Public Comment

Ms. Corrie Scott
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-22288
coscott@ocra.in.gov

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

Dear Ms. Scott & Mr. Sipe,

Thank you for the opportunity to comment on the Consolidated Plan. My main concern is with the use of HOME TBRA funds and home modification funds specifically for people with disabilities. Often people with disabilities have higher rates of poverty and face many housing impediments. These barriers often force people with disabilities into institutionalized settings because their basic needs are not being met. In order to reduce homelessness and institutionalization of people with disabilities, I recommend:

Lounds²

- #1: The remaining FY 2013 & 2014 Home TBRA program funds be allocated to assisting people with disabilities with rental deposits, rental application fees, up to first 6 months worth of rental payments, and possible payment of back rent, and possible payment of back rent & utilities to eliminate barriers to housing
- #2: Increase funds for home modification for people with disabilities and older adults to ensure housing safety and stability. Both homeowners and renters should have access to home modification funds.

Thank you again for the opportunity to provide input of the Indiana Consolidated Plan. Please don't hesitate to contact me with any questions for comments.

Very Respectfully,

Jonathan Lounds
C:317-417-1737
E: jonlounds@gmail.com

Evans 1

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 12:52 PM
To: 'jackie evans'
Subject: Consolidated Plan

Dear Ms. Evans,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: jackie evans [<mailto:jackie@atticin.org>]
Sent: Wednesday, May 13, 2015 10:36 AM
To: Scott, Corrie
Subject: con plan
Indiana Housing and Community Development Authority
Indiana Office of Community and Rural Affairs
One North Capital-Suite 600
Indianapolis, IN 46204-2288
Attn: Ms. Corrie Scott

To whom it may concern:

As a member of Back home in Indiana alliance and an employee of ATTIC, INC., a Independent Living Center for People with Disabilities. In working with both of these organizations and serving our consumers, several housing needs are consistently needed to accomplish goals. These are some of the issues that are on the arise:

- Affordable accessible housing. Being in more Section 8 vouchers.
- Put in modification money with vouchers to make home accessible.
- Vouchers should be for both renters and owners. As well as modification money should also be used for both.

Evans 2

- Adopt visitability, have individual jurisdictions to adopt this ordinances that mandate basic access in all new housing that is not yet covered by current law or policy.

I have work doing Con Plan hearings for 13 years now and there have been more adequate time frames that we could always set our calendars to attend. It seems like that lately that public notice for citizens who attend to participate in these hearings. This year there was just a short time and trying to get the word out was a very hard task for some of us to do. We feel that we did not get the chance to let our voices be heard. Not just some of us, but a lot of us.

I would like to thank IHCDA and it's leadership for putting your effort in continuous improvement in assuring Hoosiers with disabilities affordable and accessible housing and other very important needs.

Again, thank you for the opportunity to provide input into the Indiana Consolidated Plan .

Sincerely,

Jackie Evans
Independent Living Coordinator
ATTIC, INC.
1721 Washington Avenue
Vincennes, In 47591
812-886-0575
jackie@atticindiana.org
Jackie Evans
Jackie@atticin.org
Independent Living Coordinator
812-886-0575

Brockman /

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 3:13 PM
To: 'Andrew Brockman'
Subject: RE: Indiana Consolidated Plan- Public Input

Dear Mr. Brockman,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Andrew Brockman [<mailto:brockman.a@gmail.com>]
Sent: Wednesday, May 13, 2015 1:59 PM
To: Scott, Corrie
Cc: Sipe, Jacob
Subject: Indiana Consolidated Plan- Public Input

Hello,

Please accept the attached letter as my formal input for the 2015-2019 Consolidated Plan. Thank you for the opportunity and I look forward to hearing from you regarding these comments.

-Andrew Brockman

--
Andrew Brockman
cell: 513-607-3221
brockman.a@gmail.com

May 13, 2015

To Whom It May Concern:

Please accept this letter as my formal comments for the 2015-2019 Indiana Consolidated Plan. Thank you for allowing me to write these comments, and provide input into the Consolidated Plan. Below are some comments on the plan and suggestions on making it stronger to affirmatively further fair housing.

Related to the goals of reducing homelessness and increase housing stability for people with disabilities, I do have a few comments. It would make perfect sense for IHCDA to utilize rental subsidy dollars specifically for people with disabilities using the HOME TBRA funds. People with disabilities are the most impoverished population, and therefore need to overcome barriers others never dream of. Because of this, many people with disabilities end up in institutions to get their basic needs met. In order to reduce this, or homelessness, my recommendation is to allocate the remaining HOME TBRA funds (from FY 2013 and 2014) for people with disabilities for expenses associated with renting, including but not limited to rental deposits, rental application fees, up to the first month of rent, and payment of back rent and/or utilities to reduce cumbersome barriers to housing stability.

I would also like to see IHCDA increase the funds for home modifications for people with disabilities and older individuals. These funds need to be available for both homeowners and renters. Much of the time, these funds are used for major home expenses such as repairs to roofs, while in actuality people need minor modifications such as changes to entrances and bathrooms in order to stay in their home.

I thank you for the organization's preference for housing choice vouchers to be given to people leaving nursing homes, and ask you to continue to keep this preference for these individuals.

I also ask that IHCDA assist local jurisdictions in creating and maintaining a visitability preference. Too many new homes are being constructed that shut out people with disabilities and the older population. To counter this problem, asking local jurisdictions to adopt visitability regulations is needed.

Thank you for the opportunity, and I look forward to the new consolidated plan.

Sincerely,
Andrew Brockman

Taylor 1

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 3:36 PM
To: 'Kathleen Taylor'
Subject: RE: IACED Comment Letter for 2015-2019 Indiana Consolidated Plan

Dear Ms. Taylor,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Kathleen Taylor [<mailto:ktaylor@iaced.org>]
Sent: Wednesday, May 13, 2015 3:32 PM
To: Scott, Corrie
Subject: IACED Comment Letter for 2015-2019 Indiana Consolidated Plan

Thank you for your consideration!

Kathleen Taylor
Convener and Policy Director
Indiana Association for Community Economic Development
317-698-2978

Taylor 2



May 13, 2015

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

Dear Ms. Weissenberger:

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.

Part of IACED's efforts to advance these member efforts is engaging them in communities of practice and convening conversations. Through those 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.

GOAL 1. EXPAND AND PRESERVE AFFORDABLE HOUSING OPPORTUNITIES THROUGHOUT THE HOUSING CONTINUUM.

HOMEOWNERSHIP

As has long been the case, Indiana continues to enjoy higher homeownership rates than the national average – a little more than five (5) percent above the national average, 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 increasing figures 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. Further, while the state of Indiana has traditionally invested more funds towards the goal of affordable homeownership, our members have stated that those efforts seem to have evaporated in favor of focusing on affordable rental housing.

IACED members are well aware that significant housing rental needs exist and applaud worthy investments in expanding that stock, but they also note that affordable homeownership remains one of the most important asset building tools for low-income individuals and families. As page 20 of the draft Plan notes, "Severe cost burden is more evenly distributed across owner income categories, with 43 percent earning less than 30 percent AMI and one-fourth earning between 30 to 50 percent AMI..." While IACED is pleased the report does recognize the barriers to homeownership among low-income populations, the Strategic Plan overview on page 69 of the plan lays out the needs the 5-year plan is responding to, which does not list expanding affordable ownership as a need or goal. We believe that Indiana needs a far more balanced approach when it comes to setting goals and allocating resources for affordable rental and homeowner needs.

In relationship to the need for strong homeownership programs throughout Indiana, 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.

TARGETING RESOURCES TO SERVE THE 30 TO 50 PERCENT AMI POPULATION

While there are a number of resources the state and local communities can and are deploying to meet the housing needs of individuals and families at 60-80 percent of AMI, there are simply not enough resources on the ground to adequately serve the needs of those living at 30-50 percent of AMI.

According to the National Low Income Housing Coalition's 2015 Out of Reach housing report, a renter household in Indiana needs an annual income of \$40,240 for a two-bedroom rental unit at the Fair Market Rent to be affordable². At the 30 to 50 percent AMI levels, renters have to spend 63 – 73 percent of their income on rent – a severe housing cost burden.

As pages 16-18 of the draft Consolidated Plan Housing Needs Assessment indicate, the most significant numbers of safe, stable housing impediments, such as functioning plumbing, overcrowding and/or severe

¹ Owner Occupied Housing, American Community Survey, Census of Population and Housing
<http://www.census.gov/quickfacts/table/HSG445213/00,18>

² National Low Income Housing Coalition, Out of Reach 2015 report, www.nlihc.org/oor/2015

cost burden, lie within the zero (0) to 50 percent AMI ranges, with significant need still reflected at the 50 to 80 percent range. While we recognize that the need surpasses available resources, we believe it is important to try and place higher priority within the plan on targeting this vulnerable income demographic as a means to prevent homelessness and lift those individuals and families out of poverty.

OTHER OBSERVATIONS

We have heard and observed from our members that, while it is extremely effective in serving very low-income families in rural areas, scattered site affordable housing property management is exceedingly costly. However, multi-unit apartment complexes simply do not serve the needs of rural communities as well as scattered site developments. We encourage a stronger emphasis on subsidizing scattered site housing investments, in order to have better success in making rural affordable housing a reality.

GOAL 2. REDUCE HOMELESSNESS AND INCREASE HOUSING STABILITY FOR SPECIAL NEEDS POPULATIONS.

EMERGENCY SOLUTIONS GRANTS

While our state and others throughout the country have made great strides to combat the incidence of chronic homelessness, our members serving homeless children and families have experienced dramatic increases in requests for assistance with fewer public resources to respond to that need. We knew this only anecdotally for a while because homeless families and children were not counted or studied in a meaningful way prior to the 2009 McKinney-Vento Re-authorization. Now, however, we have figures that clearly indicate that, while overall homelessness has decreased thanks in large part to the tremendous progress in supporting chronically homeless, there have been dramatic increases in homelessness among families.

According to the State of Homelessness Report 2013, which included data extracted to track changes in certain populations by state from the 2011 to 2012 Geography of Homelessness Report by the National Alliance to End Homelessness, the overall increase in homelessness in Indiana was one (1) percent; however, there was a 26 percent increase in family households experiencing homelessness.³ Further in 2006, one (1) in 50 children were homeless, which is an already daunting figure; but that number has steadily climbed, reaching one (1) in 45 in 2010 and ultimately the current rate of one in 30 as of 2013.⁴

When it comes to serving families, 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 stability⁵. 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

³ National Alliance to End Homelessness, "State of Homelessness Report 2013,"

<http://www.endhomelessness.org/library/entry/the-state-of-homelessness-2013>

⁴ National Center on Family Homelessness, "America's Youngest Outcasts" 2014,

<http://new.homelesschildrenamerica.org/mediadocs/280.pdf>

⁵ 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

Taylor S

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.

Among IACED's shelter members, many have expressed for years that the increasing preference for permanent supportive housing has, in fact, reduced or eliminated financial support for emergency and transitional shelters and supportive services that have proven results in supporting the populations they serve, especially during times of high unemployment.

Our members believe that, as complicated as the causes of homelessness can be and the way in which it affects individuals and families across a broad spectrum of race, ethnicity and economic backgrounds, planning and response should reflect the diversity of needs. Prioritizing the needs of one segment of the population at the expense of worsening the circumstances of other segments is not in the community development interest of our state long-term. As with the homeownership and rental housing recommendations, there must be a more comprehensive, balanced approach when it comes to homeless services in Indiana.

IACED believes that in local planning and in resource priorities, there should be a stronger emphasis on rebuilding more robust emergency shelter and transitional shelter resources and less focus on merely decreasing the shelter stay, since a shelter stay provides access to case management, child care, transportation, education and food security that contribute to long-term homeless recidivism reduction among children and families.

HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS

In recent months, Indiana has been the center of national attention for an emerging HIV epidemic that started in rural southern Indiana. First noted by a health care worker in December, this health care crisis that has grown to 350 new infections in a short time frame is far from resolved or contained. After declaring a public health emergency, Governor Pence 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, a temporary solution to a long-term problem.

This is not merely a health issue. 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.

High level federal health care officials, including Dr. Jonathan Mermin, the director of the National Center for HIV/AIDS, Viral Hepatitis, STD and TB Prevention at the Centers for Disease Control and Prevention in Atlanta, are now stationed in affected counties to help mobilize a health care response to the outbreak this

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/>

Taylor 6

year of 140 new HIV infections.⁷ Of this situation, Dr. Mermin said, "This is one of the worst documented outbreaks of HIV among IV users in the past two decades. It's of import to the CDC as well as the people of Indiana."

Those CDC officials are based at the center of the outbreak of the crisis in Scott County, but all health officials concede this crisis will spread. 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, 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, in order to receive favorable consideration for increased funding.

While the Consolidated Plan was drafted in large part prior to this outbreak, there is no mention of this issue, which is of significant concern to IACED and our members. The draft Consolidated Plan vaguely references some increased cases of infection in Lake County, but it does not address growing concerns about the health care threat presented by housing instable intravenous drug users. 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.

GOAL 3. PROMOTE LIVABLE COMMUNITIES AND COMMUNITY REVITALIZATION THROUGH ADDRESSING UNMET COMMUNITY DEVELOPMENT NEEDS.

We would like to commend the Draft Plan's continued emphasis on comprehensive community planning. We believe this emphasis fosters community development plans that are truly responsive and community-driven. Under the community planning resources, however, we would encourage prioritizing comprehensive community development quality of life planning that engages and empowers local formal and informal leaders in affecting positive change in their communities through the planning process. We would note that the dynamic of the Stellar Communities program, which does address community planning, is that it has been more focused on planning for the purpose of determining needed projects, rather than on the process of coalition building and leveraging local human potential to address local concerns.

Also, as the state has implemented green energy upgrades as a housing priority, it should similarly be reflected in priorities for infrastructure investments.

⁷ Shari Rudavsky, The Indianapolis Star April 28, 2015, "CDC: Indiana has 'one of the worst' HIV outbreaks" <http://www.usatoday.com/story/news/nation/2015/04/28/indiana-hiv-outbreak/26498117/>

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GOAL 4. PROMOTE ACTIVITIES THAT ENHANCE LOCAL ECONOMIC DEVELOPMENT EFFORTS

While it is considered the foundation of helping vulnerable Hoosiers and communities, housing alone will not solve their challenges. Community development activities are needed to leverage the housing investments of Hoosier communities, families and individuals.

As rural communities and small cities seek to capitalize community development projects and attract new business investments in their regions, the issue of outdated zoning ordinances is a rising concern. These communities often lack the resources to make changes to long-outdated ordinances to become economically competitive and responsive to local needs. IACED suggests that OCRA's Planning Grant program be expanded to provide funding to modernize antiquated zoning ordinances.

In order to stimulate local economies, we must increase investments in microenterprise lending. 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 the Plan.

As we have in the past, IACED continues to emphasize the importance of investing in a wide variety of community development activities. A few suggestions include greater discussion around job training and creation initiatives, neighborhood-based commercial development, domestic violence shelters, senior citizen centers, community centers, healthcare centers, daycare centers and others as a community development priority.

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 2015-2019 Consolidated Plan.

Sincerely,

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

Bracken 1

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 3:08 PM
To: 'Allison Bracken'
Cc: Sipe, Jacob
Subject: RE: Indiana Consolidated Plan – Public Input

Dear Ms. Bracken,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Allison Bracken [<mailto:allisonrolls@gmail.com>]
Sent: Wednesday, May 13, 2015 1:44 PM
To: Scott, Corrie; Sipe, Jacob
Subject: Indiana Consolidated Plan – Public Input

Dear Ms. Scott and Mr. Sipe,

Thank you for the opportunity to comment on the 2015 Consolidated 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! Below are a few concerns and recommendations.

1. Concern: People with disabilities are one of the most impoverished minority populations that often have to address far more housing-related (and other types of) barriers than other groups. Because of these additional barriers, a lot of people with disabilities are often forced into an institutional setting just to get their basic needs met in order to avoid homelessness

Recommendation: Utilize rental subsidy dollars specifically for people with disabilities (outside of HIV/Aids population) with HOME TBRA funds. **I recommend allocating the remaining HOME TBRA program funds (from FY 2013 & 2014) to assist with rental deposits, rental application fees, up to first 6 months worth of rental payments, and possible payment of back rent & utilities.**

2. Concern: People with Disabilities and SSI Income Cannot Afford an Apartment or Efficiency in Indiana.

Bracken 2

Recommendation: People with disabilities living on SSI incomes or less cannot afford an apartment or studio in Indiana. Therefore, **I recommend increasing the availability of integrated, affordable and accessible housing.** The rental properties that currently offer units at 30% AMI have very long waiting lists, which creates a barrier for individuals that need housing now. Increasing rental subsidies at 30%AMI by providing more incentives to developers could help as well. Also, converting Section 8 vouchers to project based Section 8 in Tax Credit properties could be another way to increase the number of affordable units for people on SSI. Unfortunately, these individuals that cannot afford housing are more at risk of becoming homeless or institutionalized, which could cost the state more money in the long run, as well as decrease quality of life for many that want to stay in the community and age in place.

3. Concern: Indiana Housing and Community Development Authority (IHCDA) funds for home repair and accessibility modifications are predominantly for major home repairs such as new roofs, furnaces, etc. Given the high cost of these home repairs, little to no funds are available to address the accessibility of entrances, bathrooms, etc. for those wanting to “age in place.”

Recommendation: **Increase the availability of home modification funds for people with disabilities and older adults to assure housing stability and safety. Home modification funds need to be available for both homeowners and renters.**

4. Concern: New Single Family Housing and Town Homes Are Being Built That Shut Out People with Disabilities and Seniors.

Recommendation: I am a wheelchair user and work with people with disabilities. I often need to meet our consumers in their homes and have found it very difficult to do so due to the lack of accessibility. A solution to this going forward would be to **make all renovated and newly constructed single family homes “visitable” to all, meaning wide doors of 32”, access to restrooms and zero threshold entryways.** Even outside of work, being able to visit friends wherever I go is important to me (as I can imagine important to all wheelchair users). Educating developers, architects, and builders on this issue and the “whys” of its importance could be a solution, as well as providing incentives or establishing a mandate that would ensure all new and modified properties have these “visitable” qualities.

Thank you for your time and consideration!
Allison Bracken

Cox 1

May 13, 2015

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
and
Indiana Office of Community and Rural Affairs
1 N Capitol Ste 600
Indianapolis, I 46204-2288
Attn: Ms. Corrie Scott

Dear Mr. Sipe and Ms. Scott,

I would like to thank you for the opportunity to comment on the Consolidated Plan, 2015 Action Plan. I work at ATTIC, an independent living center based in Knox county which provides services to 8 counties in southern Indiana, as well as being a committee member for the Back Home Indiana Alliance . In working with persons with disabilities and their housing issues, there are concerns needing to be addressed regarding availability of integrated, affordable and accessible housing for persons with disabilities and senior citizens also. This could be improved with through increased opportunities to rent and purchase a home, and with increased home modification initiatives.

1. 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 IHCD Section Housing Choice Voucher program.

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

2. Increase the availability of integrated, affordable and accessible housing for people with SSI incomes or lower who live in the community and are not institutionalized. I would also include those who are renting.

Good quality market rental housing is often not affordable for persons with SSI incomes , not only in Indiana but across the United States. Low income housing tax credit properties, one of the fastest growing options for affordable housing over the past decade, have been largely unaffordable for those with SSI incomes, people with disabilities tend to be “ priced out” of this housing market. We must use the Con Plan, Section 8 and Continuum of Care related resources to increase rental subsidies. Partnerships with public housing authorities and any 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 help assure that those with very low incomes receive a fair share of all affordable housing units.

3. Assist individual jurisdictions to adopt *visitability* ordinances that mandate basic access in all new housing (single family homes, townhouses) not yet covered by current law or policy (with the exemption from zero-step entrance where topographical features make them unfeasible.)

Basic access features are defined in 2009 ICC A117.1 Accessible and Useable Buildings and Facilities.

IHCDA needs to establish policies that provide a "threshold requirement" for federally funded housing developers to build new housing that provides basic access or visitability standards.

Opportunities should be enhanced for the education of architects, designers, developers and builders of single family housing and town homes on accessibility requirements to meet visitability standards. Visitability features are slowly being incorporated in new construction by non-profit organizations, it remains unclear what standards will be used at this time. A concerted effort to educate professionals on visitability standards as defined by 2009 ICC A117.1 is needed and would be helpful in creating uniformity needed to assure basic access, as intended.

4. 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 I 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.

5. ALL new federally financed Section 504 accessible and affordable housing needs to be *affordable* for those with SSI incomes (<20% Area Median Income) .

All existing accessible federally funded housing should be made affordable for those with SSI incomes, including units developed through the Low Income Housing Tax Credit program(LIHTC). Although LIHTC is not included in the Con Plan allocation of funds, it has been one of the fastest growing affordable in our state. Where as improvements in the affordability of the units at the 30% or less AMI is evident when solid planning is completed with community disability related organizations, a designation of units being affordable at the 18% or below would help assure access for all who qualify and apply.

The IHCDA is to be commended for the incentives in the Qualified Allocation Plan that should encourage developers to increase the percentage of the number of section 504 accessible units. The response has been very positive, and it is recommended that these incentives not only be maintained, but also strengthened by the provision of rental subsidies or affordability standards for those units.

6. Increase the availability of home modifications funds for people with disabilities and older adults to assure housing stability and safety. Home modifications funds need to be available for both homeowners and renters.

We have seen a direct need for this evidenced by the consumers we work with who are transitioning out of nursing homes. Their families are being told that their loved one cannot be released back to their home until certain home modifications have been made to ensure their safety at home. These modifications are often very expensive and there are not enough programs to assist with funding the necessary modifications. While there is the Owner Occupied Rehab program, funding home modifications, these funds are used mainly for major improvements and renovations such as roofs and furnace repair. These expensive repairs often leave no resources for desperately needed home modifications in areas such as bathrooms or hallways .

By 2040, 1 in 5 Hoosiers will be 65 or older, currently there are about 1 million Hoosiers age 60 or older. Older Hoosiers consistently express a desire to age in place, although when polled many did not feel confident they would be able to afford to do so.

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

In some instances, home ownership may be the best (or only) option for a person needing accessible housing, in order to mitigate the impact of their disability. As an example, for a person with a disability renting a pre-existing apartment is not possible due to environmental reasons. Those with Section 8 Housing Choice Vouchers could create a permanent home with access to the mortgage program.

8. 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're hoping to see a shift in the proposed budget for the coming year to address the critical affordability housing needs identified and the expanding need for existing and new housing that can be used by all Indiana citizens

Thank you for this opportunity to address issues and your continued leadership.

Sincerely,

Cindy Cox
Member Back Home Indiana Alliance/ Attic Inc.

Cox 4

Scott, Corrie

From: Cindy Cox [cindy@atticin.org]
Sent: Wednesday, May 13, 2015 1:42 PM
To: Scott, Corrie
Subject: Con Plan 2015
Attachments: Con Plan May 2015.docx

Daly 1

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 3:04 PM
To: 'Morgan Galloway Daly'; Sipe, Jacob
Subject: RE: Indiana Consolidated Plan -Public Comment

Dear Ms. Daly,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Morgan Galloway Daly [<mailto:mgallowaydaly@gmail.com>]
Sent: Wednesday, May 13, 2015 1:35 PM
To: Sipe, Jacob; Scott, Corrie
Subject: Indiana Consolidated Plan -Public Comment

Dear Ms. Scott and Mr. Sipe,

I would first like to thank you, IHCDA, and OCRA for the opportunity to comment on the Consolidated Plan. The text below outlines my recommendations pertaining to the remaining HOME TBRA funds, Section 8 Housing Choice Vouchers, home modifications, and visitability; this is in relation to affordable and accessible housing.

Remaining HOME TBRA funding:

- Allocate the remaining HOME TBRA dollars specifically for people with disabilities. The limited availability of affordable and accessible housing affects all of our impoverished populations, but even more so those living with disabilities, as they are likely to encounter complex housing problems in terms of affordability AND accessibility. Using these remaining funds for assistance for people with disabilities would be a beneficial action in **“reduce(ing) homelessness and continued institutionalization of people with disabilities”**.

Section 8 Housing Choice Vouchers:

Ody 2

- **Continue the commitment to deinstitutionalization** of our aging and disability populations through access to housing vouchers and the Indiana Money Follows the Person program. This allows people to integrate back into their communities through affordable and accessible options.
- Further, make vouchers available to those not affiliated with the Indiana Money Follows the Person program and available for all people living in institutions with access to community supports and services.
- In some instances home ownership is the **ONLY** option for people who need accessible and/or specific housing accommodations. Reinstating the Section 8 Homeownership Program within the IHCDA would allow those in need to purchase homes.

Home Modifications:

- People looking to “age in place” are often in need of home modifications due to the onset of a temporary or permanent disability. IHCDA funds need to be made available for home modifications that **allow for people to remain in their homes instead of being forced into institutional settings.**
- Home modifications should include but not be limited to building ramps. Accessible doorways and bathrooms are examples of additional needs that many of our aging seniors and people with disabilities are in need of. Major structural modifications and repairs, such as new furnaces and roofs, are also necessary for people to remain in their home. The IHCDA needs to also allocate funding to these types of modifications.
- In addition, these funds should be available to both renters and home owners alike. People who rent are often unable to purchase a home and when their residence becomes inaccessible they too, are forced into institutional settings

Visitability:

- Support the creation of visitability ordinances, mandating that ALL new single family, town homes, duplexes, and triplexes be built to visitable standards. Visitability allows for our seniors to age in place and maintain their quality of life. This creates fair and equal access for all people, with and without disabilities, to purchase homes, visit friends/families’ homes, and increase their quality of life.
- Continue to expand upon the current incentives for HOME and LIHTC funding to develop visitable features in new construction.

Affordable Housing:

- People with disabilities/receiving a fixed SSI income are unable to afford Section 504 accessible housing. ALL of these new properties should be made affordable for people with limited, lowest incomes.
- This is not just a Section 504 issue, as there is simply not enough affordable and accessible housing for those who fall into the <20% area median income. These needs to be more <20% area median income units made available.

Thank you again for the opportunity to comment and give recommendations concerning the Consolidated Plan. I appreciate IHCDA and your efforts in improving affordable and accessible housing for all Hoosiers, specifically our aging and disability populations.

I would be happy to answer any questions regarding my comments above.

Sincerely,

Morgan Daly

mgallowaydaly@gmail.com

219-510-2097

Daly 3

Newlin 1

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 3:16 PM
To: 'sicol-deb'
Cc: Chris Spinks; Al Tolbert; dlmccart1@aol.com
Subject: RE: Consolidated Plan

Dear Ms. Newlin,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: sicol-deb [<mailto:sicol-deb@hpcisp.com>]
Sent: Wednesday, May 13, 2015 2:50 PM
To: Scott, Corrie
Cc: Chris Spinks; Al Tolbert; dlmccart1@aol.com
Subject: Consolidated Plan

Dear Ms. Scott,

I have attached my Consolidated Plan comment letter to this email.

I thank-you for your time.

Sincerely,

Deb Newlin

Southern Indiana Center for Independent Living (SICIL)

Crawford County Outreach Coordinator

deb@sicilindiana.org

812-653-7366

Newlin 2

NEWLIN 1

May 13, 2015

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

Dear Ms Corrie Scott,

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

I attended the "Back Home in Indiana Alliance," in Indianapolis, on the 15th of April. That is how I first learned about the affordable housing issues. I also attended the Public Hearing on April 23, 2015 at Scottsburg.

I have addressed seven issues dealing with the Indiana Consolidated Plan. I hope that the proposed budget will include more affordable visitability housing complexes be built, an increase in funds for home modifications/repairs for home owners, more funds made available for home modifications/repairs for renters, more money available for mobile home dwellers and their problems, more Section 8 vouchers made available, the Section 8 Homeownership Program be reinstated, and places for homeless shelters to be bought or built in county's where there presently is not one.

I feel that all counties should have an affordable visitability housing complex within their borders. Knowing that the disabled or senior resident can maneuver in and out of their home, as well as around inside of their home is a great accomplishment. It is also good to know that any person visiting them with any type of disability can also maneuver just as well. I recommend that all counties have a goal of at least one neighborhood like this.

While it would be nice to have an affordable visitability housing complex built in my county, accessibility is a need that we have now. I think that there should be an increase in funds for a home so that the middle aged of today is able to stay in their home as a senior. Things like kitchen and bathroom modifications, as well as roof repairs and mold clean-up can/are expensive. Anyone that is getting SSI or on a fixed income, like Social Security, do not have funds available to tackle these types of necessities.

Since I live in a predominantly rural and low income area, most of my consumers live in rental properties. While it should be the landlord's responsibility to maintain the up-keep for their properties, most owners do nothing but collect the rent. Things like leaky roofs, broken windows, sagging floors, and mold are some of the problems my consumers face on a day-to-day basis. Anyone that is getting SSI or on a fixed income, like Social Security, do not have funds available to pack-up and move if improvements are not made. Because of this, I would like to see more funds made available for this group of people.

While some of my consumers rent and live in stick homes, most of the rental properties are mobile homes. Whether it is owned or rented, there needs to be more money available for mobile home dwellers. Leaky roofs are harder to repair, because water paths are not easily found. Mold issues are more rampant, because most of the homes are not set on top of a concrete pad. Even those that are on concrete are prone to mold issues. I recommend that more funds be made available to this type of dweller.

Crawford County is in dire need of affordable housing. While there are a few apartment complexes throughout the county designated for the disabled and senior citizens, affordability is an issue. Since Section 8 vouchers are almost impossible to get in Crawford County, some of these apartments set empty. I would like to see more Section 8 vouchers become available in my county.

I have learned that there used to be a Section 8 Homeownership Program, but that it was discontinued by the IHADA. I want to recommend that this program be reinstated. Home ownership is the best and sometimes only option for a person that needs accessible housing. The problem is that most SSI consumers have no way to build good credit ratings. Without a good credit rating a bank will not loan anyone money. By reinstating the Section 8 Homeownership Program fewer consumers will have to depend on landlords to get their accessibility needs met.

I know that one of HUD's basic goals is to provide decent housing that includes assisting homeless people. My county is a poor rural district. 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.

I have listed seven main areas that my county needs help in obtaining to better the life of the disabled and senior community. I think that all seven needs are issues that most all counties have. I hope that you consider all the points that I have made valuable.

I want to thank-you for your time.

Sincerely,

Deb Newlin
Southern Indiana Center for Independent Living (SICIL)
Crawford County Outreach Coordinator
deb@sicilindiana.org
812-653-7366

Mills 1

Scott, Corrie

From: Joe Mills [jemills@morgancountyhabitat.org]
Sent: Tuesday, April 28, 2015 2:45 PM
To: Scott, Corrie
Subject: Consolidate Plan
Attachments: Consolidated Plan input.docx

Please accept my comments on the State's Consolidated Plan.

Joe Mills

Mills 2

April 21, 2015

2015-2019 Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

To whom it may concern:

Please consider the following input in response to your draft 2015-2019 Consolidated Plan:

1. With respect to housing conditions and poverty, it is laudable to provide affordable rental housing to under-resourced families as a safety-net initiative. But I can find no credible data that suggests that provision of affordable rental housing contributes to a family rising from poverty. In contrast, HUD's "Evidence Matters, Paths to Homeownership for Low-Income and Minority Households" states:
 - a. Homeownership contributes to financial security and stability by offering homeowners protection from rising housing costs, increased savings and purchasing power, the ability to borrow against the equity of the home, and the opportunity to refinance at lower interest rates;
 - b. Financial gain is not the only reason a majority of American households aspire to own a home; social benefits are also associated with homeownership. In a recently released National Housing Survey sponsored by Fannie Mae, the most cited reasons for wanting to own a home were to have a good place to raise children, a safe place to live, more space for family, and control over one's living space. Herbert and Belsky found that the nonfinancial benefits associated with homeownership, which have been linked to better physical and psychological health, are evident but not assured. Some of these benefits pertain to greater satisfaction — with life, one's home, and one's neighborhood;

- c. Other positive effects identified with homeownership include improved outcomes for children.

It is recommended that home ownership opportunities be expanded through the HOME and CDBG programs.

2. In section MA-20 Condition of Housing, Need for owner and Rental Rehabilitation, the poor conditions of rental housing will not be materially impacted by continual government-financed rehabs.

It is recommended that IHCD beef up expectations for on-going maintenance by landlords and monitor more closely rental developments supported by HOME funds.

3. In section SP-05 Strategic Plan Overview, there is not one mention of home ownership initiatives.

It is recommended that IHCD stop giving lip service to home ownership and address it substantively, backing it with resources.

4. In section SP-25 Housing Priority Needs, homeowner housing is narrowly defined as “visitable” and for those aging in place. While it is commendable that IHCD recognizes the special housing needs of persons with disabilities and the aging populations, it is puzzling as to why these populations are only mentioned with respect to homebuyer housing.

It is recommended that resources made available for homebuyer projects not be narrowly designated for special populations at a rate higher than for rental projects.

The inclusion of “green building” as a priority housing need is dubious. I applaud the emphasis on energy efficiency, but such standards such as the NAHB green standards include far too many non-essential and costly features.

It is recommended that the larger focus be on energy efficiency, not “green.”

I fail to see the relevance of “projects that utilize minority-owned, women owned and disadvantaged business enterprises” as a Housing Priority Need.

It is recommended that IHCD not confuse “need” with regulations and guidance.

5. On page 76, the HOME match requirement is 25%.

It is recommended that each and every HOME project be required to produce the 25% match. The practice of using match from previously-funded programs should cease.

6. On page 80, the HOME allocation of \$1,000,000 to “owner occupied housing” states that 125 household housing units will be added. That amounts to \$8,000 per unit. It is

apparent that IHCDCA does not intend to support newly constructed units and instead plans to allocate these funds to “preserving” existing owner housing stock.

It is recommended that additional HOME funds be assigned to home ownership housing for adding housing stock.

7. In section SP-70, there is an attempt to say that, in spite of a formal state anti-poverty strategy, this plan addresses that issue. The verbiage is not impressive. It is best to say nothing when you have nothing of substance to say. There is no empirical evidence that the mainstay strategy of IHCDCA’s affordable housing plan, provision of affordable rental housing, has any correlation with families rising from poverty.

It is recommended that the State of Indiana embrace “Bridges out of Poverty” (modeled in Indiana in South Bend, Morgan County, and Putnam County) and then create housing strategies that are integrated into local needs as opposed to state priorities.

8. In the discussion of IHCDCA’s application for funding processes, narrowly mis-titled, “IHCDCA HOME 2015 FY Rental Policy, March 2015”, it is stated that “Rental and homebuyer developments will compete in the same round....” But on page 80, in the presentation of proposed uses of HOME funds, #10 homeowner housing under the column “funding”, in contrast to #9, rental developments, contains no language pertaining to competitive rounds.

It is recommended that competitive rounds of funding be used for homebuyer projects, with an increase in the funds available for such projects.

It is recommended that in the scoring protocol for homebuyer projects, that only criteria that are specific to homebuyer projects be used and that all references to rental development be excluded. Example: Development Features 3) Design Features, “playground and community room.” Another example: 8.4 Capacity 2) Certifications. Only those certifications germane to homebuyer projects be included

It is recommended that IHCDCA review the points attributed to the various services in Project Characteristics 4/ Services and with assistance from homebuyer developers, re-assign values that are more appropriate for homebuyer clients.

It is recommended that homebuyer project scoring criteria be re-evaluated to insure that every applicant, regardless of the type of project, has an equal opportunity to score the same number of points as other applicants. As one example, because developers of new construction housing cannot score points in 8.2 Development Features 1) Existing Structures, there should either be another scoring opportunity not available to developers utilizing existing structures, or the point threshold modified to eliminate the unfairness.

Mills 5

It is recommended that the definition of infill be re-worked to eliminate the unfair advantage of developments in cities and towns. It is further recommended that the scoring duplication of "returning vitality to the neighborhood" be eliminated in 8.2 Development Features sections 2) and 3).

It is recommended that in 8.2 Development Features, 6) Green Building, that Touchstone Energy be recognized as being comparable to Energy Star. See previous discussion of the NAHB & LEED as being over-kill and not necessary or even desirable for most affordable housing developments. Focus on energy saving features for the homebuyer.

It is recommended that in 8.5 Financing, Public Participation and 2) Leveraging of other Sources, the standards be raised for scoring points. 5% is an embarrassing goal for the maximum points. Recommended are:

1% - 4.99%	1
5% - 9.99	2
10% - 14.99%	3
15% - 19.99%	4
20% and over	5

It is recommended that points for 8.6 Unique Features 1) be eliminated. In a scoring protocol that demands a fixed minimum scoring threshold, an entirely undefined and subjective scoring category such as this is rife with opportunity for agency, even staff bias.

I stand ready to discuss these issues further and offer my time and resources to assist IHEDA in making changes in these areas.

Sincerely,

Joseph Mills

Pukhiser 1

Scott, Corrie

From: Scott, Corrie
Sent: Thursday, May 07, 2015 3:46 PM
To: 'sicol-ralph'
Subject: Correction Indiana Consolidated Plan

Mr. Pukhiser,

Please forgive me for indicating that your comment was received after the comment period. I am wrong about that – the comment period ends next week on May 13 so it arrived in plenty of time and will be reviewed and considered as we continue this process and submit the 2015 Consolidated Plan to the U.S. Department of Housing and Urban Development.

I hope my earlier email did not inconvenience you! Please feel free to contact our office should you have any questions.

Sincerely,

Corrie
Corrie K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: Scott, Corrie
Sent: Thursday, May 07, 2015 3:32 PM
To: 'sicol-ralph'
Subject: RE: Indiana Consolidated Plan

Dear Mr. Purkhiser,

Thank you for expressing your interest in the 2015 Consolidated 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 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

Purkhiser 2

From: sicil-ralph [mailto:sicil-ralph@hpcisp.com]
Sent: Thursday, May 07, 2015 3:19 PM
To: Scott, Corrie
Cc: Chris Spinks
Subject: Indiana Consolidated Plan

Dear Ms. Scott:

I am the Range County Outreach Coordinator for the Southern Indiana Center for Independent Living. While recent years have seen some great improvements in Orange County, affordable, accessible housing remains a great concern. I hope the Indiana Consolidated Plan will address these issues.

In my position, I have been active in getting ramps built for persons with disabilities. We have built several ramps using volunteer labor and paying for the materials with private grants and donations. Last year, volunteers built a ramp for a woman who had not been out of her house for a year because there was not accessible entrance. It was wonderful to watch her wheel out onto the new deck and get into a car at the end of the ramp. I therefore applaud the Ramp-up program in the plan, making funds available for ramp projects. However, a ramp is only the first step in making a home accessible. In the case cited above, we had to make some improvements to doorways and thresholds in the house to allow her electric wheelchair to pass through. Bathrooms and kitchens also often need to be modified for accessibility. Funds for such modifications need to be included in the plan. There is also a great need for money to fund major repairs, including roofs and mold issues. This would enable many elderly people and people with disabilities to continue living in their homes

Orange County also has a great need for the construction of new affordable, accessible housing. I would support a rule that all housing built with state and federal dollars be visitable. There is a great need here for affordable rentals, especially units that are accessible to persons with disabilities. At present, the only time there are openings in our existing housing for seniors and persons with disabilities is when someone either dies or goes to a nursing home. Waiting lists are long and meanwhile, people are living in sub-standard housing or paying so much for rent that they are unable to pay for other life necessities.

I urge you to keep the Section 8 voucher program. Without this program, it would be nearly impossible for a person living in an institution to return to community living. This is a priority for the Centers for Independent Living. I also urge participation in the 8-11 program.

While I realize that funds are limited, I hope that the plan will give the greatest consideration to those who are most in need of help. Persons of advanced age and others with disabilities need to be at the forefront of consideration in writing the Consolidated Indiana Plan.

Sincerely,

Ralph Purkhiser, SICIL Orange County COC

O'Haver 1

Scott, Corrie

From: Amber O' Haver [aohaver@abilityindiana.org]
Sent: Friday, May 08, 2015 7:17 PM
To: Scott, Corrie
Cc: Sipe, Jacob
Subject: Indiana Consolidated Plan - Public Comment

Importance: High

Dear Ms. Scott & Mr. Sipe,

accessABILITY, Center for Independent Living would like to thank you and IHCD and OCRA for the opportunity to comment on the Consolidated Plan. The following discusses our organization's concerns and recommendations regarding integrated, accessible, affordable housing for people with disabilities and older adults, particularly those that fall into the category of 30% or less of AMI while **addressing the Con Plan's Goals to "reduce homelessness and increase housing stability for special needs populations" & "Promote livable communities..."**

Concern #1: Utilize rental subsidy dollars specifically for people with disabilities (outside of HIV/Aids population) with HOME TBRA funds.

STRONGLY Recommend #1: People with disabilities are one of the most impoverished minority populations that often have to address far more housing-related (and other types of) barriers than other groups. Because of these additional barriers, a lot of people with disabilities are often forced into an institutional setting just to get their basic needs met. To reduce homelessness and continued institutionalization of people with disabilities, the following is recommended:

- Allocate the remaining HOME TBRA program funds (from FY 2013 & 2014) specifically for assisting people with disabilities with rental deposits, rental application fees, up to first 6 months worth of rental payments, and possible payment of back rent & utilities to eliminate cumbersome, challenging barriers to securing housing.

Concern # 2: Increase the Availability of Home Modification Funds for Homeowners and Renters

Recommendation # 1: Increase the availability of home modification funds for people with disabilities and older adults to assure housing stability and safety. Home modification funds need to be available for both homeowners and renters.

Indiana Housing and Community Development Authority (IHCD) funds for home repair and accessibility modifications are predominantly for major home repairs such as new roofs, furnaces, etc. Given the high cost of these home repairs, little to no funds are available to address the accessibility of entrances, bathrooms, etc. for those wanting to "age in place."

Concern #2: Maintain the Section 8 Housing Choice Voucher Preference for Persons Living in Institutions (e.g., nursing homes, state hospitals).

Recommendation # 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 and accessible housing through the IHCD Section 8 Housing Choice Voucher program

Concern #3: People with Disabilities and SSI Income Cannot Afford an Apartment or Efficiency in Indiana.

O'Haver 2

Recommendation #3: Increase the availability of integrated, affordable and accessible housing for people with SSI incomes or lower who live in the community and are not institutionalized.

Concern #4: New Single Family Housing and Town Homes Are Being Built That Shut Out People with Disabilities and Seniors.

Recommendation #4: Assist individual jurisdictions to adopt *visitability* ordinances that mandate basic access in all new housing (e.g., single family home, townhouse) not yet covered by current law or policy (with exemption from the zero-step entrance where topographical features make that unfeasible).

IHCDA needs to establish at minimum policies that provide a *threshold requirement* for federally financed housing developers to construct new housing with basic access or visitability standards, building upon the existing incentives when HOME funds are used.

Concern #5: People with Disabilities are priced out of Section 504 accessible housing units

Recommendation #5: ALL new federally financed Section 504 accessible and affordable housing needs to be *affordable* for those with SSI incomes (<20% Area Median Income).

Concern # 6: The Section 8 Homeownership Program was discontinued by IHCDA.

Recommendation #6: Re-establish the Section 8 Homeownership Program within the IHCDA Single Family Housing Department.

In some instances, home ownership is the best (or only option) for a person who needs accessible housing or who requires specific types of locations (e.g., avoid spraying of corn fields) and the use of specific building materials construction, such as those living with Multiple Chemical Sensitivities. Those with Section 8 Housing Choice Vouchers could create a permanent home with access to the mortgage program.

Again, thank you for the opportunity to provide input into the Indiana Consolidated Plan and for your attention to accessABILITY's concerns & recommendations for the Con Plan.

Please feel free to contact me for further comment or questions.

Best,

Amber O'Haver
Deputy Director
accessABILITY, Center for Independent Living
5302 E Washington St
Indianapolis IN 46219
317-926-1660 Ext 247
aohaver@abilityindiana.org
www.abilityindiana.org

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O'Haver 3

"Be the Change You Wish To See In The World..." - Gandhi



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Taylor 1

Scott, Corrie

From: Traci Taylor [tracit@ilcein.org]
Sent: Friday, May 08, 2015 7:01 PM
To: Sipe, Jacob; Scott, Corrie
Cc: dlmccart1@aol.com; Ann Barnhart; swordsman90@hotmail.com; mickeynerd82@gmail.com
Subject: Feedback on the 2015 Consolidated Plan
Attachments: Feedback on 2015 Consolidated Plan.docx

Hello,
Here is my feedback on the 2015 Consolidated Plan.
Thank you,
Traci

Traci Taylor
Director of Independent Living Services
Independent Living Center of Eastern Indiana
1818 West Main Street
Richmond, Indiana
-47374-
(765) 939-9226 Ext 102

Taylor 2

May 8, 2015

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov
and
Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2288
Attn. Ms. Corrie Scott
coscott@ocra.in.gov.

Dear Mr. Sipe and Ms. Scott,

I would like to thank you and IHCDA and OCRA for the opportunity to comment on the Consolidated Plan, 2015 Action Plan. As a person with disability who is renting a home in Indiana and works with others with disabilities, my primary concern is the pressing need for an increase in the availability of integrated, affordable and accessible housing for people with disabilities and older adults. This can be achieved through rental and homeownership opportunities, as well as home modification initiatives. The following are recommendations for the 2015 Action Plan.

1. 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 and accessible housing through the IHCDA Section 8 Housing Choice Voucher program.

Thank you Mr. Sipe and IHCDA for continuing to provide national leadership in the deinstitutionalization movement and in the implementation of the Olmstead decision through the allocation of these housing vouchers. I am proud to be associated with such leadership.

2. Increase the availability of integrated, affordable and accessible housing for people with SSI incomes or lower who live in the community and are not institutionalized. I believe that this should include those who are renting. 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, the fastest growing affordable housing over the past decade, has been largely unaffordable for those with SSI incomes – people with disabilities are “priced out” of this housing market. We must use ConPlan, Section 8 and Continuum of Care related resources 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 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 see: www.tacinc.org Click on Publications.

3. Assist individual jurisdictions to adopt visitability ordinances that mandate basic access in all new housing (e.g., single family home, townhouse) not yet covered by current law or policy (with exemption from the zero-step entrance where topographical features make that unfeasible). Basic access features are defined in 2009 ICC A117.1, Accessible and Useable Buildings and Facilities.

IHCDA needs to establish, at minimum, policies that provide a *threshold requirement* for federally financed housing developers to construct new housing with basic access or visitability standards. The state of Oregon, Chicago and Urbana, IL and Austin, TX have all passed ordinances that mandated visitability features in single-family housing paid for with public funds.

It is recommended that opportunities be enhanced for the education of architects, designers, developers and builders of single-family housing and town homes on accessibility requirements to meet visitability standards. Visitability features are slowly being incorporated in new construction by non-profit organizations, however it is unclear exactly what standards will be used. A concerted effort to educate professionals on visitability standards as defined by 2009 ICC A117.1 is needed and will help to create the uniformity needed to assure basic access, as intended.

4. 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 demonstrated a high percentage of multi-family housing in Central Indiana was found to be non-compliant with the Fair Housing Accessibility Standards. It can be assumed that properties throughout Indiana may also have similar compliance issues.

5. ALL new federally financed Section 504 accessible and affordable housing needs to be *affordable* for those with SSI incomes (<20% Area Median Income). All existing accessible federally funded housing needs to be made affordable for those with SSI incomes, including units developed through the Low Income Housing Tax Credit program (LIHTC). Although LIHTC is not included in the ConPlan allocation of funds, it has been the fastest growing affordable housing in the state. Where as improvements in the affordability of these units at the 30% or less AMI is evident when solid planning is completed with community disability related organizations, a designation of units being affordable at the 18 % or below would assure access for all who qualify and apply.

Taylor 4

The IHCD is to be commended for the incentives in the Qualified Allocation Plan that encourage developers to increase the percentage of the number of Section 504 accessible units. The response has been very positive. It is recommended that these incentives not only be maintained but, also strengthened by the provision of rental subsidies or affordability standards for these units.

6. Increase the availability of home modification funds for people with disabilities and older adults to assure housing stability and safety. Home modification funds need to be available for both homeowners and renters.

I have seen direct need for this as evidenced by the Consumers I work with who are transitioning out of nursing homes. Their families are told that their loved one will not be released back to their home until certain home modifications have been made to ensure their safety in their home. These modifications are often very costly and there are not programs to assist with funding the necessary modifications. While we are aware that there are Owner Occupied Rehab. funds for home modifications, these funds are most often used for major improvements and renovations such as roofs and furnace repair. These costly repairs often leave no resources for the desperately needed home modifications in areas such as bathrooms and hallways.

By 2040, 1 in 5 Hoosiers will be 65 or older. Currently there are about 1 million Hoosiers age 60 and older. Older Hoosiers have consistently expressed a desire to age in place. When asked 94% of older Hoosiers would like to remain in their current residence as long as possible, unfortunately 39% are not very confident they will be able to afford to do so. (Source: Dr. Phil Stafford. 2008 Indiana AdvantAge Initiative survey results. For a complete report see website: www.agingindiana.org).

There are 44,030 Indiana renters with mobility and self-care limitations, including those 62 and older, whose household incomes are less than 30% of the AMI. (Source: 2000 CHAS Data Book) Home modification funds through IHCD are currently restricted for use to homeowners. Those who rent and need to make internal modifications to the unit do not have access to HOME or CDBG funds to help with the cost. Making internal modifications remains the renter's expense for those who are unable to locate a suitable rental unit in the community.

The reference to the use of home modification funds towards rental housing in the ConPlan related survey is appreciated and indicates a first step towards better understanding this need. Many persons with disabilities are unable to afford to buy a home.

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

In some instances, home ownership is the best (or only option) for a person who needs accessible housing. In order to mitigate the impact of their disability. For example some persons with a disability, renting a pre-existing apartment is not feasible due to environmental reasons. Those

Taylor 5

with Section 8 Housing Choice Vouchers could create a permanent home with access to the mortgage program.

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

I would like to see this program re-established. There are a growing number of people with disabilities who unable to live in rental properties due to a lack of accessible of units. I also would like to see it become a threshold requirement that non-profit organizations like Habitat for Humanity be required to accept section 8 vouchers for the down payment. This would increase affordability and increase families served by Habitat for Humanity as well.

We hope to see a shift in the proposed budget for the coming year to address both the critical affordability housing needs identified and the growing need for existing and new housing that can be used by all of Indiana's citizens.

Thank you for this opportunity and for your continued leadership.

Sincerely,

Traci Taylor
Member of the Back Home in Indiana Alliance
tracit@ilcein.org
(765) 993-3603

Shannon 1

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 3:31 PM
To: 'Shannon@pprgrant.com'
Subject: Consolidated Plan

Dear Shannon,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

Scott, Corrie

Shannon 19
Comments in red

From: Weissenberger, Kathleen A.
Sent: Wednesday, May 13, 2015 7:38 AM
To: Scott, Corrie
Subject: FW: Fwd: ConPlan Comments

Kathleen Weissenberger | State CDBG Director
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.232.1703 | ocra.IN.gov



Please consider the environment before printing this e-mail.

From: Shannon [<mailto:Shannon@pprgrant.com>]
Sent: Wednesday, May 13, 2015 12:07 AM
To: Weissenberger, Kathleen A.
Subject: Fwd: Fwd: ConPlan Comments

Kathleen:

See comments below:

----- Forwarded message -----

From: "Weissenberger, Kathleen A." <kweissenberger@ocra.in.gov>
Date: May 7, 2015 12:41 PM
Subject: ConPlan Comments
To: "jsaegesser@riverhills.cc" <jsaegesser@riverhills.cc>, "Debbie Bennett-Stearsman" <DBennett@southwestindiana.org>, "lisa@ind15rpc.org" <lisa@ind15rpc.org>, "susan.craig@sirpc.org" <susan.craig@sirpc.org>, "greg@beumerconsulting.com" <greg@beumerconsulting.com>, "gejones@sidc.cc" <gejones@sidc.cc>, "Edwin Buswell" <elb@kirpc.net>, "kristi@sturtzpmg.com" <kristi@sturtzpmg.com>, "kchristlieb@region3a.org" <kchristlieb@region3a.org>, "Shannon" <Shannon@pprgrant.com>, "Amy Miller" <cornerstonegrants@gmail.com>
Cc:

All,

Several of you have commented to me in anecdotal ways that your communities would like the following changes made to the CDBG program. There may have been others but these seem to be the most common I hear.

- Increase the maximum grant amount for the WDW, MSRP, PFP, SIP and particularly BCP.

Given the funding received from HUD has dropped tremendously in recent years, I can understand why OCRA dropped the maximum grant award amounts. However, in my opinion, lowering the maximum amount of grant with the incorporated LMI tiered system on the WDW projects has forced my communities to seriously reconsider whether or not to even apply for funding.

When you have a project that is over \$1 million, which unfortunately the vast majority are, the impact a \$400,000 grant has on the user rate doesn't hit your \$5.00 benchmark. In turn, the communities can't get the points they need to be competitive. To compensate, some of the communities are breaking the overall project down into phases; which makes acquiring the local match more confusing and less cost effective in the long-run for the communities.

When the maximum grant amount was \$600,000 - I thought that needed to be raised in order to really make an impact - now that it is even lower, I have a hard time convincing myself, let alone, my communities to move forward. If they need a lot of grant money to make it work, I think it is in their best interest to go USDA 100%. Especially when, USDA is telling them, we'll give you a grant but if you go to OCRA, we're going to lower the amount of grant we give to you. So in essence, it is kind of a wash.

My opinion is . . . if a community qualifies for a USDA grant - you guys should pass on funding it. Save your grant funds for SRF and / or USDA LOAN ONLY projects and raise the grant amount to the extent it buys down the user rate by \$5.00.

I think the MSRP and PFP maximum grant amount should be \$400,000 - \$500,000. Either/or - makes an impact.

SIP - that one should be \$600,000 because no one else will provide grant assistance for storm and those infrastructure projects cost as much as WDW projects.

BCP - I disagree. I think \$150,000 is more than enough for a straight clearance project. When it gets sticky is . . . asbestos removal. Right now, I have a project that to tear the building down and clear the sight would only be \$60,000. Unfortunately, it is riddled with asbestos and to properly mitigate just that portion is \$225,000. I don't really understand what IDEM's partnership is all about if they aren't bringing any money to the table. If it's a straight clearance with little mitigation, \$150,000 is more than enough. But, IDEM needs to bring some funds to the table for projects where the environmental conditions exceed your \$150,000 maximum.

I understand your goal is to try and spread the funds to as many communities as possible, however, I personally would like to see fewer communities get funded with the ones receiving funds - really being able to see the impact.

Additionally, if there is any way to bring back the 2 funding cycles per year - - please do !!! A lot of my communities this year just weren't ready by the first of the year (*because they we're waiting on the other funding agencies to coordinate their issues*) and now have to wait 12 more months to apply. That has been the communities biggest complaint in respect to OCRA. (*Ideally, it would be nice not to have any due date - make them like planning grant request - when you're ready apply - if you guys think its a good project and you have the funds - fund it. If the project bites and / or you don't have the funds - tell them to go back to the drawing board and re-apply in 6 months.*)

- Don't count planning grants toward the maximum allowable CDBG grants at one time.

I think counting them towards the maximum allowable grants at one time is fine. I understand that it takes time to complete a planning study - but, it buys OCRA some time as well to fund other communities. I think the big problem is . . . communities can't get the plan completed before the next available funding round. If we went back to 2 cycles per year and/or a revolving application submission - that would resolve itself.

- Increase number of open grants allowed for Counties.

I would agree. Counties need to be able to have more windows of opportunity - maybe 4 instead of the 3.

- Include incentive for inclusion of green practices into infrastructure (like SRF).

In theory that sounds great. But the green practices increase the total project costs and ultimately, would increase the grant request needed to make an impact.

We need actual written comments (mail, email or fax) if we are to consider these changes. These comments can come from the any individuals, local units of government or organizations but should address the need for the change. I tried to make sure the attendance

The comment period expires May 13th.

Kathleen Weissenberger | State CDBG Director

Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600

Indianapolis, IN 46204

[317.232.1703](tel:317.232.1703) | ocra.IN.gov



 **Please consider the environment before printing this e-mail.**

Spinkes 1

May 6, 2015

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

Dear Ms. Scott:

I am employed by an independent living center and a lifelong resident of Lawrence County. I recently attended the Fair Housing Conference in Indianapolis where I was introduced to the Consolidated Plan and the many housing issues that affect our community. As an advocate and a family member of the aging and disabled, I appreciate the opportunity to comment on the Consolidated Plan

Lawrence County is predominantly a rural county with limited housing options. Then when you factor or low income and accessibility it becomes even more difficult. I come into contact with many individuals that need assistance in finding affordable housing or they are looking for assistance in making necessary repairs to their own homes. These repairs aren't cosmetic they are necessary for accessibility or to make the home habitable. I was very encouraged to see that there are options for funding in the Consolidated Plan.

This is my first time at commenting on this type of document so I will be straight forward.

1. As I stated above it was exciting to see and hear that there is funding in the Consolidated Plan for home modifications and repairs. I was even more encouraged when I read that it applied to home owners and renters who are at the whim of their landlords. Then I noticed that most of these dollars are consumed by major repairs without addressing accessibility modifications. I would like to see a program carved out of this funding and set aside for accessibility modifications for entrances and bathrooms. I have heard of people in our area being in an apartment that they cannot even enter the bathroom or they can't leave and enter their home independently. The allocation of these funds would be a great start to assist many people to be independent and age in place.
2. I would like to thank you for the Ramp It Up program. Where I work, we are already gathering names and information to access this funding for people in our communities. These dollars will provide dignity and independence for many Hoosiers.
3. Increase the availability of accessible, affordable and integrated housing for individuals with SSI income or lower. Currently these individuals are at the mercy of the Section 8 housing list or knowing when public housing applications are being accepted. This

Spinks 2

results in another list. It is surprising the level of homelessness. Sadly the disabled are hit a bit harder than other groups in our society. These housing options should be integrated into the other areas of our communities. We don't want them to be segregated off and end up with a building for the "disabled people" or the "poor people". They should be afforded an opportunity to take some pride in where they live.

4. The transition of capable individuals out of institutional care is vital to not only the individual and community but the state. Individuals living independently in the community save the state thousands of dollars that would be been paid to nursing institutions. This is possible because of the Section 8 Housing Choice Preference and Money Follows the Person. Please hold fast and continue to the commitment to assure that persons with disabilities and older adults living in nursing institutions have access to affordable, integrated and accessible housing.
5. I contacted a friend of mine that works with a builders organization and asked her what Universal Design and Visitability meant to her and her members. Her response was, I don't know but there is a definition here somewhere in the office. This organization didn't know the term aging in place. This tells me that we need much more emphasis on assisting in the adoption of visitability ordinances that mandate basic access in ALL new housing. These design changes benefit everyone, disabled or not.
6. Homeownership. This is the American dream. Many disabled individuals do not have the opportunity to realize this in their lives. They can't afford a down payment. They can't afford a monthly payment. Many disabled individuals have a difficult time trying to rent an apartment and try to make it accessible, if allowed. However, if they could purchase a home and make it accessible they can live there independently, comfortable and have pride in their own home. There are two programs that could be reinstated to accomplish this dream. They are the Section 8 Homeownership Program within the IHEDA Family Housing Department and increased down payment assistance for persons with disabilities and low incomes.

Thank you for the opportunity to express my thoughts. I hope that this information will show the increased need for safe, accessible and affordable existing housing and new housing for all Hoosiers.

Sincerely,

Ms. Chris Spinks

Poole 1

Scott, Corrie

From: Scott, Corrie
Sent: Wednesday, May 13, 2015 9:08 AM
To: 'lisapoole11120'
Subject: RE: Consolidated Plan and Action Plan2015

Dear Ms. Poole,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Please be assured that all comments will be reviewed and considered as we continue this process and submit the 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: lisapoole11120 [mailto:lisapoole11120@frontier.com]
Sent: Tuesday, May 12, 2015 6:08 PM
To: Sipe, Jacob; Scott, Corrie
Subject: Consolidated Plan and Action Plan2015

May 12, 2015

Mr. Jacob Sipe, Executive Director
Indiana Housing & Community Development Authority
jsipe@ihcda.in.gov
and Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2288
Attn. Ms. Corrie Scott
coscott@ocra.in.gov.

Dear Mr. Sipe and Ms.Scott,
I would like to thank you and IHcda and OCRA for the opportunity to comment on the Consolidated Plan, 2015 Action Plan. As a person with disability who is renting a home in Indiana and works with others with disabilities, my primary concern is the pressing need for an increase in the availability of integrated, affordable and accessible housing for people with disabilities and older adults. This can be achieved through rental and

May 12, 2015

Mr. Jacob Sipe, Executive Director

Indiana Housing & Community Development Authority

jsipe@ihcda.in.gov

and Consolidated Plan

Indiana Office of Community and Rural Affairs

One North Capitol – Suite 600

Indianapolis, IN 46204-2288

Attn. Ms. Corrie Scott

coscott@ocra.in.gov.

Dear Mr. Sipe and Ms. Scott,

I would like to thank you and IHCD and OCRA for the opportunity to comment on the Consolidated Plan, 2015 Action Plan. As a person with disability who is renting a home in Indiana and works with others with disabilities, my primary concern is the pressing need for an increase in the availability of integrated, affordable and accessible housing for people with disabilities and older adults. This can be achieved through rental and homeownership opportunities, as well as home modification initiatives. The following are recommendations for the 2015 Action Plan.

1. Assist individual jurisdictions to adopt visitability ordinances that mandate basic access in all new housing (e.g., single family home, townhouse) not yet covered by current law or policy (with exemption from the zero-step entrance where topographical features make that unfeasible). I would like IHCD to establish at minimum policies that provide a *threshold requirement* for federally financed housing developers to construct new housing with basic access or visitability

standards, building upon the existing incentives when HOME funds are used. It is recommended that opportunities be enhanced for the education of architects, designers, developers and builders of single-family housing and town homes on accessibility requirements to meet visitability standards. Visitability features are slowly being incorporated in new construction by non-profit organizations; however it is unclear exactly what standards will be used. A concerted effort to educate professionals on visitability standards as defined by 2009 ICC A117.1 is needed and will help to create the uniformity needed to assure basic access, as intended.

2. 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 IHCD.
3. I would recommend the re-establishment of the Section 8 Homeownership Program within the IHCD Single Family Housing Department. In some instances, home ownership is the best (or only option) for a person who needs accessible housing or who requires specific types of locations (e.g., avoid spraying of corn fields) and the use of specific building materials construction, such as those living with Multiple Chemical Sensitivities. Those with Section 8 Housing Choice Vouchers could create a permanent home with access to the mortgage program.
4. I would like to see an increase in the availability of home modification funds for people with disabilities and older adults to assure housing stability and safety. Home modification funds need to be available for both homeowners and renters. I have seen direct need for this as evidenced by the Consumers I work with who are transitioning out of nursing homes. Their families are told that their loved one will not be released back to their home until certain home modifications have been made to ensure their safety in their home. These modifications are often very costly and there are not programs to assist with funding the necessary modifications. While we are aware that there are Owner Occupied Rehab. funds for home modifications, these funds are most often used for major improvements and renovations such as roofs and furnace repair. These costly repairs often leave no resources for the desperately needed home modifications in areas such as bathrooms and hallways. By 2040, 1 in 5 Hoosiers will be 65 or older. Currently

there are about 1 million Hoosiers age 60 and older. Older Hoosiers have consistently expressed a desire to age in place. When asked 94% of older Hoosiers would like to remain in their current residence as long as possible, unfortunately 39% are not very confident they will be able to afford to do so. (Source: Dr. Phil Stafford. 2008 Indiana AdvantAge Initiative survey results. For a complete report see website: www.agingindiana.org). There are 44,030 Indiana renters with mobility and self-care limitations, including those 62 and older, whose household incomes are less than 30% of the AMI. (Source: 2000 CHAS Data Book) Home modification funds through IHCD are currently restricted for use to homeowners. Those who rent and need to make internal modifications to the unit do not have access to HOME or CDBG funds to help with the cost. Making internal modifications remains the renter's expense for those who are unable to locate a suitable rental unit in the community. The reference to the use of home modification funds towards rental housing in the ConPlan related survey is appreciated and indicates a first step towards better understanding this need. Many persons with disabilities are unable to afford to buy a home.

5. 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 and accessible housing through the IHCD Section 8 Housing Choice Voucher program
6. Increase the availability of integrated, affordable and accessible housing for people with SSI incomes or lower who live in the community and are not institutionalized. I believe that this should include those who are renting. 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, the fastest growing affordable housing over the past decade, has been largely unaffordable for those with SSI incomes – people with disabilities are “priced out” of this housing market. We must use ConPlan, Section 8 and Continuum of Care related resources 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 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 see: www.tacinc.org Click on Publications.

7. ALL new federally financed Section 504 accessible and affordable housing needs to be *affordable* for those with SSI incomes (<20% Area Median Income). All existing accessible federally funded housing needs to be made affordable for those with SSI incomes, including units developed through the Low Income Housing Tax Credit program (LIHTC). Although LIHTC is not included in the ConPlan allocation of funds, it has been the fastest growing affordable housing in the state. Where as improvements in the affordability of these units at the 30% or less AMI is evident when solid planning is completed with community disability related organizations, a designation of units being affordable at the 18 % or below would assure access for all who qualify and apply.

The IHCD is to be commended for the incentives in the Qualified Allocation Plan that encourage developers to increase the percentage of the number of Section 504 accessible units. The response has been very positive. It is recommended that these incentives not only be maintained but also strengthened by the provision of rental subsidies or affordability standards for these units.

8. Re-establish increased down payment assistance for persons with disabilities and low incomes to assure participation in affordable home ownership opportunities. I would like to see this program re-established. There are a growing number of people with disabilities who unable to live in rental properties due to a lack of accessible of units. I also would like to see it become a threshold requirement that non-profit organizations like Habitat for Humanity be required to accept section 8 vouchers for the down payment. This would increase affordability and increase families served by Habitat for Humanity as well.
9. Affordable housing is more likely to be located in higher poverty or lower opportunity areas; which is not safe for anyone, let alone a person who has a disability.

We hope to see a shift in the proposed budget for the coming year to address both the critical affordability housing needs identified and the growing need for existing and new housing that can be used by all of Indiana's citizens.

Thank you for this opportunity and for your continued leadership.

Lisa Poole 5

Sincerely,
Lisa Poole
Project Consultant, Back Home in Indiana Alliance
3904 Newport Ave Apt #11
Fort Wayne, IN 46805
260.482.2868
Lisapoole11120@frontier.com



2820 S. Main Street Road
Vincennes, IN 47591
Fax 812-886-3744
Farm 812-882-4967

Dennis Mouzin
2493 E. Henry Rd.
Cell 812-890-1926
dennismouzin@mouzinbrothers.com

Ed Mouzin
Cell 812-890-1482

Paul Mouzin



a Consolidated Plan

2015-2019 Five-year Consolidated Plan and 2015 Annual Action Plan

Public Hearing, April 23, 2015
PUBLIC COMMENTS

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Name: Dennis Mouzin

I would like to take this time to express my concerns for the need for migrant housing. Produce is becoming a very large part of Indiana's economy and the lack of seasonal workers is putting a terrible strain on the industry. If you would consider put this in your program it would be a huge part in keeping this industry going.

If you would like more information on this contact me at dennismouzin@mouzinbrothers.com

As President of the National Watermelon Association I am very familiar with the need for this housing project.

Thank you
Dennis Mouzin



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Name: Ralph Parkhiser

I would support an increase in the availability of funds for people with disabilities and older citizens for home modifications that will allow them to age in place. Many need modifications to Kitchens, bathrooms and other areas inside their houses. I also believe access to potable water needs to be addressed. In rural areas, many depend on springs & wells. When pumps malfunction, there is a need for funds for pumps or repairs.



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Name: Jo Balthus

Housing for Migrate Farm Workers

I have been around farming industrial
my whole life. The farming community needs
the assistance for Migrant Workers. They
are important part of the farming facilities.
Any financial assistance will help improve
and help the agriculture business.



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Name: Troy McCray

The farming community would like to see money put back into the five-year plan for help with migrant workers housing. With rising prices and more regulations but on the housing, it's getting harder to find places that we can afford. Migrant workers are very important to the agricultural community and we need help with money to properly house them!

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Name: Cindy Mazin

My concern as part of the Agricultural Community is the lack of grant funding available for migrant worker housing. If the questions asked to complete the assessment phase did not include language about migrant worker housing then it would be expected you don't have the necessary information to include them or identify them as a special need. Migrant worker housing is extremely important to this agricultural community. Without the migrant workers we would not be able to grow & produce the seasonal produce that supplies the entire midwest. What do we need to submit as a group to get them identified as a special need? Please advise.

Please keep comments private. Cindy Mazin

Cindymazin @ mazin brothers . com



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Name: Terry Moreland 807 Eisenhower circle Vincennes, IN 47594

I think new rentals need to be bigger as far as
floor space because later in life a persons in a wheel
chair need room to get around in rentals
and public places need to have more blue handicapped
buttons to open doors for wheelchair folks.

Migrants workers need better living conditions
when in field work here in U.S. Need to keep
Vets in mind when build Visibability home they
use large track chair that need space

THANKS



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Name: Terry Moreland

More need to be done about reinstating
Section 8 vouchers, and rentals for handiapped
individuals need to increase in the future
and CEBG monies need to stop going down.
Keep our veterans in mind their are
about 58,000 to 60,000 thanks
Terry

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Name: Terry L Moreland

I would like to see me IHCDA monies
along with CeBG monies applied to
visibility go to these kind of homes
to make it easy to get amount, and some monies
to go migrant workers to build better homes
when they come and work the fields in summer
time. Also to keep in mind new and rentals
homes for the handipied their need to be more
floor space in some cases and more new places
need to be built in the near future.
Thanks and let's keep our wounded vets
in mind their are about 58,000 of them
Thanks

Scott, Corrie

From: Scott, Corrie
Sent: Thursday, May 14, 2015 8:57 AM
To: 'apalmer1900@aol.com'
Subject: Consolidated Plan

Dear Anne,

Thank you for expressing your interest in the 2015 Consolidated 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 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: apalmer1900@aol.com [mailto:apalmer1900@aol.com]
Sent: Wednesday, May 13, 2015 8:51 PM
To: Sipe, Jacob; Scott, Corrie
Subject: consolidated plan

I would like to ask IHCD, and OCRA for the opportunity to comment on the Consolidated Plan. The text below outlines my recommendations pertaining to the remaining HOME TBRA funds, Section 8 Housing Choice Vouchers, home modifications, and visitability; this is in relation to affordable and accessible housing.

Remaining HOME TBRA funding:

- Allocate the remaining HOME TBRA dollars specifically for people with disabilities. The limited availability of affordable and accessible housing effects all of our impoverished populations, but even more so those living with disabilities, as they are likely to encounter complex housing problems in terms of **Affordability** and **ACCESSIBILITY**. Using these remaining funds for assistance for people with disabilities would be a **BENEFICIAL ACTION** in “reduce(ing) homelessness and continued institutionalization of people with disabilities”.

Section 8 Housing Choice Vouchers:

- Continue the commitment to deinstitutionalization of our aging and disability populations through access to housing vouchers and the Indiana Money Follows the Person program. This allows people to integrate back into their communities through affordable and accessible options.
- Further, make vouchers available to those not affiliated with the Indiana Money Follows the Person program and available for all people living in institutions with access to community supports and services.

Palmer 2

- In some instances home ownership is the **ONLY** option for people who need accessible and/or specific housing accommodations. Reinstating the Section 8 Homeownership Program within the IHCD would allow those in need to purchase homes.

Home Modifications:

- People looking to “age in place” are often in need of home modifications due to the onset of a temporary or permanent disability. IHCD funds **NEED** to be made available for home modifications that **allow for people to remain in their homes instead of being forced into institutional settings.**
- Home modifications **SHOULD** include but not be limited to building ramps. Accessible doorways and bathrooms are examples of additional needs that many of our aging seniors and people with disabilities are in need of. Major structural modifications and repairs, such as new furnaces and roofs, are also necessary for people to remain in their home. The IHCD needs to also allocate funding to these types of modifications.
- In addition, these funds **SHOULD** be available to both **RENTERS AND HOME OWNERS** alike. People who rent are often unable to purchase a home and when their residence becomes inaccessible they too, are forced into institutional settings

Visitability:

- **Support the creation of visitability ordinances, mandating that ALL new single family, town homes, duplexes, and triplexes be built to visitable standards. Visitability allows for our seniors to age in place and maintain their quality of life. This creates fair and equal access for all people, with and without disabilities, to purchase homes, visit friends/families’ homes, and increase their quality of life.**
- **Continue to expand upon the current incentives for HOME and LIHTC funding to develop visitable features in new construction.**

Affordable Housing:

- People with disabilities/receiving a fixed SSI income are unable to afford Section 504 accessible housing. ALL of these new properties should be made affordable for people with limited, lowest incomes.
- This is not just a Section 504 issue, as there is simply not enough affordable and accessible housing for those who fall into the <20% area median income. These needs to be more <20% area median income units made available.

Thank you again for the opportunity to comment and give recommendations concerning the Consolidated Plan. I appreciate IHCD and your efforts in improving affordable and accessible housing for all Hoosiers, specifically our aging and disability populations.

I would be happy to answer any questions regarding my comments above.

Sincerely,
Anne Palmer
annep@the-league.org

Anderson 1

Scott, Corrie

From: Scott, Corrie
Sent: Thursday, May 14, 2015 12:41 PM
To: 'jackie evans'
Cc: Sipe, Jacob
Subject: RE: Consolidated Plan

Dear Ms. Anderson,

Thank you for expressing your interest in the 2015 Consolidated 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 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov

From: jackie evans [<mailto:jackie@atticin.org>]
Sent: Thursday, May 14, 2015 11:05 AM
To: Sipe, Jacob
Cc: Scott, Corrie
Subject: con plan

May 14, 2015

Indiana Housing and Community Development Authority
Indiana Office of Community and Rural Affairs
One North Capital-Suite 600
Indianapolis, IN 46204-2288
Attn: Mr. Sipe and Ms. Scott

Dear Mr. Sipe and Ms. Scott:

I am the Executive Director of ATTIC, INC., an Independent Living Center for People with Disabilities. I feel that there are a variety of needs for people with disabilities to keep them in their own home safely and independently.

Several housing needs are consistently needed to accomplish goals. These are some of the issues that are on the rise:

Anderson 2

SECTION 8 HOUSING CHOICE VOUCHERS:

To continue your commitment to the deinstitutionalization of our aging and disability populations through access to housing vouchers. Also, continue with vouchers for Money follows the Person. This allows people to integrate from nursing homes to their communities through affordable and accessible options.

HOME MODIFICATIONS:

People looking to “age in place” are often in need of home modifications due to the onset of a temporary or permanent disability. IHCD funds need to be made available for home modifications that will allow consumers to stay in their own home instead of an institutional setting.

Home modifications should include but not be limited to building ramps; accessible doorways and bathrooms are examples of additional needs that many of our aging seniors and people with disabilities may require. Major structural modifications and repairs, such as new furnaces and roofs, are also necessary for people to remain in their home. The IHCD needs to also allocate funding to these types of modifications.

Our advocates have seen direct need for this as a transition specialist has told our consumers' families that if this is not in place, the doctor will not release them until certain modifications are done. These modifications are often very costly and if it is a rental, the landlord will say they cannot afford the modification needed. There are not programs to assist with funding the necessary modifications especially for rentals.

AFFORDABLE HOUSING:

People with disabilities receiving a fixed income are unable to afford Section 504 accessible housing. All of these new properties should be made affordable for people with limited or low incomes.

We hope to see a shift in the proposed budget for the coming year to address both the critical affordable housing needs identified and the growing need for existing and new housing that can be used by all of Indiana's citizens.

Thank you for this opportunity and for your continued leadership.

Sincerely,

Rebecca Anderson
Executive Director
ATTIC, INC.
812-886-0575

Scott, Corrie

From: Crouch, Matthew
Sent: Friday, May 15, 2015 10:57 AM
To: Scott, Corrie
Cc: Zarazee, Megan
Subject: Travel

Can you reserve a car for me to pick up in Bloomington for the following dates?

Pick up: 5/26- 8 AM
Drop off: 5/29- 8AM

5/26

- Purpose: CDBG-Stellar
- Destination: Wabash

5/27

- Purpose: CDBG-Stellar
- Destination: Greencastle

5/28

- Purpose: HCI
- Destination: Rushville

Pick up: 6/1- 5 PM
Drop off: 6/5- 5PM

6/2

- Purpose: JLUS
- Destination: NSA Crane

6/3

- Purpose: JLUS
- Destination: Bedford and Loogootee

6/4

- Purpose: JLUS
- Destination: Sullivan

6/5

- Purpose: JLUS
- Destination: Bedford/Bloomington

Thanks!

Matt Crouch, EDFP | Project Manager
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204

Murphy

Scott, Corrie

From: Scott, Corrie
Sent: Friday, May 15, 2015 12:55 PM
To: 'pmurphy@lifetime-resources.org'
Subject: Consolidated Plan

Dear Mr. Murphy,

Thank you for expressing your interest in the 2015 Consolidated Plan.

Although your letter 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 2015 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 K. Scott, CAP-OM | Administrative Assistant
Indiana Office of Community and Rural Affairs

One North Capitol, Suite 600
Indianapolis, IN 46204
317.233.3762 | ocra.IN.gov



May 13, 2015

2015 Consolidated Plan
Indiana Office of Community and Rural Affairs
One North Capitol – Suite 600
Indianapolis, IN 46204-2027

To whom it may concern:

Thank you for the opportunity to review the State of Indiana Consolidated Plan for 2015 draft. I respectfully offer the following written comments.

As the Housing Services Director at LifeTime Housing Group (LTHG)/LifeTime Resources in Dillsboro, Indiana I am advocating on behalf of those seniors who are most in need of affordable housing. The seniors that I am referring to are those who live in rural areas and have an income below 40% of annual median income.

There is a great need for Housing Choice Vouchers (HCV) in south eastern Indiana. LTHG works with individuals at 30% of income who would qualify for an HCV. Persons scrimp and save to pay rent and not become homeless. Tenant based housing choice vouchers for seniors are needed to off set housing cost burdens.

As noted on page 45 of the draft: "Rental housing is lacking for extremely low income households, whose needs have grown since the Great Recession according to stakeholders. The Census estimates that there are 16,000 more renters earning less than \$20,000 per year in 2013 than in 2007 (includes entitlement areas). Almost 10,000 of these earn less than \$5,000 per year." The statement is particularly true for seniors in rural areas.

There is great need for increased funding to support and implement Aging In Place principles specifically for home owners. As documented on page 33: "In addition to cost burden, many low income households living in rural areas, regardless of race or ethnicity, need housing rehabilitation assistance. Many low income residents in rural areas are financially unable to make needed repairs. Making needed repairs not only improves residents' safety and quality of life, they help to preserve affordable housing in areas where it is limited." Increased funding for rural Owner Occupied Rehabilitation (OOR) is essential.

The draft further emphasizes the need for increased OOR funding on page 36. "As Indiana's population ages, more and more household need accessibility modifications to their homes, ranging from ramps and widening doors to installation of grab bars, raised toilets and roll-in showers. These are improvements that many low income seniors cannot afford to make. Many of these homeowners also need assistance with yard work and exterior home maintenance. In addition, many seniors have high costs of medications and other home care needs which strains already limited incomes for housing and costs of daily living."

RECEIVED

MAY 15 15

Community &
Rural Affairs



Murphy 2

The OOR grant application appears to favor urban areas where sizeable non profits can partner with large municipalities to implement an OOR program. One example is the ineligible cost activities. Large urban governments and non profits can more easily absorb these costs. Small rural counties, cities and non profits have great difficulty bearing the expense. LTHG has implemented many OOR grants over a number of years. LTHG consistently loses money absorbing ineligible costs. As noted on page 57 of the draft the first most commonly mentioned stakeholder suggestion is "Setting aside additional funding for home modifications."

In light of the above, I offer the following suggestions.

1. Prioritize a set aside of Housing Choice Vouchers for those rural seniors with incomes below 40 % of annual median income.
2. Create incentives for rural small municipalities to partner with small rural non profits to expand OOR services in the least populated areas.

I appreciate the opportunity to provide the above in regards to the draft plan.

Sincerely,



Paul F. Murphy, M.Ed.

Housing Services Director

LifeTime Housing Group, Inc.

Phone: 812-432-6270

Fax: 812-432-6263

pmurphy@lifetime-resources.org



2820 S. Main Street Road
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Farm 812-882-4967

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If you would like more information on this contact me at: dennismouzin@mouzinbrothers.com

As President of the National Watermelon Association I am very familiar with the need for this housing project.

Thank you
Dennis Mouzin

Email: deb@sicilindiana.org



Toll Free: 800-845-6914

www.sicilindiana.org

Cell: 812-653-7366

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Name: Deb Newlin

I have a consumer that had a ^{well} pump quit. They went 4 days with "NO" water. Could you get a grant that a senior or low income person could apply for to get a ^{water} pump for a well. My consumer was lucky enough to have "4" children that got together & bought the consumer a new water pump for the well because the old one could not be fixed. Most elderly & low income consumers do not have the money for this expense & do not have the family that has the money to help buy this pricey item for them.



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Name: Ralph Parkhiser

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Name: Beth Ann Cooper

Housing for Migrate Farm Workers

Migrate farm workers are a vital part of farm community. With the strict regulations
with in turn increase the housing cost make a hardship on the
farm. Financial assistance is needed for the farmer who depends on the migrate farm
workers. Please add financial aid to this plan.

Thank you



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If you would like to receive a final copy of the 2015-2019 Consolidated Plan emailed to you, please make sure you have put your name and email address on the sign-in sheet. Thank you!

Name: go Balthus
Housing for Migrate Faem Workers

I have been around faeming industrial
my whole life. The farming community needs
the assistance for Migrant Workers. They
are important part of the farming facilities.
Any financial assistance will help improve
and help the agriculture business.



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

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Name: Cindy Mazin

My concern as part of the Agricultural Community is the lack of grant funding available for migrant worker housing. If the questions asked to complete the assessment phase did not include language about migrant worker housing then it would be expected you don't have the necessary information to include them or identify them as a special need. Migrant worker housing is extremely important to this agricultural community. Without the migrant workers we would not be able to grow & produce the seasonal produce that supplies the entire Midwest. What do we need to submit as a group to get them identified as a special need? Please advise.

Please keep comments private. Cindy Mazin

Cindymazin@mazinbrothers.com



Indiana Consolidated Plan

2015-2019 Five-year Consolidated Plan and 2015 Annual Action Plan

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Name: Terry Moreland 802 E. Senthower circle Vincennes, IN 47594

I think new rentals need to be bigger as far as floor space because later in life a persons in a wheel chair need room to get around in rentals and public places need to have more blue handicapped buttons to open doors for wheelchair folks.

Migrants workers need better living conditions when in field work here in U.S. Need to keep vets in mind when build visibility home they use large track chair that need space

Thanks



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Name:

Terry Moreland

More need to be done about reinstating
Section 8 butchers, and rentals for handiapped
individuals need to increase in the future
and CEBS monies need to stop going down.
Keep are veterans in mind their are
about 58,000 to 60,000 thanks

Terry

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Name: Terry L Moreland

I would like to see me IHCDA monies
along with CeBG monies applied to
visibility go to these kind of homes
to make it easy to get grant, and some monies
to go migrant workers to build better homes
when they come and work the fields in summer
time. Also to keep in mind new and rentals
homes for the handipred their need to be more
floor space in some cases and more new places
need to be built in the near future.
Thanks and let's keep our wounded vets
in mind their are about 58,000 of them
thanks