

Amended on September 25, 2020 to add CDBG CARES Act funds to this 2020-2024 Consolidated Plan and 2020 Annual Action Plan Amended on November 2, 2020 to add additional allocation of CDBG CARES Act funds to this 2020-2024 Consolidated Plan and 2020 Action Plan Minor Amendment January 8, 2021, to reflect a corrected entitlement allocation. On November 8, 2020, the City of Goshen was notified of the corrected entitlement allocation by the Department of Housing and Urban Development. Substantial Amendment on November 4, 2022 to add initiation of new activity of homeownership assistance to the 2020-2024 Consolidated Plan and 2022 Annual Action Plan

## Executive Summary

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

#### 1. Introduction

The City of Goshen CDBG program seeks to strengthen neighborhoods by providing decent housing and a suitable living environment, and to strengthen individuals by expanding economic opportunities for low/moderate income individuals and families through access to resources to improve their lives, homes and neighborhoods. Goshen's CDBG projects and activities will be implemented in the following areas: (1) Housing Opportunities; (2) Access to Services; and (3) Neighborhood Revitalization.

CDBG funding may be used in the following areas:

- Housing Rehabilitation, single- and multi-unit
- Public Service Grants
- Public Facilities & Improvements
- Housing Construction
- Homeownership Services
- General Program Planning & Administration

Public facilities & improvements activities will be located in CDBG income-eligible areas. All other activities will have project locations distributed throughout the City of Goshen.

Public facilities & improvements and public service grants have the primary objective of creating a suitable living environment, with the outcomes of promoting a more sustainable and livable community through public facilities & improvements, and access to affordable services through public service grants.

Housing activities have the primary objective of decent housing, with outcomes of affordability of housing-related services and availability of affordable housing.

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

### Objectives

#### (1) Decent Affordable Housing

Rehabilitation of single- and multi-unit housing, new housing construction, and energy conservation for affordable housing to meet the objective of decent, affordable housing.

#### (2) Suitable Living Environment

Public facilities and improvements to meet the objective of a suitable living environment.

Public service grants for direct assistance to low and moderate income families to meet the objective of a suitable living environment.

#### (3) Other: Program planning and general administration.

### Outcomes

#### (1) Availability/Accessibility

Public service grants with the outcome of providing access to affordable services, such as a daily nutrition program, medication assistance, senior transportation, shelter meals, primary medical care and early childhood education.

#### (2) Affordability

Rehabilitation of single- and multi-unit housing, new housing construction, and energy conservation for affordable housing, with outcomes of affordable housing services and availability of quality, affordable housing units for low and moderate income Goshen households.

#### (3) Sustainability

Public facilities and improvements, rehabilitation of single- and multi-unit housing, new housing construction, and energy conservation for affordable housing, with the outcome of promoting a livable, sustainable community, including the creation and preservation of affordable housing.

## **3. Evaluation of past performance**

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The Goshen CDBG program has typically met its yearly objectives, primarily due to strong local partnerships, active sub-recipients, and the strength of the neighborhood-based approach to implementation. The neighborhood-based approach includes support for neighborhood associations, resulting in neighborhood residents who actively participate in efforts to achieve improvements. The objectives of creating a suitable living environment and supporting decent, affordable housing have been met by funding activities which have broadened access to affordable housing and services for low/moderate income individuals and families in Goshen. These efforts have contributed to a more livable and sustainable community.

In the two most recent program years, neighborhood infrastructure projects were not able to be implemented. At the same time, the need for quality affordable housing has increased. As a result, the current five-year plan will expand the range of planned CDBG activities, and the unspent funds will be reallocated to new activities and expended in PY 2020.

#### **4. Summary of citizen participation process and consultation process**

Input and participation are encouraged throughout the CDBG planning and implementation process through a variety of methods. During each program year, numerous contacts and meetings occur with agencies and individuals, both formal and informal. The CDBG administrator regularly participates with several local groups, such as the Indiana Region 2 Homeless Coalition (the local Continuum of Care), and the LaCasa loan committee, in order to learn from others, strengthen relationships and work cooperatively with the local network, which is essential to the success of Goshen's CDBG program.

Invitations to all public hearings/meetings are sent to a broad contact list, including local public housing and service agencies, Warsaw Housing Authority, institutions such as Goshen Health, Goshen Community Schools, Goshen College, Oaklawn, and Greencroft Goshen, City staff, City Council members and local media. As required by Goshen's citizen participation plan, two public hearings were held. The first was held to review the current five-year plan and program year 2019, to solicit input for the 2020-2024 consolidated plan, and to set priorities for program year 2020 activities. The second public hearing was held to review the draft 2020-2024 consolidated plan and 2020 annual action plan. The draft plans were posted on the City website with a link for feedback. Notice of the availability of the draft plans was also emailed to the local Continuum of Care (Indiana Region 2 Homeless Coalition). The submittal of the final plan was approved at a public meeting of the Goshen City Council.

Input for the 2020-2024 consolidated plan & 2020 annual action plan was obtained through the following:

- Community Relations Commission meeting, January 14, 2020
- Council on Aging board meeting, January 15, 2020
- Walnut Hill board meeting, January 16, 2020
- Warsaw Housing Authority board meeting, January 28, 2020
- Public hearing for current plan review and input for upcoming plans, January 30, 2020

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- Goshen Interfaith board meeting, February 12, 2020
- Elkhart County Clubhouse board meeting, February 20, 2020
- Lacasa board meeting, February 25, 2020
- Meeting with Continuum of Care to discuss homeless needs, February 27, 2020
- Public comment period for draft 2020-2024 consolidated plan & 2020 annual action plan, April 2, 2020, through May 1, 2020
- Public hearing to review current plans and take input for draft 2020-2024 consolidated plan & 2020 annual action plan, April 21, 2020
- Public meeting to authorize 2020-2024 consolidated plan & 2020 annual action plan submittal, May 5, 2020

Details of the input received is provided in the attached Citizen Participation Overview and Detailed Comments, also referenced in the following section.

### **5. Summary of public comments**

Details of public comments and the citizen participation process is provided in the attached Citizen Participation Overview and Detailed Comments.

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

All comments were accepted.

### **7. Summary**

Input for the 2020-2024 consolidated plan and 2020 annual action plan was provided through a variety of methods, including agency board meetings, public hearings/meetings, and individual contacts. Public input indicated support for continuing and expanding the priorities of the prior five-year plan, and also for the specific activities in the proposed annual action plan.

## The Process

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

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

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

Agency Role	Name	Department/Agency
CDBG Administrator	goshen	Planning Office

Table 1 – Responsible Agencies

### Narrative

The Goshen Planning Office has primary responsibility for management of the CDBG program, with assistance provided by the Clerk Treasurer's Office, Goshen Board of Public Works & Safety, Goshen Engineering Department, Goshen Community Development Department, Mayor's Office, and Goshen Common Council. The CDBG Administrator works in partnership with community partners, such as Lacasa, other local agencies, and other jurisdictions. The Goshen Planning Office oversees the implementation of the annual action plan, including public facilities improvements, public services, and housing activities. Warsaw Housing Authority administers a Housing Choice voucher program, including Goshen vouchers, and the Permanent Supportive Housing program is administered by Lacasa and Oaklawn.

### Consolidated Plan Public Contact Information

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## **PR-10 Consultation – 91.100, 91.110, 91.200(b), 91.300(b), 91.215(I) and 91.315(I)**

### **1. Introduction**

The five-year plan was developed through extensive coordination with public and private housing, health and social service agencies. The City of Goshen, City of Elkhart, Elkhart County, Lacasa and Habitat for Humanity worked together and shared resources to conduct a countywide housing needs assessment, published in 2014, to gather information on housing availability and affordability, housing conditions, and future housing development priorities. The process included a resident housing survey and three strategy workshops, one in each jurisdiction. Input from the surveys and workshops identified strategies to address housing needs. The City of Goshen solicited input and enhanced coordination by attending agency board meetings, other public meetings, and coordinating with the Continuum of Care.

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

Opportunities for feedback are provided throughout the CDBG program year, but during the planning process for the consolidated plan and each annual action plan a more formal effort is made to solicit input, following, at a minimum, the guidance provided by Goshen's Citizen Participation Plan. A list of more than 100 contacts from local housing and service providers, neighborhood association leaders, City of Goshen elected officials, City staff, Warsaw Housing Authority, local institutions such as Goshen Health, Greencroft Goshen, Oaklawn, Goshen College, and Goshen Community Schools, and local media are notified of, and invited to, each public meeting, and are also provided notice of public hearings and notice of the availability of draft plans and the public comment period. Notice of the availability of the draft plans is also provided to the local Continuum of Care, with opportunity for input provided during a regular meeting and during the public comment period.

A public hearing with 13 participants, representing seven local agencies and one City department, was held on January 30, 2020, to review the current five-year and program year 2020 plans, and to discuss needs, priorities and activities for the 2020-2024 consolidated plan and 2020 annual plan. A second public hearing was held April 21, 2020, as part of a regular Goshen Common Council meeting, to provide opportunity for input for the draft 2020-2024 consolidated plan and 2020 annual plan, and to review program year 2019. The draft 2020-2024 consolidated plan and 2020 annual plan were also distributed to the Continuum of Care and to the broad CDBG contact list.

As described above, the City consulted with and received information from housing agencies, social service agencies, the Continuum of Care, Warsaw Housing Authority, local neighborhood associations, institutions such as Goshen Health, Oaklawn, Greencroft Goshen, Goshen College and Goshen Community Schools, and other entities, as part of the annual planning process, including those focusing

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on services to children (such as Boys & Girls Club and Walnut Hill Early Childhood Education Center), services to elderly persons (such as Council on Aging), persons with disabilities (such as ADEC and Goodwill Industries of Michiana), persons with HIV/AIDS and their families (such as AIDS Ministries/AIDS Assist), persons with mental illness (such as Elkhart County Clubhouse and Oaklawn), and homeless persons (such as Goshen Interfaith, Oaklawn and Elkhart County Clubhouse).

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

The local Continuum of Care, the Indiana Region 2 Homeless Coalition (IR2HC), was consulted through a group email and a meeting held February 27, 2020. The IR2HC is a group of public and private agencies who meet bi-monthly to coordinate and discuss services to address and prevent homelessness in Elkhart County and Region 2. Goshen's CDBG administrator serves on the executive committee of the CoC and attends regular CoC meetings.

The CDBG administrator is also on the State Continuum of Care email distribution list, and a member of the Region 2 CoC has been serving on the State's funding and strategy committee, representing Region 2.

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

The City does not receive or allocate ESG funds, but the draft 2020-2024 consolidated plan and 2020 annual plan were distributed to the Region 2 Continuum of Care for review and comment. The CDBG administrator serves on the executive committee of the Region 2 Continuum of Care.

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

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

1	<b>Agency/Group/Organization</b>	BOYS AND GIRLS CLUB OF GREATER GOSHEN, INC.
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 30, 2020, public hearing, participated in the sub-recipient meeting, provided input through direct contact, and is a current public service grant sub-recipient.
2	<b>Agency/Group/Organization</b>	CENTER FOR HEALING & HOPE
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 30, 2020, public hearing, participated in the sub-recipient meeting, and is a current public service grant sub-recipient.
3	<b>Agency/Group/Organization</b>	GOSHEN INTERFAITH HOSPITALITY NETWORK
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, is a member of the Region 2 Continuum of Care, provided input at an agency board meeting, and is a current public service grant sub-recipient.
4	<b>Agency/Group/Organization</b>	MAPLE CITY HEALTH CARE CENTER, INC.
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 30, 2020, public hearing, participated in the sub-recipient meeting, and is a current public service grant sub-recipient.



5	<b>Agency/Group/Organization</b>	LACASA OF GOSHEN, INC
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, was a partner in the countywide housing needs assessment, implements the housing rehabilitation portion of the City's CDBG program, assists in CDBG program planning through neighborhood outreach, is designated as a CBDO, is a member of the Region 2 Continuum of Care, participated in the January 30, 2020, public hearing and the sub-recipient meeting, and provided input at an agency board meeting.
6	<b>Agency/Group/Organization</b>	WALNUT HILL EARLY CHILDHOOD EDUCATION CENTER
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 30, 2020, public hearing, participated in the sub-recipient meeting, provided input at an agency board meeting, and is a current public service grant sub-recipient.
7	<b>Agency/Group/Organization</b>	Salvation Army Goshen
	<b>Agency/Group/Organization Type</b>	Public Service Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Public service needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
8	<b>Agency/Group/Organization</b>	Goshen Engineering Department
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department

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	<b>What section of the Plan was addressed by Consultation?</b>	Public facilities & improvements
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and participates in the planning and implementation of public facilities & improvements projects.
9	<b>Agency/Group/Organization</b>	Council on Aging
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Public service needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 30, 2020, public hearing, participated in the sub-recipient meeting, provided input at an agency board meeting, and is a current public service grant sub-recipient.
10	<b>Agency/Group/Organization</b>	YWCA OF NORTH CENTRAL INDIANA
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, was consulted through direct contact, and is a member of the Region 2 Continuum of Care.
11	<b>Agency/Group/Organization</b>	REAL SERVICES, INC.
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
12	<b>Agency/Group/Organization</b>	ADEC
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities

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	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
13	<b>Agency/Group/Organization</b>	AIDS MINISTRIES AIDS ASSIST
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with HIV/AIDS
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
14	<b>Agency/Group/Organization</b>	Elkhart County Clubhouse
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 30, 2020, public hearing, participated in the sub-recipient meeting, provided input at an agency board meeting, and is a current public service grant sub-recipient.
15	<b>Agency/Group/Organization</b>	EMERGE MINISTRIES
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is a member of the Region 2 Continuum of Care.

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16	<b>Agency/Group/Organization</b>	GOODWILL OF MICHIANA
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-Employment Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is a member of the Region 2 Continuum of Care.
17	<b>Agency/Group/Organization</b>	OAKLAWN PSYCHIATRIC CENTER, INC.
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Homeless Needs - Chronically homeless Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, is a member of the Region 2 Continuum of Care, and provides permanent supportive housing.
18	<b>Agency/Group/Organization</b>	VA Northern Indiana
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Health Health Agency Other government - Federal
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Chronically homeless Homelessness Needs - Veterans Non-Homeless Special Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.

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19	<b>Agency/Group/Organization</b>	Warsaw Housing Authority
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, provided input at an agency board meeting, and is consulted via staff contacts.
20	<b>Agency/Group/Organization</b>	HABITAT FOR HUMANITY OF ELKHART COUNTY
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, is a member of the Region 2 Continuum of Care, and participated in the countywide housing needs assessment.
21	<b>Agency/Group/Organization</b>	Goshen Building Department
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and provides input related to housing needs.
22	<b>Agency/Group/Organization</b>	Goshen Community Development Dept
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, provides economic development input, and is consulted on the overall CDBG program.

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23	<b>Agency/Group/Organization</b>	Goshen Community Relations Commission
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Fair Housing & Equal Opportunity
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and the activities of the Commission are an integral part of the overall CDBG program.
24	<b>Agency/Group/Organization</b>	Goshen Community Schools
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Homeless Needs - Families with children
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
25	<b>Agency/Group/Organization</b>	Goshen Mayor's Office
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Economic Development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the April 21, 2020, public hearing, participated in the May 5, 2020, public meeting, and provides overall guidance for the CDBG program.
26	<b>Agency/Group/Organization</b>	Goshen Police Department
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood activities
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, provides liaison officers for each neighborhood association, participated in the April 21, 2020, public hearing, and in the May 5, 2020, public meeting.

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27	<b>Agency/Group/Organization</b>	Goshen Parks Department
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Public facilities & improvements
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and participates in public facilities & improvements projects.
28	<b>Agency/Group/Organization</b>	Goshen Health
	<b>Agency/Group/Organization Type</b>	Health Agency Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
29	<b>Agency/Group/Organization</b>	Greencroft Goshen
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is consulted regarding housing needs for the elderly.
30	<b>Agency/Group/Organization</b>	MACOG
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Transportation
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and the CDBG administrator participates in the agency's transit advisory committee.

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31	<b>Agency/Group/Organization</b>	Maple Court Place
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
32	<b>Agency/Group/Organization</b>	Goshen College
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Education & public service needs
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
33	<b>Agency/Group/Organization</b>	Goshen Ministerial Association
	<b>Agency/Group/Organization Type</b>	Religious Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
34	<b>Agency/Group/Organization</b>	Goshen Common Council
	<b>Agency/Group/Organization Type</b>	Other government - Local Elected Officials
	<b>What section of the Plan was addressed by Consultation?</b>	Overall plan review
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	All Goshen Common Council members are on the email distribution list, and one public hearing and one public meeting are held during regular Council meetings. Council members are invited to all neighborhood CDBG meetings.



35	<b>Agency/Group/Organization</b>	Chamberlain Neighborhood Association
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
36	<b>Agency/Group/Organization</b>	College Farm Neighborhood Association
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
37	<b>Agency/Group/Organization</b>	East Goshen Neighborhood Association
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
38	<b>Agency/Group/Organization</b>	East Lincoln Crossroads Neighborhood Association
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
39	<b>Agency/Group/Organization</b>	Historic Dickerson Landing Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association

Demo

	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
40	<b>Agency/Group/Organization</b>	Historic Racemere Peninsula Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
41	<b>Agency/Group/Organization</b>	Historic Southside Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
42	<b>Agency/Group/Organization</b>	Maplecrest Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
43	<b>Agency/Group/Organization</b>	Northside Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development

Demo

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
44	<b>Agency/Group/Organization</b>	Parkside Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
45	<b>Agency/Group/Organization</b>	Pickwick Village Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
46	<b>Agency/Group/Organization</b>	Rieth Park Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
47	<b>Agency/Group/Organization</b>	Shanklin Millrace Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development

	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
48	<b>Agency/Group/Organization</b>	Terrace Park Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
49	<b>Agency/Group/Organization</b>	West Goshen Neighborhood
	<b>Agency/Group/Organization Type</b>	Neighborhood Association
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list, and meetings are held with neighborhood associations in preparation for all public facilities & improvements projects.
50	<b>Agency/Group/Organization</b>	Campus Center for Young Children
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
51	<b>Agency/Group/Organization</b>	SPA Womens' Minstry
	<b>Agency/Group/Organization Type</b>	Services - Housing Services - Victims
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs

<p><b>How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?</b></p>	<p>Agency is on email distribution list and participates in the CoC.</p>
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**Identify any Agency Types not consulted and provide rationale for not consulting**

No agency types were excluded from consultation.

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

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Indiana Region 2 Homeless Coalition	Goshen's Strategic Plan goals of providing permanent supportive housing for the chronically homeless and providing emergency shelter for homeless individuals and families are the same as other Continuum of Care agencies.

**Table 3 – Other local / regional / federal planning efforts**

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

Coordination with other public agencies will continue to be strengthened through regular interaction and meetings. Strong local networks are in place which address several priorities outlined in the CDBG plan, such as housing, homeless services and non-homeless special needs. For example, the CDBG administrator participates in the Indiana Region 2 Homeless Coalition (IR2HC), which is a group of public and private agencies who meet bi-monthly to coordinate and discuss services to address and prevent homelessness in Elkhart County and Region 2. The IR2HC is the local Continuum of Care, and Goshen's CDBG administrator serves on the executive committee of the CoC. The Goshen and Elkhart CDBG programs maintain a cooperative relationship. City of Goshen, City of Elkhart and Elkhart County, along with other housing providers, all participated in a joint housing needs assessment, which began in PY 2013 and was completed in PY 2014.

**Narrative (optional):**

While there is always room for improvement, strong partnerships exist between public, private, non-profit and institutional groups in Goshen, and between the Goshen and Elkhart City CDBG programs. These relationships, which are developed, facilitated and maintained through regular contact, are a primary strength of Goshen's CDBG program, and ensure consistent implementation of the annual plan.

## Demo

One outcome of these partnerships has been several combined applications for grant funding, such as the successful application to IHCD for Neighborhood Stabilization Program Round 1, which was a partnership of the City of Goshen, Habitat for Humanity, and Lacasa. Another successful joint grant application was between Lacasa and the Council on Aging of Elkhart County, to provide housing rehabilitation assistance to elderly homeowners countywide. These efforts demonstrate the level of cooperation and strong working relationships which exist, which will continue to be strengthened, and which will ensure the ongoing successful implementation of the CDBG annual plan.

## **PR-15 Citizen Participation – 91.105, 91.115, 91.200(c) and 91.300(c)**

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

Input for the 2020-2024 consolidated plan & 2020 annual action plan was obtained through the following:

- Community Relations Commission meeting, January 14, 2020
- Council on Aging board meeting, January 15, 2020
- Walnut Hill board meeting, January 16, 2020
- Warsaw Housing Authority board meeting, January 28, 2020
- Public hearing for current plan review and input for upcoming plans, January 30, 2020
- Goshen Interfaith board meeting, February 12, 2020
- Elkhart County Clubhouse board meeting, February 20, 2020
- Lacasa board meeting, February 25, 2020
- Meeting with Continuum of Care to discuss homeless needs, February 27, 2020
- Public comment period for draft 2020-2024 consolidated plan & 2020 annual action plan, April 2, 2020, through May 1, 2020
- Public hearing to review current plans and take input for draft 2020-2024 consolidated plan & 2020 annual action plan, April 21, 2020
- Public meeting to authorize 2020-2024 consolidated plan & 2020 annual action plan submittal, May 5, 2020
- Public comment period for draft of substantial amendment to the 2020-2024 consolidated plan & 2020 annual action plan and Citizen Participation Plan reflecting the addition of CDBG-CV funds to address urgent needs related to the coronavirus, September 17, 2020, through September 21, 2020.
  
- Public comment period for draft of substantial amendment to the 2020-2024 consolidated plan & 2020 annual action plan reflecting an additional CDBG-CV allocation to address urgent needs related to the coronavirus, October 22, 2020, through October 26, 2020.
- Public comment period for draft of minor amendment to the 2020 Annual Action Plan, within the 2020-2024 consolidated plan reflecting a corrected entitlement allocation, December 17, 2020, through December 31, 2020.
- Public hearing for substantial amendment to the 2020-2024 consolidated plan and 2022 annual action plan, October 24, 2022.

Demo

- 30-day public comment period for the draft of substantial amendment to the 2020-2024 consolidated plan and 2022 annual action plan for initiation of a new activity, homeownership assistance program, October 6, 2022 through November 4, 2022.

Opportunities for feedback are provided throughout the CDBG program year, but during the planning process for the consolidated plan and each annual action plan a more formal effort is made to solicit input, following, at a minimum, the guidance provided by Goshen's Citizen Participation Plan. A list of more than 100 contacts from local housing and service providers, neighborhood association leaders, City of Goshen elected officials, City staff, local institutions, and local media are notified of, and invited to, each public meeting, and are also provided notice of public hearings and notice of the availability of the draft annual plan and the public comment period. Notice of the availability of the draft annual plan is also provided to the local Continuum of Care (Indiana Region 2 Homeless Coalition), along with opportunity for public comment.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Council on Aging board meeting	Service Providers	10 attenders	Comments used as a reference for the CDBG plans.	None	
2	Council on Aging board meeting	Service Providers	3 attenders	Comments used as a reference for the CDBG plans.	None	



Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	Council on Aging board meeting	Residents of Public and Assisted Housing  Housing Authority board members	10 attenders	Information provided has been incorporated into the public housing responses.	None	
4	Public Hearing	Non-targeted/broad community  Housing & Service Providers	13 attenders, representing seven local agencies, and one City department	Comments used as a reference for the CDBG plans.	None	
5	Council on Aging board meeting	Service Providers	10 attenders	Comments used as a reference for the CDBG plans.	None	
6	Council on Aging board meeting	Persons with disabilities  Service Providers	7 attenders	Comments used as a reference for the CDBG plans.	None	
7	Council on Aging board meeting	Housing & Service Providers	8 attenders	Comments used as a reference for the CDBG plans.	None	
8	Public Meeting	Continuum of Care	Regular CoC meeting with 21 participants	Information is included in the plan related to homeless needs.	None	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
9	Council on Aging board meeting	Continuum of Care	Notice of 30-day public comment period and draft plan was provided to CoC	Information is included in the plan related to homeless needs	None	
10	Internet Outreach	Non-targeted/broad community	Notice of 30-day public comment period, notice of public hearing, and draft plan was posted on the City website.	Comments are included in citizen participation section.	None	<a href="http://goshenindiana.org/cdbg">http://goshenindiana.org/cdbg</a>
11	Council on Aging board meeting	CDBG contact list	Notice of 30-day public comment period, notice of public hearing, and draft plan was provided to CDBG contact list.	Comments are included in citizen participation section.	None	
12	Public Hearing	Non-targeted/broad community	Regular Council meeting	Comments are included in citizen participation section.	None	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
13	Council on Aging board meeting	CDBG sub-recipients and partner agencies	Email to 8 agencies to determine unfunded needs related to the coronavirus	Responses were used to prepare funding plan	None	
14	Council on Aging board meeting	Continuum of Care	Notice of 5-day public comment period and draft substantial amendment for CDBG-CV was provided to CoC	Comments are included in citizen participation section	None	
15	Council on Aging board meeting	CDBG contact list	Notice of 5-day public comment period and draft substantial amendment for CDBG-CV was provided to CDBG contact list.	Comments are included in citizen participation section.	None	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
16	Internet Outreach	Non-targeted/broad community	Notice of 5-day public comment period and draft substantial amendment for CDBG-CV was posted on the City website.	Comments are included in citizen participation section.	None	<a href="http://goshenindiana.org/cdbg">http://goshenindiana.org/cdbg</a>
17	Council on Aging board meeting	Continuum of Care	Notice of 5-day public comment period and draft substantial amendment for CDBG-CV was provided to CoC	Comments are included in citizen participation section.	None	
18	Council on Aging board meeting	CDBG contact list	Notice of 5-day public comment period and draft substantial amendment for CDBG-CV was provided to CDBG contact list	Comments are included in citizen participation section.	None	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
19	Internet Outreach	Non-targeted/broad community	Notice of 5-day public comment period and draft substantial amendment for CDBG-CV was posted on the City website.	Comments are included in citizen participation section.	None	<a href="http://goshenindiana.org/cdbg">http://goshenindiana.org/cdbg</a>
20	Council on Aging board meeting	CDBG Contact list	Notice of 15-day public comment period for minor amendment and budget change was provided to CDBG contact list	Comments are included in citizen participation section	None	
21	Council on Aging board meeting	Continuum of Care	Notice of 15-day public comment period for minor amendment and budget change was provided to Continuum of Care contact list	Comments are included in citizen participation section	None	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
22	Internet Outreach	Non-targeted/broad community	Notice of 15-day public comment period for minor amendment and budget change was posted on the City website	Comments are included in citizen participation section	None	<a href="http://goshenindiana.org/cdbg">http://goshenindiana.org/cdbg</a>
23	Public Hearing	Non-targeted/broad community	Regular council meeting	Comments are included in citizen participation section.	none	
24	Newspaper Ad	Non-targeted/broad community	Notice of 30-day public comment period, notice of public hearing, and availability of draft substantial amendment was published in the Goshen News	Comments are included in citizen participation section.	None.	

Demo

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
25	Council on Aging board meeting	CDBG & Continuum of Care contact lists	Notice of 30-day public comment period, notice of public hearing, and draft substantial amendment was provided to CDBG contact list and Continuum of Care.	Comments are included in citizen participation section.	None.	
26	Internet Outreach	Non-targeted/broad community	Notice of 30-day public comment period, notice of public hearing, and draft substantial amendment was posted on the City website.	Comments are included in citizen participation section.	None	<a href="http://goshenindiana.org/cdbg">http://goshenindiana.org/cdbg</a>

**Table 4 – Citizen Participation Outreach**

## Needs Assessment

### NA-05 Overview

#### Needs Assessment Overview

Goshen's population is located in ten Census tracts. Tracts 1, 2, 302 and 502 have the highest concentration of low/mod income population, and within these tracts the low/mod population is generally concentrated in north and east Goshen. There are seven CDBG income-eligible block groups within tracts 1, 2, 302 and 502. A map of the income-eligible block groups is provided as an attachment.

CDBG area-based activities are chosen based on Census income eligibility data and on the basis of aging or deterioration in housing and infrastructure. The intent for CDBG area-based activities is to include infrastructure improvements, neighborhood development activities, and housing activities, including rehabilitation, new construction, and support for homeownership. Infrastructure projects improve some of the oldest infrastructure within the City. CDBG funds alone are not adequate to carry out large-scale projects, and the City will continue to use CDBG funds with local funds and other funding sources. The benefit of combining CDBG funds with other funding sources is that a greater impact can be achieved than could be achieved with CDBG funds alone. In order to address a broader range of housing needs, including multi-family rehab, energy conservation, and new housing construction, CDBG funds will be available to a qualified Community-Based Development Organization (CBDO). CDBG funds will continue to be allocated for the development and strengthening of neighborhood associations, as part of the overall CDBG implementation.

Priority needs and specific objectives were identified as outlined in the Citizen Participation section and include:

#### 1) Housing Opportunities

- Improve owner-occupied housing through rehab
- Increase quality of rental housing
- Increase transitional housing options
- Reduce housing cost burden through higher wage job opportunities and job training
- Provide permanent supportive housing for chronically homeless
- Support affordable housing creation and preservation
- Provide emergency shelter for homeless individuals and families
- Expand housing options and assistance
- Maintain and facilitate use of Housing Choice voucher program

#### 2) Access to Services



## Demo

- Increase access to affordable healthcare
- Increase services for mentally ill
- Support programs for youth
- Increase access to affordable childcare and early childhood education
- Support services for elderly and the disabled
- Support public transportation
- Provide emergency shelter for homeless individuals and families
- Provide permanent supportive housing for chronically homeless
- Support counseling/advocacy for underserved populations
- Increase access to substance abuse prevention and treatment
- Support life skill development
- Support nutrition programs and food assistance

### 3) Neighborhood Revitalization

- Improve owner-occupied housing through rehab
- Remove blighted residential properties
- Address issue of vacant/foreclosed houses
- Increase quality of rental housing
- Support public infrastructure projects
- Repair/replace existing sidewalks
- Support neighborhood parks

As a way to address obstacles to meeting underserved needs, CDBG implementation will be a cooperative effort of the City, local housing and service providers, LaCasa, Habitat for Humanity, Warsaw Housing Authority and neighborhood residents. As neighborhood associations develop, residents address problems and work together to improve their living environment.

### **NA-05 Addendum**

In matters of urgent need, these identified priority needs and objectives will still be a focus and consideration of highest impact in such circumstances will be factored in program implementation. CDBG will connect with its partners in identifying new or additional need as a result of the current crisis and respond in accordance with community need.

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

### **Summary of Housing Needs**

Based on 2011-2015 CHAS data, out of 12,025 total households, 3,684, or 31%, experienced housing problems. Of these 2,369 (64%) with housing problems were renters, and 1,315 (36%) with housing problems were owners. ACS 2013-17 data indicate 55% of total households are owners and 45% are renters. Of total households, 14% (1,630) have household income  $\leq$  30% HAMFI (HUD Adjusted Median Family Income), 11% (1,335) have household income 31-50% HAMFI, 21% (2,495) have household income 51-80% HAMFI, and 54% (6,565) have household income  $>$  80% HAMFI.

#### *Housing Needs: Extremely Low-income Renters ( $\leq$ 30% Area Median Income)*

Based on 2011-2015 CHAS data, 880 of 2,369 renter households (37%) experiencing housing problems had incomes  $\leq$  30% of median. The majority of these problems were related to cost burden. The data indicate 63% of the households in this income category pay more than 50% of their income for rent and utilities. Among these households, small related households (2-4 members) have the highest cost burden. It is likely that any renter in this income category that does not have housing problems is already receiving some form of housing assistance.

#### *Housing Needs: Extremely Low-income Owners ( $\leq$ 30% Area Median Income)*

Based on 2011-2015 CHAS data, 240 of 1,315 owner households (18%) experiencing housing problems had incomes  $\leq$  30% of median. The majority of these problems were related to cost burden. The data indicate 91% of owner households in this income category pay more than 30% of their income for mortgage, taxes, insurance and utilities. This is significantly higher than renter households in the same income category. According to the data, elderly and small related households in this income category have significant cost burden. Cost burden among owner households results in the deferral of maintenance and repairs, with the end result that the lowest income owners may have worse physical housing conditions than the lowest income renters.

#### *Housing Needs: Low-income Renters ( $>$ 30 to $\leq$ 50% Area Median Income)*

Based on 2011-2015 CHAS data, 250 of 2,369 renter households (11%) experiencing housing problems had incomes 31-50% of median. Approximately 74% of the households in this income category pay more than 30% of their income for rent and utilities. Among rental households in this income category, elderly and small related households have the highest percentage of cost burden. The significant cost burden in this income category indicate a continued need for housing assistance.

#### *Housing Needs: Low-income Owners ( $>$ 30 to $\leq$ 50% Area Median Income)*

Demo

Based on 2011-2015 CHAS data, 140 of 1,315 owner households (11%) experiencing housing problems had incomes 31-50% of median. The most significant cost burden among owner households in this income category is experienced by elderly households.

*Housing Needs: Moderate-income Renters (>50 to ≤80% Area Median Income)*

Based on 2011-2015 CHAS data, 120 of 2,369 renter households (5%) experiencing housing problems had incomes 51-80% of median. The cost burden for renters in this income category is lower than in all other renter categories, with 42% of the renter households paying more than 30% of income for rent and utilities. In this income category, elderly and small related households have the highest percentage of cost burden.

*Housing Needs: Moderate-income Owners (>50 to ≤80% Area Median Income)*

Based on 2011-2015 CHAS data, 140 of 1,315 owner households (11%) experiencing housing problems had incomes 51-80% of median. The data indicate cost burden is the most significant housing problem, with 35% of the owner households in this income category paying more than 30% of income for housing costs. Small related and elderly households in this income category have the highest percentage of cost burden.

Demographics	Base Year: 2009	Most Recent Year: 2015	% Change
Population	31,719	32,950	4%
Households	12,133	12,030	-1%
Median Income	\$40,408.00	\$41,117.00	2%

**Table 5 - Housing Needs Assessment Demographics**

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

**Number of Households Table**

	0-30% HAMFI	>30-50% HAMFI	>50-80% HAMFI	>80-100% HAMFI	>100% HAMFI
Total Households	1,630	1,335	2,495	1,350	5,215
Small Family Households	840	380	1,010	525	2,500
Large Family Households	250	65	340	155	385
Household contains at least one person 62-74 years of age	200	270	355	255	1,220
Household contains at least one person age 75 or older	185	400	500	165	465
Households with one or more children 6 years old or younger	600	224	625	390	585

**Table 6 - Total Households Table**

# Demo

**Data Source:** 2011-2015 CHAS

**Housing Needs Summary Tables**

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Substandard Housing - Lacking complete plumbing or kitchen facilities	0	50	70	10	130	0	10	10	0	20
Severely Overcrowded - With >1.51 people per room (and complete kitchen and plumbing)	0	0	0	0	0	0	0	0	0	0
Overcrowded - With 1.01-1.5 people per room (and none of the above problems)	100	40	35	4	179	0	0	55	40	95
Housing cost burden greater than 50% of income (and none of the above problems)	775	155	15	0	945	240	130	80	20	470
Housing cost burden greater than 30% of income (and none of the above problems)	85	475	480	15	1,055	40	105	485	90	720

Demo

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
Zero/negative Income (and none of the above problems)	60	0	0	0	60	10	0	0	0	10

**Table 7 – Housing Problems Table**

Data 2011-2015 CHAS  
Source:

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

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>										
Having 1 or more of four housing problems	880	250	120	15	1,265	240	140	140	60	580
Having none of four housing problems	400	570	1,005	505	2,480	40	380	1,225	770	2,415
Household has negative income, but none of the other housing problems	60	0	0	0	60	10	0	0	0	10

**Table 8 – Housing Problems 2**

Data 2011-2015 CHAS  
Source:

3. Cost Burden > 30%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
<b>NUMBER OF HOUSEHOLDS</b>								
Small Related	555	255	190	1,000	130	35	295	460
Large Related	170	40	40	250	10	15	80	105
Elderly	109	280	195	584	130	165	200	495
Other	130	135	140	405	10	35	25	70

Demo

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
Total need by income	964	710	565	2,239	280	250	600	1,130

Table 9 – Cost Burden > 30%

Data 2011-2015 CHAS  
Source:

4. Cost Burden > 50%

	Renter				Owner			
	0-30% AMI	>30-50% AMI	>50-80% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	Total
NUMBER OF HOUSEHOLDS								
Small Related	510	95	0	605	105	15	65	185
Large Related	170	15	0	185	10	0	0	10
Elderly	70	55	85	210	115	85	15	215
Other	130	30	0	160	10	35	0	45
Total need by income	880	195	85	1,160	240	135	80	455

Table 10 – Cost Burden > 50%

Data 2011-2015 CHAS  
Source:

5. Crowding (More than one person per room)

	Renter					Owner				
	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total	0-30% AMI	>30-50% AMI	>50-80% AMI	>80-100% AMI	Total
NUMBER OF HOUSEHOLDS										
Single family households	100	40	35	4	179	0	0	55	20	75
Multiple, unrelated family households	0	0	0	0	0	0	0	0	20	20
Other, non-family households	0	0	0	0	0	0	0	0	0	0
Total need by income	100	40	35	4	179	0	0	55	40	95

Table 11 – Crowding Information – 1/2

Data 2011-2015 CHAS  
Source:

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

Table 12 – Crowding Information – 2/2

Data Source  
Comments:

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

According to 2013-2017 ACS data, there are 3,353 single-person households in Goshen, which is 27% of total households. The 2013-2017 ACS data indicate median household income in the past 12 months for single-person households is around \$49,000, compared to \$53,556 for all family types. No data were available for single person households relating to physical housing problems. Information from Warsaw Housing Authority (WHA) indicates 63% of housing vouchers issued in 2019 were for single person households. Based on WHA experience, one-bedroom housing units are in short supply. This is confirmed by other agencies with voucher-based housing, including Oaklawn and VA. Single person households with a housing voucher have difficulty finding a one-bedroom housing unit. Limited availability of units for housing voucher holders is due to a number of factors, including the actual number of one-bedroom units, a strong housing market with high rents, rental management agencies refusing to accept tenants with housing vouchers, and continued additional/new regulations for landlords who participate in the housing voucher program.

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

Based on 2013-2017 ACS five-year estimates, there are a total of 4,523 disabled individuals in Goshen, which is approximately 14% of the total population. There is no data available regarding the housing problems experienced by this population. The 2013-2017 ACS data indicate median earnings in the past 12 months for individuals with a disability are \$19,020 compared to \$27,597 for individuals with no disability.

Emergency shelter for victims of domestic violence is provided in Elkhart County, and serving Goshen, by the YWCA Safe Haven women's shelter, which is the only shelter specifically for domestic violence victims and their children in Elkhart County. The shelter has 15 units for households with children, with a total of 35 beds. In 2019, the shelter served 705 women and children, and took 583 calls on the crisis line. The shelter is a temporary crisis shelter, providing housing for a 30-60 day stay. Two transitional housing units are available, but the majority of clients choose to move to scattered site housing when they leave the shelter. The shelter works closely with shelters in adjacent communities if the need arises. Sometimes women request shelter outside of Elkhart County for safety reasons or to be closer to their support system.



## Demo

The crucial housing issue for domestic violence victims is independent housing once they leave the shelter. There are sometimes barriers in accessing public or independent housing in the short period of time that women are in the crisis shelter. Stays are sometimes extended if this facilitates a client getting their own housing. Clients never leave the shelter with no place to go. Safe Haven works with local housing providers to provide housing for those who need permanent housing. Public housing usually moves fairly quickly because domestic violence victims receive priority from Elkhart Housing Authority.

There is no data available specifically for victims of dating violence, sexual assault and stalking in need of housing assistance. According to the most recent data available, the Elkhart County Office of Victim Assistance Services total number of contacts in 2017 included 35 adult victims of sexual assault, 0 victims of teen dating violence, and 672 victims of stalking/harassment.

### **What are the most common housing problems?**

The housing problems included in the CHAS data are substandard housing (incomplete kitchen or plumbing facilities), severe overcrowding (more than 1.51 people per room), overcrowding (1.01 to 1.5 people per room), cost burden greater than 50%, and cost burden greater than 30 percent. According to 2013-2017 ACS five-year estimates, 268 of 12,435 occupied housing units (2.2%) lack complete kitchen facilities, 11 of 12,435 occupied housing units (0.1%) lack complete plumbing facilities, 294 of 12,435 occupied housing units (2.4%) have more than one person per room, and 1,262 of 6,897 owner occupied units (18%) have cost burden of 30% or greater, and 2,278 of 5,538 renter occupied units (41%) have cost burden of 30% or greater. The data indicate that cost burden is the most significant housing problem.

The significance of cost burden is also demonstrated in the Goshen resident housing survey results for the Elkhart County Housing Needs Assessment, carried out in 2014, in which three of the top four housing problems experienced in the past two years included difficulty paying rent/mortgage, difficulty paying utilities and inability to make needed repairs/improvements to own home.

Worst case physical housing problems of rental properties have been addressed in the City of Goshen through the Neighborhood Preservation Ordinance (NPO), adopted in May 2002, which established minimum housing standards and continued a rental housing registration and inspection program. The City has enforced minimum standards, for occupied and vacant rental properties, which has likely contributed to the small number of occupied properties that lack complete plumbing and kitchen facilities.

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

Based on 2011-2015 CHAS data, households (owner and renter) with the lowest incomes (0-30% AMI), and small related and elderly households have the highest percentage of housing problems. There are a

similar number of elderly renter and owner households experiencing cost burden problems. The 2011-2015 CHAS data show cost burden exceeding 30% for 17% of total owner households and 41% for total renter households, based on 55% owner occupancy and 45% renter occupancy per 2013-2017 ACS five-year estimates.

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

Based on input from the local Continuum of Care, agencies serving low/mod individuals and families, at-risk populations, including low-income individuals and families who are currently housed but are at risk of becoming unsheltered, and formerly homeless families and individuals receiving assistance, are generally characterized by low education, lack of jobs, low paying jobs, large families, lack of financial management skills, substance abuse, lack of opportunities, lack of awareness of available resources, mindset of dependency, poor credit, criminal background, domestic violence, PTSD, and lack of social skills to manage applications for assistance. These individuals and families are in need of education, training, better paying jobs, financial management training, substance abuse treatment, access to crisis services, case management and advocacy to provide stability/prevent homelessness, and counseling. Short term housing assistance without supportive services is not likely to address the needs of these individuals and families.

Rapid re-housing in Region 2 CoC is currently provided by Brightpoint and Beaman Home. Neither agency specifically serves Goshen. Brightpoint does administer Supportive Services for Veteran Families (SSVF) which includes a rapid re-housing component that serves Elkhart County. For SSVF clients termination of assistance is a decision between the client and their caseworker, when they no longer need assistance or feel they are "on their feet" and able to move forward. Clients leaving assistance continue to need support for rental issues, and they need knowledge of supportive services in their area. In 2019, six households with a total of 16 individuals were served through SSVF in Elkhart County, and in 2018, eight households with a total of 13 individuals were served. Brightpoint receives SSVF referrals primarily from the VA homeless team and Faith Mission.

Beaman Home is located in Kosciusko County, and their rapid re-housing program serves Kosciusko, Fulton and Marshall Counties. Needs of rapid re-housing clients nearing termination of assistance include transportation, access to long-term assistance, child care, and care for chronic health issues.

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

Not applicable.

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

Based on input from the local Continuum of Care, agencies serving low/mod individuals and families, housing characteristics that have been linked with instability and an increased risk of homelessness are substandard housing, severe cost burden, tenants paying cash for rent with no receipts provided by landlord, predatory landlords who exploit tenants and evict without following the law, and tenants who lack the skills, knowledge or confidence to stand up for themselves.

Local service providers also indicate that individuals who have a combination of special needs are at higher risk for instability and an increased risk of homelessness because their needs are more complex and difficult to address by one single agency. Service providers also indicate that individuals with mental illness may have an increased risk for homelessness. A number of permanent supportive housing units have been constructed in Goshen in recent years, and for one agency serving people with mental illness, this has reduced by half the number of their clients who are homeless.

**Discussion**

Based on 2011-2015 CHAS data, 45% of the households in Goshen have household income less than or equal to 80% HAMFI. Out of total households, 31% are experiencing housing problems and 13% are experiencing severe housing problems. Cost burden is the most significant housing problem, with 15% of total households experiencing cost burden greater than 30% and 12% of total households experiencing cost burden greater than 50 percent. The 2011-2015 CHAS data show cost burden exceeding 30% for 17% of total owner households and 41% for total renter households, based on 55% owner occupancy and 45% renter occupancy per 2013-2017 ACS five-year estimates.

The significance of cost burden is also demonstrated in the Goshen resident housing survey results for the Elkhart County Housing Needs Assessment, carried out in 2014, in which three of the top four housing problems experienced in the past two years included difficulty paying rent/mortgage, difficulty paying utilities and inability to make needed repairs/improvements to own home.

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

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

**Introduction**

Census 2010 data indicate that Goshen's population is 78.2% White, 2.6% Black/African American, 1.2% Asian, 0.5% American Indian/Alaska Native, and 28.1% Hispanic/Latino. The 2011-2015 CHAS data for housing problems by race and percent AMI do not show any disproportionately greater need for any racial or ethnic group in comparison to the needs as a whole. For the population of 0-30% AMI experiencing housing problems, 53% are White, 14% are Black/African American, 2% are Asian and 27% are Hispanic. For the population of 30-50% AMI experiencing housing problems, 77% are White, 3% are Black/African American, 2% are Asian, and 15% are Hispanic. For the population of 50-80% AMI experiencing housing problems, 74% are White, 3% are Black/African American, and 23% are Hispanic. For the population of 80-100% AMI experiencing housing problems, 78% are White and 22% are Hispanic.

**0%-30% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,240	315	70
White	665	145	50
Black / African American	169	45	0
Asian	30	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	335	120	20

**Table 13 - Disproportionally Greater Need 0 - 30% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

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

**30%-50% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	970	365	0
White	745	320	0
Black / African American	25	0	0
Asian	15	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	150	15	0

**Table 14 - Disproportionally Greater Need 30 - 50% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

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

**50%-80% of Area Median Income**

Housing Problems	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,225	1,270	0
White	905	895	0
Black / African American	40	0	0
Asian	4	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	280	370	0

**Table 15 - Disproportionally Greater Need 50 - 80% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

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

**80%-100% of Area Median Income**

<b>Housing Problems</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	180	1,170	0
White	140	785	0
Black / African American	0	44	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	40	305	0

**Table 16 - Disproportionally Greater Need 80 - 100% AMI**

Data Source: 2011-2015 CHAS

\*The four housing problems are:

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

**Discussion**

Based on the 2011-2015 CHAS data, housing problems in Goshen are distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole.

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

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

### Introduction

Severe housing problems are defined as one or more of the following: 1) incomplete kitchen facilities, 2) incomplete plumbing facilities, 3) more than 1.5 persons per room, and 4) cost burden exceeding 50 percent. Census 2010 data indicate that Goshen's population is 78.2% White, 2.6% Black/African American, 1.2% Asian, 0.5% American Indian/Alaska Native, and 28.1% Hispanic/Latino. The 2011-2015 CHAS data for severe housing problems by race and percent AMI do not show any disproportionately greater need for any racial or ethnic group in comparison to the needs as a whole. For the population of 0-30% AMI experiencing severe housing problems, 52% are White, 11% are Black/African American, 3% are Asian and 30% are Hispanic. For the population of 30-50% AMI experiencing severe housing problems, 81% are White and 10% are Hispanic. For the population of 50-80% AMI experiencing severe housing problems, 69% are White, 12% are Black/African American, and 21% are Hispanic. For the population of 80-100% AMI experiencing severe housing problems, 47% are White and 53% are Hispanic. In this category the Hispanic population is over-represented at 53% based on the percent of total Hispanic population of 28 percent, but in the 30-50% AMI category they are under-represented at 10 percent.

### 0%-30% of Area Median Income

Severe Housing Problems*	Has one or more of four housing problems	Has none of the four housing problems	Household has no/negative income, but none of the other housing problems
Jurisdiction as a whole	1,120	440	70
White	585	230	50
Black / African American	124	90	0
Asian	30	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	335	120	20

**Table 17 – Severe Housing Problems 0 - 30% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

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

**30%-50% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	390	950	0
White	315	755	0
Black / African American	0	25	0
Asian	0	15	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	40	125	0

**Table 18 – Severe Housing Problems 30 - 50% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

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

**50%-80% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	260	2,230	0
White	180	1,615	0
Black / African American	30	10	0
Asian	0	4	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	55	600	0

**Table 19 – Severe Housing Problems 50 - 80% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

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



**80%-100% of Area Median Income**

<b>Severe Housing Problems*</b>	<b>Has one or more of four housing problems</b>	<b>Has none of the four housing problems</b>	<b>Household has no/negative income, but none of the other housing problems</b>
Jurisdiction as a whole	75	1,275	0
White	35	895	0
Black / African American	0	44	0
Asian	0	0	0
American Indian, Alaska Native	0	0	0
Pacific Islander	0	0	0
Hispanic	40	305	0

**Table 20 – Severe Housing Problems 80 - 100% AMI**

Data Source: 2011-2015 CHAS

\*The four severe housing problems are:

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

**Discussion**

Based on the 2011-2015 CHAS data, severe housing problems in Goshen are distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole. In the 50-80% AMI category the Hispanic population is over-represented at 53% based on the total Hispanic population of 28 percent, but in the 30-50% AMI category they are under-represented at 10 percent.

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

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

**Introduction:**

Census 2010 data indicate that Goshen's population is 78.2% White, 2.6% Black/African American, 1.2% Asian, 0.5% American Indian/Alaska Native, and 28.1% Hispanic/Latino. The 2011-2015 CHAS data for housing cost burden by race and percent AMI do not show any disproportionately greater need for any racial or ethnic group in comparison to the needs as a whole. For the population of 0-30% AMI experiencing housing cost burden, 78% are White, 2% are Black/African American, 0.5% are Asian and 18% are Hispanic. For the population of 30-50% AMI experiencing housing cost burden, 75% are White, 5% are Black/African American, 1% are Asian, and 19% are Hispanic. For the population over 50% AMI experiencing housing cost burden, 65% are White, 8% are Black/African American, 2% are Asian and 21% are Hispanic.

**Housing Cost Burden**

Housing Cost Burden	<=30%	30-50%	>50%	No / negative income (not computed)
Jurisdiction as a whole	8,315	2,020	1,630	70
White	6,450	1,520	1,055	50
Black / African American	175	110	124	0
Asian	39	20	30	0
American Indian, Alaska Native	0	0	0	0
Pacific Islander	0	0	0	0
Hispanic	1,495	375	350	20

**Table 21 – Greater Need: Housing Cost Burdens AMI**

Data Source: 2011-2015 CHAS

**Discussion:**

Based on the 2011-2015 CHAS data, housing cost burden by percentage AMI are distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole.

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

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

Based on the 2011-2015 CHAS data, housing problems in Goshen are distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole. Severe housing problems in Goshen are also distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole. For severe housing problems, in the 50-80% AMI category the Hispanic population is over-represented at 53% based on the total Hispanic population of 28 percent, but in the 30-50% AMI category they are under-represented at 10 percent. The population experiencing housing cost burden by percentage AMI are distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole.

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

Not applicable.

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

Census 2010 data indicate Goshen's population is 78.2% White, 2.6% Black/African American, 1.2% Asian, 0.5% American Indian/Alaska Native, and 28.1% Hispanic/Latino. Census 2010 data were examined for race and Hispanic/Latino ethnicity by block group and then compared to the seven block groups with the largest percentages of low/mod income population to determine whether any racial or ethnic groups are disproportionately represented in any of the low/mod income areas. The results indicate that two low/mod income block groups, Census Tract 2, Block Group 3 and Census Tract 2, Block Group 4, have slightly higher proportions of Hispanic population compared to the population as a whole, at 43% and 36% respectively, as compared to 28% overall, and that the population of Census Tract 2, Block Group 4, is 8.5% Black/African American, as compared to 2.6% overall.

## NA-35 Public Housing – 91.205(b)

### Introduction

There are no public housing units within the City of Goshen. The City of Goshen works with Warsaw Housing Authority (WHA), Lacasa, Oaklawn Mental Health Center, Greencroft Goshen, Habitat for Humanity, Council on Aging, City of Elkhart, Elkhart County, and other local organizations to address housing and related needs. Goshen Housing Authority was dissolved in November 2018, and Goshen vouchers were absorbed by WHA. WHA tracks and reports Goshen vouchers separately at the local level, but HUD considers all vouchers as WHA vouchers. The Goshen vouchers absorbed by WHA are not reflected in the auto-filled PIC data. WHA does not maintain any properties. As of December 1, 2019, there were 338 Housing Choice Vouchers under lease, including 173 Goshen vouchers, and 24 vouchers granted but not yet under lease. Of the 173 Goshen vouchers, approximately 19% were NED (non-elderly disabled) vouchers for persons with disabilities. In mid-February 2020, there were 278 people on the waiting list for Goshen vouchers, with 112 local and 166 who do not live or work in Goshen. Housing Choice Vouchers are portable between housing authorities, but individual housing authorities may adopt a residency preference in addition to other local preferences and the HUD criteria for eligibility. WHA has adopted a residency preference, which for Goshen includes living or working in Goshen city limits.

**Please note: Auto-filled PIC data in the following tables do not reflect the absorption of Goshen vouchers by WHA.**

### Totals in Use

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
# of units vouchers in use	0	0	0	157	0	157	0	0	0

**Table 22 - Public Housing by Program Type**

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

Data Source: PIC (PIH Information Center)

**Characteristics of Residents**

	Program Type							
	Certificate	Mod-Rehab	Public Housing	Vouchers			Special Purpose Voucher	
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program
Average Annual Income	0	0	0	11,584	0	11,584	0	0
Average length of stay	0	0	0	4	0	4	0	0
Average Household size	0	0	0	1	0	1	0	0
# Homeless at admission	0	0	0	0	0	0	0	0
# of Elderly Program Participants (>62)	0	0	0	50	0	50	0	0
# of Disabled Families	0	0	0	48	0	48	0	0
# of Families requesting accessibility features	0	0	0	157	0	157	0	0
# of HIV/AIDS program participants	0	0	0	0	0	0	0	0
# of DV victims	0	0	0	0	0	0	0	0

**Table 23 – Characteristics of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Race of Residents**

Race	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
White	0	0	0	152	0	152	0	0	0
Black/African American	0	0	0	5	0	5	0	0	0
Asian	0	0	0	0	0	0	0	0	0
American Indian/Alaska Native	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0	0

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

**Table 24 – Race of Public Housing Residents by Program Type**

Data Source: PIC (PIH Information Center)

**Ethnicity of Residents**

Ethnicity	Certificate	Mod-Rehab	Public Housing	Program Type					
				Vouchers			Special Purpose Voucher		
				Total	Project - based	Tenant - based	Veterans Affairs Supportive Housing	Family Unification Program	Disabled *
Hispanic	0	0	0	8	0	8	0	0	0
Not Hispanic	0	0	0	149	0	149	0	0	0

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

**Table 25 – Ethnicity of Public Housing Residents by Program Type**

**Data Source:** PIC (PIH Information Center)

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

Based on recent vouchers issued by Warsaw Housing Authority (WHA), approximately one-third of participants are individuals with disabilities and 7% are elderly.

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

The current primary obstacle for WHA in issuing housing vouchers is the lack of available housing units. This is due to a combination of lack of supply, landlords unwilling to participate, strong housing market, and rental management agencies unwilling to rent to tenants with vouchers. Needs for those in transition from homelessness to housing include transportation, verifications and case management. WHA is working with other agencies who serve low/mod families to provide information on the voucher program, and coordinate case management. WHA is also inviting landlords to briefings, and will be providing information to participating landlords on new HUD best practices during 2020.

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

The housing problems included in the CHAS data are substandard housing (incomplete kitchen or plumbing facilities), severe overcrowding (more than 1.51 people per room), overcrowding (1.01 to 1.5 people per room), cost burden greater than 50%, and cost burden greater than 30 percent. According to 2013-2017 ACS five-year estimates, 268 of 12,435 occupied housing units (2.2%) lack complete kitchen facilities, 11 of 12,435 occupied housing units (0.1%) lack complete plumbing facilities, 294 of 12,435 occupied housing units (2.4%) have more than one person per room, and 1,262 of 6,897 owner occupied units (18%) have cost burden of 30% or greater, and 2,278 of 5,538 renter occupied units (41%) have cost burden of 30% or greater. The data indicate that cost burden is the most significant housing problem.

The significance of cost burden is also demonstrated in the Goshen resident housing survey results for the Elkhart County Housing Needs Assessment, carried out in 2014, in which three of the top four housing problems experienced in the past two years included difficulty paying rent/mortgage, difficulty paying utilities and inability to make needed repairs/improvements to own home.

### **Discussion**

In addition to the Housing Choice voucher program, subsidized housing available in Goshen includes 267 Section 8 units at Greencroft Goshen, which are all income-based rental units for the elderly. Also in Goshen is Maple Leaf Commons, a 41-unit Section 202 PRAC for elderly, and Mercer Manor, which has 15 income-based rental units (supported by USDA Rural Development). Lacasa is the general partner and property manager of a 72-unit Low-Income Housing Tax Credit project, Arbor Ridge Apartments. The Hattle Hotel and Shoots Building, two renovated rooming houses managed by Lacasa, provide a total of 28 affordable rental units, with efficiency, one- and two-bedroom units. Maple Court Place, a 60-



## Demo

unit affordable apartment complex, has six one-bedroom apartments, 24 two-bedroom apartments, 24 three-bedroom apartments and six four-bedroom apartments. Hawks Arts and Enterprise Center, which is providing 33 affordable housing units, is a \$6.8 million LIHTC project, fully occupied at the time of opening in April 2015.

Fixed-site permanent supportive housing (PSH) in Goshen is provided at two locations, Westplans Apartments and Lincoln West Apartments. Both projects are a partnership of Lacasa, the owner/developer/rental manager, and Oaklawn Mental Health Center, the service provider. Rental assistance is provided through Shelter Plus Care vouchers. Westplans has 15 units and was completed in program year 2013, and Lincoln West has 14 units and was completed in program year 2011. Oaklawn provides vouchers for scattered site PSH, including units occupied in Goshen, designated for individuals with disabilities. PSH is also provided by AIDS Ministries/AIDS Assist at two locations in the City of Elkhart, with a total of ten beds. Permanent supportive housing has contributed to preventing chronic homelessness by providing stable housing and supportive services to individuals who otherwise might experience homelessness.

## **NA-40 Homeless Needs Assessment – 91.205(c)**

### **Introduction:**

Advocacy, education and coordination of housing and homeless programs in Indiana are managed by the Indiana Housing & Community Development Authority (IHCDA), through the regional Continuum of Care (CoC) network. Goshen, located in Elkhart County, is part of Region 2 CoC, and actively participates with the Indiana Region 2 Homeless Coalition, which meets bi-monthly. Goshen's CDBG administrator serves on the executive committee of the CoC. The City of Goshen does not receive or expect to receive any direct public or private funding to address homeless needs and to prevent homelessness. Within Elkhart County, Goshen Interfaith, Faith Mission and the YWCA Women's Shelter provide emergency shelter, with a total of 82 beds available for households with children and 95 beds available for households with no children. Permanent supportive housing (PSH) is provided in Elkhart County by AIDS Ministries and Oaklawn Mental Health Center, with 29 fixed-site PSH units in Goshen, and an additional 38 fixed and scattered site (vouchers) beds in Elkhart County. Transitional housing for homeless households is provided by Emerge Ministries, located in the City of Elkhart, with a total of 16 beds, serving households with and without children. Faith Mission operates transitional housing in the City of Elkhart, with a total of 30 beds, serving households with children.

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

Based on input from the local Continuum of Care, agencies serving low/mod individuals and families, chronically homeless individuals are generally characterized by addictions, mental health issues, domestic violence and felonies. Chronically homeless families are generally characterized by poor education, illiteracy, poor parenting skills, large families, poor physical health, adverse childhood experiences, and are often victims of exploitation. Homeless families, including veterans, with children are often characterized by low education, lack of employment,

## Demo

low paying employment, lack of opportunities for advancement in employment, lack of financial management skills, poor credit, substance abuse, lack of awareness of resources, lack of social skills to manage applications, criminal background, domestic violence, PTSD, large families and mindset of dependency.

**Nature and Extent of Homelessness: (Optional)**

<b>Race:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
White	68	0
Black or African American	47	0
Asian	2	0
American Indian or Alaska Native	0	0
Pacific Islander	0	0
<b>Ethnicity:</b>	<b>Sheltered:</b>	<b>Unsheltered (optional)</b>
Hispanic	10	0
Not Hispanic	110	0

Data Source

Comments:

Source: 2019 Point-in-Time Homeless Count, Indiana Balance of State, Region 2 (1/23/2019)

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

The most recent data available are from the 2019 Point-in-Time (PIT) Homeless Count, which was conducted on January 23, 2019. The count was conducted in Region 2, which includes the counties of Elkhart, Kosciusko, Marshall and Fulton. No data was submitted for Fulton County. The 2019 PIT data reported in this plan are for Elkhart County only. Based on the 2019 PIT, there were 20 homeless families with children, with a total of 47 individuals, including 26 children under the age of 18. The 2019 PIT identified 73 homeless individuals in households with no children. One homeless veteran family was reported, along with eight homeless veteran households without children.

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

The 2019 PIT for Elkhart County reported 93 homeless households, made up of 120 individuals, 68 of whom are white (57%), 47 of whom are Black/African American (39%), two of whom are Asian (2%) and three of whom are multiple races (2%). Based on this data, Black/African American individuals are over-represented, as the percentage of Black/African Americans in the overall population is 2.6% for Goshen, 6.1% for Elkhart County and 14.6% for Elkhart City.

**Describe the Nature and Extent of Unsheltered and Sheltered Homelessness.**

The sheltered and unsheltered homeless are reported only as totals for Region 2 in the 2019 PIT data, so this breakdown is not available for Elkhart County. For Region 2, out of a total of 112 homeless households, 93 households (83%) were sheltered and 19 households (17%) were unsheltered. This would translate into 77 sheltered households and 16 unsheltered households, out of a total of 93

homeless households, in Elkhart County. The sheltered homeless count is likely underreported, as victim service providers are prohibited from reporting client data in the Homeless Management Information System (HMIS), which is used to track client data and data on the provision of housing and services. Although a comparable database is permitted to track clients of victim service providers, this requires additional funding, which is not readily available.

**Discussion:**

Currently, the system to address homelessness and the priority needs of homeless persons and families operates mostly informally through the cooperation and networking of local agencies providing housing and supportive services, and formally through the Indiana Region 2 Homeless Coalition (the local Continuum of Care), which meets bi-monthly to network around issues related to homelessness and to empower local agencies addressing homelessness. Goshen and Elkhart also each have an informal local homeless coalition, and these groups started meeting regularly in the past several years. Goshen's CDBG administrator serves on the CoC executive committee, and will continue to regularly participate with this group. Support will also continue for local agencies providing services to homeless families and individuals, and those at imminent risk of becoming homeless, including prevention of homelessness, outreach, emergency shelter, case management, transitional housing and permanent supportive housing.

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

### **Introduction:**

During the previous five-year plan, a meeting was held with service providers to discuss non-homeless special needs, including elderly, frail elderly, victims of domestic violence, persons with disabilities (mental, physical, developmental), persons with alcohol/drug addictions, and persons with HIV/AIDS. Individuals being released from jail/prison, and individuals with felonies, also have special needs, as employment, housing and services may be difficult to obtain. For the current five-year plan, service providers were either contacted directly via email or as part of other meetings, or agency websites were used to download annual reports and reporting data, which was then reviewed and incorporated.

### **Describe the characteristics of special needs populations in your community:**

The non-homeless special needs population includes elderly, frail elderly, victims of domestic violence, persons with disabilities (mental, physical, developmental), persons with alcohol/drug addictions, and persons with HIV/AIDS. Individuals being released from jail/prison, and individuals with felonies, also have special needs, as employment, housing and services may be difficult to obtain. Based on input from service providers, special needs populations are generally in need of housing assistance combined with supportive services. Access to employment, housing and health care are crucial for the special needs populations, and job training, mentoring and skill development programs are essential. Many in the special needs population have been homeless or may be at risk of becoming homeless, and long-term supportive services, combined with housing assistance, may be required to provide stability and increase self-sufficiency. Individuals with a combination of needs are the most difficult to serve, as their cases are complex and may require services from a number of agencies.

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

Housing and supportive service needs are determined by the local agencies serving special needs populations. Based on input from these agencies, access to employment, housing and health care are crucial for individuals with special needs, and job training, mentoring and skill development programs are essential. The elderly population has a high need for transportation, and the frail elderly may need case management services, including assistance with routine tasks such as grocery shopping, cleaning and meal preparation.

Many in the special needs population have been homeless or may be at risk of becoming homeless, and long-term supportive services, combined with housing assistance, may be required to provide stability and increase self-sufficiency. Supervised group living, including transition from in-patient mental health

facilities, is a high need. The incidence of homelessness has been reduced since permanent supportive housing opened for individuals with chronic mental illness.

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

Census data for the Elkhart-Goshen Metropolitan Statistical Area are not available specifically for the HIV/AIDS population, so information is from AIDS Ministries, an agency serving persons with HIV/AIDS and their families in Elkhart and St Joseph counties. According to the 2017 Annual Report for AIDS Ministries, 441 clients received care coordination services, with 57 new clients entering services in 2017. Housing was provided for 78 families, short-term rental assistance was provided for 179 individuals, and food was provided to 321 households. Care coordination services address needs related to access to housing, food, income, insurance, and health care, and with issues related to substance abuse and crisis prevention. Housing assistance is provided through rental assistance, one-time housing assistance payments, supportive housing, transitional housing, and permanent housing. The majority of clients (84%) are at or below poverty, and 96% of clients are insured.

**Discussion:**

Access to employment, housing and health care are crucial for individuals with special needs, and job training, mentoring and skill development programs are essential. Many in the special needs population have been homeless or may be at risk of becoming homeless, and long-term supportive services, combined with housing assistance, may be required to provide stability and increase self-sufficiency.

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

### **Describe the jurisdiction’s need for Public Facilities:**

The following specific needs were identified during the public input process:

- Emergency shelter for individuals and families who are homeless
- Temporary warming shelter in winter for unsheltered homeless

### **How were these needs determined?**

A public hearing to discuss needs, priorities and activities for the 2020-2024 consolidated plan and the 2020 annual plan, was held on January 30, 2020, with 13 individuals attending, representing eight local organizations, and one City department. The majority of the meeting was spent on five activities to identify needs, priorities and specific activities for the consolidated plan, including: 1) Five-year plan priorities, 2) Needs in income eligible Census areas, 3) General eligible activities, 4) Non-housing community development needs, and 5) Needs and actions for affirmatively furthering fair housing. Input related to non-housing community development needs was also obtained through visits with a number of agency boards, along with direct contact with agencies and individuals throughout Program Year 2019. The Region 2 Continuum of Care was consulted at a meeting on February 27, 2020.

### **Describe the jurisdiction’s need for Public Improvements:**

The following specific needs were identified during the public input process:

- Sidewalk repair of existing sidewalks
- Pedestrian crossing improvements
- Street lighting
- Technology infrastructure

### **How were these needs determined?**

A public hearing to discuss needs, priorities and activities for the 2020-2024 consolidated plan and the 2020 annual plan, was held on January 30, 2020, with 13 individuals attending, representing eight local organizations, and one City department. The majority of the meeting was spent on five activities to identify needs, priorities and specific activities for the consolidated plan, including: 1) Five-year plan priorities, 2) Needs in income eligible Census areas, 3) General eligible activities, 4) Non-housing community development needs, and 5) Needs and actions for affirmatively furthering fair housing. Input related to non-housing community development needs was also obtained through visits with a number of agency boards, along with direct contact with agencies and individuals throughout Program Year 2019. The Region 2 Continuum of Care was consulted at a meeting on February 27, 2020.



## **Describe the jurisdiction's need for Public Services:**

The following needs were identified during the public input process:

- Affordable health care
- Youth programs
- Affordable childcare and early childhood education
- Services for people with mental illness
- Counseling/advocacy for underserved populations
- Life skill development
- Services for elderly and the disabled
- Public transportation
- Nutrition programs and food assistance
- Emergency shelter for individuals and families who are homeless
- Permanent supportive housing for chronically homeless
- Substance abuse prevention and treatment
- Financial education/asset building programs
- Transition programs for people coming out of incarceration
- Workforce development for teens/youth

Based on public input and the City's experience of past CDBG plan implementation, the continued goal will be to provide public service grant funding close to the maximum cap of 15% of the annual entitlement (plus the prior year's program income), with the objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals, with the outcomes of available and affordable access to housing, healthcare, early childhood education, daily nutrition programs and other services.

## **How were these needs determined?**

A public hearing to discuss needs, priorities and activities for the 2020-2024 consolidated plan and the 2020 annual plan, was held on January 30, 2020, with 13 individuals attending, representing eight local organizations, and one City department. The majority of the meeting was spent on five activities to identify needs, priorities and specific activities for the consolidated plan, including: 1) Five-year plan priorities, 2) Needs in income eligible Census areas, 3) General eligible activities, 4) Non-housing community development needs, and 5) Needs and actions for affirmatively furthering fair housing. Input related to non-housing community development needs was also obtained through visits with a number of agency boards, along with direct contact with agencies and individuals throughout Program Year 2019. The Region 2 Continuum of Care was consulted at a meeting on February 27, 2020.

# Housing Market Analysis

## MA-05 Overview

### Housing Market Analysis Overview:

The following information is based primarily on data from the 2013-2017 American Community Survey 5-year estimates along with information from the Elkhart County Housing Needs Assessment 2014 and from Comprehensive Housing Affordability Strategy (CHAS) data, 2012-16 ACS.

There are 12,435 households in Goshen, of which 67.1 percent are family households, 46.3 percent are married couple households, and 36.1 percent are households with children under age 18. Approximately 10.5 percent of households are headed by females who have children under 18 living at home (with no husband present). Single-person households are 27 percent of total households. The average household size is 2.59.

The median household income in Goshen is \$46,055. Approximately 6.2 percent of the households (770) have an income below \$10,000 and 1.1 percent of households have an income over \$200,000.

In Goshen, 17.3 percent of the total population and 13.6 percent of families live in poverty. Of children under 18, 25.1 percent live in poverty, and 7.1 percent of people over age 65 live in poverty. Of the Hispanic population, 35.1 percent of families live in poverty.

In Goshen there are 13,309 housing units, of which 93.4 percent are occupied. The owner occupied vacancy rate is 1.8 percent, while the rental vacancy rate is 5.5 percent. While the vacancy rate is low in Goshen, a significant number of vacant homes are vacant for “other” reasons (meaning they are not for sale or rent) which could be a concern. Goshen has adopted minimum housing standards, and enforces these standards for long-term vacant properties.

In Goshen, 53.8 percent of housing units are single detached units. More than ten percent are mobile homes, and 7.7 percent are in structures with 3-4 units.

Of housing units in Goshen, 14.9 percent have one bedroom and 55 percent have three or more bedrooms, but there are a range of housing sizes available. Overcrowding is not an issue in Goshen as no units have more than two people per room.

In Goshen, 18.9 percent of housing units were built in 1939 or before, 17.1 percent were built during the 1990s, 15.3% were built between 2000 and 2009, and there is good distribution of housing units built in each decade.

In Goshen, 55 percent of housing units are owner occupied and 45 percent are renter occupied. In Indiana, 69 percent of housing units are owner occupied and 31 percent are renter occupied. The average owner-occupied household size is 2.68, while for renter households it is 2.48.

For owner-occupied housing units in Goshen, the median home value is \$111,000 and the median gross rent is \$745 for renter-occupied units. The majority of rental households in Goshen, 73.5 percent, pay \$500 to \$999 gross rent per month.

In Goshen, 22.7 percent of owner-occupied housing units with a mortgage have a housing cost burden over 30 percent of household income, with 14.9 percent having a cost burden over 35 percent.

Of renter households in Goshen, 43.6 percent spend more than 30 percent of their household income on housing, with 33.8 percent of renter households spending more than 35 percent.

In Goshen, of 12,365 households there are 5,525 renter households, a rental rate of 45 percent. Approximately 58 percent of renter households are low income (below 80 percent HAMFI), compared to 34 percent of owner households. Of total renter households, 39 percent are very low income (below 50 percent HAMFI), and 21 percent extremely low income (below 30 percent HAMFI) compared to 12 percent very low income and five percent extremely low income owner households. Several sources indicate high demand for both owner and renter housing units compared to the supply of new units being constructed.

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

### Introduction

The following information is based primarily on data from the 2013-2017 American Community Survey 5-year estimates along with information from the Elkhart County Housing Needs Assessment 2014 and from Comprehensive Housing Affordability Strategy (CHAS) data, 2012-16 ACS.

In Goshen there are 13,309 housing units, of which 93.4 percent are occupied. The owner occupied vacancy rate is 1.8 percent, while the rental vacancy rate is 5.5 percent. While the vacancy rate is low in Goshen, a significant number of vacant homes are vacant for “other” reasons (meaning they are not for sale or rent) which could be a concern. Goshen has adopted minimum housing standards, and enforces these standards for long-term vacant properties.

In Goshen, 53.8 percent of housing units are single detached units. More than ten percent are mobile homes, and 7.7 percent are in structures with 3-4 units.

Of housing units in Goshen, 14.9 percent have one bedroom and 55 percent have three or more- bedrooms, but there are a range of housing sizes available. Overcrowding is not an issue in Goshen as no units have more than two people per room.

In Goshen, 18.9 percent of housing units were built in 1939 or before, 17.1 percent were built during the 1990s, 15.3% were built between 2000 and 2009, and there is good distribution of housing units built in each decade.

In Goshen, 55 percent of housing units are owner occupied and 45 percent are renter occupied. In Indiana, 69 percent of housing units are owner occupied and 31 percent are renter occupied. The average owner-occupied household size is 2.68, while for renter households it is 2.48.

### All residential properties by number of units

Property Type	Number	%
1-unit detached structure	7,140	55%
1-unit, attached structure	570	4%
2-4 units	1,945	15%
5-19 units	1,210	9%
20 or more units	755	6%
Mobile Home, boat, RV, van, etc	1,370	11%
<b>Total</b>	<b>12,990</b>	<b>100%</b>

**Table 26 – Residential Properties by Unit Number**

Data Source: 2011-2015 ACS

## Unit Size by Tenure

	Owners		Renters	
	Number	%	Number	%
No bedroom	10	0%	170	3%
1 bedroom	150	2%	1,435	27%
2 bedrooms	1,595	24%	1,945	37%
3 or more bedrooms	4,980	74%	1,750	33%
<b>Total</b>	<b>6,735</b>	<b>100%</b>	<b>5,300</b>	<b>100%</b>

Table 27 – Unit Size by Tenure

Data Source: 2011-2015 ACS

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

Warsaw Housing Authority (WHA) administers a housing choice voucher program that includes vouchers for Goshen. Goshen Housing Authority was dissolved in November 2018, and Goshen vouchers were transferred to WHA. WHA has committed to maintaining housing choice voucher assistance in Goshen. Housing vouchers are issued to families under 50 percent AMI. As a result of current strong employment, many working families are within 60 to 80 percent AMI, and as a result WHA is exploring the possible use of homeownership vouchers.

In addition to the Housing Choice voucher program, subsidized housing available in Goshen includes 267 Section 8 units at Greencroft Goshen, which are all income-based rental units for the elderly. Also in Goshen is Maple Leaf Commons, a 41-unit Section 202 PRAC for elderly, and Mercer Manor, which has 15 income-based rental units (supported by USDA Rural Development). Lacasa is the general partner and property manager of a 72-unit Low-Income Housing Tax Credit project, Arbor Ridge Apartments. The Hattle Hotel and Shoots Building, two deteriorating rooming houses that were renovated into affordable housing, provide a total of 28 affordable rental units, with efficiency, one- and two-bedroom units. A 60-unit apartment complex, Maple Court Place, affordable for low/moderate income persons, has six (6) one-bedroom apartments, 24 two-bedroom apartments, 24 three-bedroom apartments and six (6) four-bedroom apartments. Hawks Arts and Enterprise Center, which is providing 33 affordable housing units, is a \$6.8 million LIHTC project, fully occupied at the time of opening in April 2015. The project included HOME and FHLB funds.

There are 29 units of permanent supportive housing (PSH) in Goshen, with 14 units at Lincoln West Apartments and 15 units at Westplains Apartments. PSH is targeted for the chronically homeless, and is a partnership of Lacasa, the owner/developer, and Oaklawn Mental Health Center, the service provider. In program year 2019, construction began for a new PSH project in the City of Elkhart, Benham Avenue Apartments, to provide 11 new housing units and supportive services for chronically homeless. The target completion date is March 2020. Funding for the \$1.8 million project includes HOME, Housing

Trust Fund, and IHEDA Development Fund, with rental assistance provided through Shelter+Care vouchers.

Oaklawn provides vouchers for scattered site PSH, including units occupied in Goshen, designated for individuals with disabilities. PSH is also provided by AIDS Ministries/AIDS Assist at two locations in the City of Elkhart, with a total of ten beds. Permanent supportive housing has contributed to preventing chronic homelessness by providing stable housing and supportive services to individuals who otherwise might experience homelessness.

Housing Choice vouchers include NED (non-elderly disabled) vouchers for persons with disabilities, with NED vouchers approximately 19% of current vouchers. Between the Hattle Hotel and Shoots Building, there are three ADA units. The Hawks Arts & Enterprise Center has four ADA units. The six scattered site PSH units are designated for individuals with disabilities. Of the 267 Section 8 elderly units at Greencroft Goshen, 39 are ADA units.

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

No units are expected to be lost from the affordable housing inventory.

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

In Goshen there are 13,309 housing units, of which 93.4 percent are occupied. The owner occupied vacancy rate is 1.8 percent, while the rental vacancy rate is 5.5 percent. While the vacancy rate is low in Goshen, a significant number of vacant homes are vacant for “other” reasons (meaning they are not for sale or rent). Goshen has adopted minimum housing standards, and enforces these standards for long-term vacant properties.

Although there are a range of housing sizes available, 14.9 percent of housing units in Goshen have one bedroom and 55 percent have three or more-bedrooms. All housing voucher programs currently report a high demand for one bedroom units, with few, if any, one bedroom units available. WHA reports that 63 percent of vouchers issued in 2019 were for one-person households, and 49 percent of families on the 2020 waiting list need one bedroom units.

According to 2013-2017 ACS five-year estimates, 36 percent of renter households are one-person households, compared to 20 percent of owner households, and 62 percent of renter households are one- and two-person households, indicating a need for more one-bedroom rental housing units.

**Describe the need for specific types of housing:**

The data described in the preceding section indicate a high demand for one bedroom housing units, especially for renters. Data discussed previously indicate significant cost burden for renter households,

combined with more than half of renter households qualifying as low income, which indicates a continued need for preserving existing and creating new affordable rental housing.

According to a housing study by the Joint Center for Housing Studies of Harvard University, by 2038 households age 65 and over will increase to 34 percent of all households, with the fastest growing segment being households age 80 and over. Due to the Great Recession, a significant number of households age 50 to 64 years have lower incomes and lower rates of homeownership compared to prior generations in the same age range, which will likely lead to increasing numbers of elderly renter households in need of housing assistance and supportive services. Older adults generally live alone, which with the growing number of elderly households will lead to increased demand for one bedroom housing units, along with increasing need for affordable housing with supportive services.

According to input from local housing and service providers, the existing 29 units of permanent supportive housing (PSH) in Goshen is about half of what is needed. Permanent supportive housing has contributed to preventing chronic homelessness by providing stable housing and supportive services to individuals who otherwise might experience homelessness.

## **Discussion**

The Elkhart County Housing Needs Assessment 2014 indicates that affordable housing may be provided by the market, but is more likely to occur with Low Income Housing Tax Credits (LIHTC) or other incentives. Because of the extremely competitive nature of LIHTC in Indiana, local agencies such as Lacasa are exploring other funding sources, such as HOME, and additional local funds are needed to provide gap funding.

Quality, affordable housing is needed, with the largest demand for one bedroom rental units.

Future housing development will need to include the replacement of unsafe units that are demolished, increased accessible units, renovation and rehabilitation of existing housing units, and the construction of new units.

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

## Introduction

The following information is based primarily on data from the 2013-2017 American Community Survey 5-year estimates along with information from the Elkhart County Housing Needs Assessment 2014 and from Comprehensive Housing Affordability Strategy (CHAS) data, 2012-16 ACS.

There are 12,435 households in Goshen, of which 67.1 percent are family households, 46.3 percent are married couple households, and 36.1 percent are households with children under age 18. Approximately 10.5 percent of households are headed by females who have children under 18 living at home (with no husband present). Single-person households are 27 percent of total households. The average household size is 2.59.

The median household income in Goshen is \$46,055. Approximately 6.2 percent of the households (770) have an income below \$10,000 and 1.1 percent of households have an income over \$200,000.

In Goshen, 17.3 percent of the total population and 13.6 percent of families live in poverty. Of children under 18, 25.1 percent live in poverty, and 7.1 percent of people over age 65 live in poverty. Of the Hispanic population, 35.1 percent of families live in poverty.

For owner-occupied housing units in Goshen, the median home value is \$111,000 and the median gross rent for occupied rental units is \$745. The majority of rental households in Goshen, 73.5 percent, pay \$500 to \$999 gross rent per month.

In Goshen, 22.7 percent of owner-occupied housing units with a mortgage have a housing cost burden over 30 percent of household income, with 14.9 percent having a cost burden over 35 percent.

Of renter households in Goshen, 43.6 percent spend more than 30 percent of their household income on housing, with 33.8 percent of renter households spending more than 35 percent.

In Goshen, of 12,365 households there are 5,525 renter households, a rental rate of 45 percent. Approximately 58 percent of renter households are low income (below 80 percent HAMFI), compared to 34 percent of owner households. Of total renter households, 39 percent are very low income (below 50 percent HAMFI), and 21 percent extremely low income (below 30 percent HAMFI) compared to 12 percent very low income and five percent extremely low income owner households. Several sources indicate high demand for both owner and renter housing units compared to the supply of new units being constructed.

## Cost of Housing

	Base Year: 2009	Most Recent Year: 2015	% Change
Median Home Value	103,600	111,500	8%



	<b>Base Year: 2009</b>	<b>Most Recent Year: 2015</b>	<b>% Change</b>
Median Contract Rent	603	588	(2%)

**Table 28 – Cost of Housing**

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

<b>Rent Paid</b>	<b>Number</b>	<b>%</b>
Less than \$500	2,024	38.3%
\$500-999	3,105	58.7%
\$1,000-1,499	90	1.7%
\$1,500-1,999	50	1.0%
\$2,000 or more	15	0.3%
<b>Total</b>	<b>5,284</b>	<b>99.9%</b>

**Table 29 - Rent Paid**

Data Source: 2011-2015 ACS

### Housing Affordability

<b>% Units affordable to Households earning</b>	<b>Renter</b>	<b>Owner</b>
30% HAMFI	380	No Data
50% HAMFI	1,265	400
80% HAMFI	3,265	1,925
100% HAMFI	No Data	2,854
<b>Total</b>	<b>4,910</b>	<b>5,179</b>

**Table 30 – Housing Affordability**

Data Source: 2011-2015 CHAS

### Monthly Rent

<b>Monthly Rent (\$)</b>	<b>Efficiency (no bedroom)</b>	<b>1 Bedroom</b>	<b>2 Bedroom</b>	<b>3 Bedroom</b>	<b>4 Bedroom</b>
Fair Market Rent	0	0	0	0	0
High HOME Rent	0	0	0	0	0
Low HOME Rent	0	0	0	0	0

**Table 31 – Monthly Rent**

Data Source Comments:

### Is there sufficient housing for households at all income levels?

The data discussed in preceding sections indicate a high demand for one-bedroom housing units, especially for renters. The data also indicate significant cost burden for renter households, combined with more than half of renter households qualifying as low income, which indicates a continued need for preserving existing and creating new affordable rental housing.

According to a housing study by the Joint Center for Housing Studies of Harvard University, by 2038 households age 65 and over will increase to 34 percent of all households, with the fastest growing segment being households age 80 and over. Due to the Great Recession, a significant number of households age 50 to 64 years have lower incomes and lower rates of homeownership compared to prior generations in the same age range, which will likely lead to increasing numbers of elderly renter households in need of housing assistance and supportive services. Older adults generally live alone, which with the growing number of elderly households will lead to increased demand for one-bedroom housing units, along with increasing need for affordable housing with supportive services.

According to input from local housing and service providers, the existing 29 units of permanent supportive housing (PSH) in Goshen is about half of what is needed. Permanent supportive housing has contributed to preventing chronic homelessness by providing stable housing and supportive services to individuals who otherwise might experience homelessness.

Quality, affordable housing is needed, with the largest demand for one-bedroom rental units.

Future housing development will need to include the replacement of unsafe units that are demolished, increased accessible units, renovation and rehabilitation of existing housing units, and the construction of new units.

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

The data indicate median home values and gross rents are both increasing. Median income has both declined and increased between 2013 and 2017, but housing cost burden has remained high, especially for renter households, indicating that housing is becoming less affordable over time.

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

Per 2013-2017 ACS 5-year estimates, median rent paid in Goshen is \$745 per month. 2017 Fair Market Rent (FMR) for the Elkhart-Goshen MSA for a two-bedroom unit is \$751. Since median rent is not broken down by unit size, the comparison is limited, but a significant portion of the population is likely paying rent exceeding FMR. Warsaw Housing Authority has set their rents ten percent higher than FMR to keep voucher holders in the range of rents being charged. HOME rent set by HUD in 2017 for Elkhart County was \$655 for a two-bedroom unit at 50% AMI. One of the challenges for voucher-assisted housing in Goshen is that although rents paid are comparable a significant number of rental units are managed by

rental management agencies who would have increased compliance requirements for voucher-assisted units with no additional compensation. This challenge will only become more of a barrier to affordable housing as regulations for voucher-assisted units increase, as they have been doing in recent years.

## **Discussion**

The housing problems included in the CHAS data are substandard housing (incomplete kitchen or plumbing facilities), severe overcrowding (more than 1.51 people per room), overcrowding (1.01 to 1.5 people per room), cost burden greater than 50%, and cost burden greater than 30 percent. Based on previously discussed data, substandard housing and overcrowding are not significant issues, but cost burden, especially for renter occupied units, is the most significant housing problem, with 1,262 of 6,897 owner occupied units (18%) having a cost burden of 30% or greater, and 2,278 of 5,538 renter occupied units (41%) having a cost burden of 30% or greater, per 2013-2017 ACS 5-year estimates.

The significance of cost burden is also demonstrated in the Goshen resident housing survey results for the Elkhart County Housing Needs Assessment, carried out in 2014, in which three of the top four housing problems experienced in the past two years included difficulty paying rent/mortgage, difficulty paying utilities and inability to make needed repairs/improvements to own home.

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

### **Introduction**

The housing problems included in the CHAS data are substandard housing (incomplete kitchen or plumbing facilities), severe overcrowding (more than 1.51 people per room), overcrowding (1.01 to 1.5 people per room), cost burden greater than 50%, and cost burden greater than 30 percent. According to 2013-2017 ACS five-year estimates, 268 of 12,435 occupied housing units (2.2%) lack complete kitchen facilities, 11 of 12,435 occupied housing units (0.1%) lack complete plumbing facilities, 294 of 12,435 occupied housing units (2.4%) have more than one person per room, and 1,262 of 6,897 owner occupied units (18%) have cost burden of 30% or greater, and 2,278 of 5,538 renter occupied units (41%) have cost burden of 30% or greater. As has been discussed previously, cost burden is the most significant housing problem, and when experienced by owners likely means that maintenance is deferred, resulting long-term in poor housing conditions.

In Goshen there are 13,309 housing units, of which 93.4 percent are occupied. The owner-occupied vacancy rate is 1.8 percent, while the rental vacancy rate is 5.5 percent. While the vacancy rate is low in Goshen, a significant number of vacant homes are vacant for “other” reasons (meaning they are not for sale or rent) which could be a concern. Goshen has adopted minimum housing standards, and enforces these standards for long-term vacant properties.

Worst case physical housing problems of rental properties have been addressed in the City of Goshen through the Neighborhood Preservation Ordinance (NPO), adopted in May 2002, which established minimum housing standards and continued a rental housing registration and inspection program. The City has enforced minimum standards, for occupied and vacant rental properties, which has likely contributed to the small number of occupied properties that lack complete plumbing and kitchen facilities. Enforcement for vacant properties began recently, but in the long-term should contribute to reducing the number of vacant housing units in substandard condition.

### **Definitions**

Worst case physical housing problems of rental properties are addressed in the City of Goshen through the Neighborhood Preservation Ordinance (NPO), adopted in May 2002, which established minimum housing standards and continued a rental housing registration and inspection program. The NPO contains minimum standards used to determine when repairs are required, and the City has enforced minimum standards, for occupied and vacant rental properties, which has likely contributed to the small number of occupied properties that lack complete plumbing and kitchen facilities. The City uses the NPO to define substandard housing, along with the Indiana Unsafe Building Law, Indiana Code 36-7-9. Buildings and premises that are defined as unsafe, per the NPO and Indiana Code, are those which cannot be rehabilitated and typically must be demolished.

## Condition of Units

Condition of Units	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
With one selected Condition	1,400	21%	2,110	40%
With two selected Conditions	60	1%	255	5%
With three selected Conditions	0	0%	0	0%
With four selected Conditions	0	0%	0	0%
No selected Conditions	5,280	78%	2,925	55%
<b>Total</b>	<b>6,740</b>	<b>100%</b>	<b>5,290</b>	<b>100%</b>

Table 32 - Condition of Units

Data Source: 2011-2015 ACS

## Year Unit Built

Year Unit Built	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
2000 or later	1,349	20%	855	16%
1980-1999	2,075	31%	1,620	31%
1950-1979	1,625	24%	1,505	28%
Before 1950	1,690	25%	1,310	25%
<b>Total</b>	<b>6,739</b>	<b>100%</b>	<b>5,290</b>	<b>100%</b>

Table 33 – Year Unit Built

Data Source: 2011-2015 CHAS

## Risk of Lead-Based Paint Hazard

Risk of Lead-Based Paint Hazard	Owner-Occupied		Renter-Occupied	
	Number	%	Number	%
Total Number of Units Built Before 1980	3,315	49%	2,815	53%
Housing Units build before 1980 with children present	1,520	23%	690	13%

Table 34 – Risk of Lead-Based Paint

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

## Vacant Units

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

Table 35 - Vacant Units

Data Source: 2005-2009 CHAS

## **Need for Owner and Rental Rehabilitation**

Because cost burden is a significant issue for owners, long-term maintenance and improvements may be deferred, resulting in deteriorating housing conditions over time. The significance of cost burden was demonstrated in the Goshen resident housing survey results for the Elkhart County Housing Needs Assessment, carried out in 2014, in which one of the top four housing problems experienced in the past two years included the inability to make needed repairs/improvements to own home.

Based on 2013-2017 ACS 5-year estimates, of total vacant housing units, 65% were for rent, for sale or rented/sold but not occupied, 11% were for seasonal/occasional use or with residence elsewhere, and 24% were vacant for other reasons. The units vacant for other reasons are 2% of the total housing units and may indicate housing units in poor/substandard condition. Although physical housing problems do not appear significant based on the CHAS data, the number of rental units that are vacant for other reasons may indicate need for repair/rehabilitation.

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

There is no data related to the number of housing units occupied by low/mod income families and the age of the housing. Based on the 2013-2017 ACS 5-year estimates, 43.7% of housing units in Goshen were built prior to 1980. Of these pre-1980 units, 53% are owner occupied and 47% are renter occupied. Of owner-occupied housing units, 5% of pre-1980 units are occupied by householders 15-34 years of age, and of renter occupied units 18% of pre-1980 units are occupied by householders 15-34 years of age, which could indicate the presence of small children.

## **Discussion**

As a way to address housing issues, to preserve and create affordable housing, and to expand housing options, the City of Goshen will continue to provide support for a variety of housing options and assistance, including emergency shelter, transitional housing, permanent supportive housing, housing choice vouchers, homeownership programs, housing rehabilitation for both owner-occupied and renter-occupied units, acquisition-rehabilitation programs, rental property improvement through code enforcement, and new affordable housing projects.

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

### Introduction

There are no public housing units within the City of Goshen. The City of Goshen works with Warsaw Housing Authority (WHA), Lacasa, Oaklawn Mental Health Center, Greencroft Goshen, Habitat for Humanity, Council on Aging, City of Elkhart, Elkhart County, and other local organizations to address housing and related needs. Goshen Housing Authority was dissolved in November 2018, and Goshen vouchers were absorbed by WHA. WHA tracks and reports Goshen vouchers separately at the local level, but HUD considers all vouchers as WHA vouchers. The Goshen vouchers absorbed by WHA are not reflected in the auto-filled PIC data. WHA does not maintain any properties. As of December 1, 2019, there were 338 Housing Choice Vouchers under lease, including 173 Goshen vouchers, and 24 vouchers granted but not yet under lease. Of the 173 Goshen vouchers, approximately 19% were NED (non-elderly disabled) vouchers for persons with disabilities. In mid-February 2020, there were 278 people on the waiting list for Goshen vouchers, with 112 local and 166 who do not live or work in Goshen. Housing Choice Vouchers are portable between housing authorities, but individual housing authorities may adopt a residency preference in addition to other local preferences and the HUD criteria for eligibility. WHA has adopted a residency preference, which for Goshen includes living or working in Goshen city limits.

**Please note: Auto-filled PIC data does not reflect the absorption of Goshen vouchers by WHA.**

### Totals Number of Units

	Program Type								
	Certificate	Mod-Rehab	Public Housing	Vouchers					
				Total	Project -based	Tenant -based	Special Purpose Voucher		
						Veterans Affairs Supportive Housing	Family Unification Program	Disabled *	
# of units vouchers available				175			0	0	0
# of accessible units									
<b>*includes Non-Elderly Disabled, Mainstream One-Year, Mainstream Five-year, and Nursing Home Transition</b>									

**Table 36 – Total Number of Units by Program Type**

Data Source: PIC (PIH Information Center)

**Describe the supply of public housing developments:**

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

There are no public housing units in Goshen. The Housing Choice voucher program is operated by Warsaw Housing Authority (WHA). Based on information provided by WHA, there are currently 42 Goshen landlords participating, ranging from one unit in the program to a complex with 31 units in the program. The multi-family units are in the best condition, as most were constructed using federal or state funding and are inspected by other entities on an annual basis. Older, single family homes tend to have chipping or scaling paint, along with electrical systems that do not meet current code requirements. Failing and damaged units cost time and money that could be better spent elsewhere, with damages by tenants resulting in landlords hesitant to rent to other Housing Choice voucher participants.



## Public Housing Condition

Public Housing Development	Average Inspection Score

Table 37 - Public Housing Condition

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

There are no public housing units in Goshen.

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

There are no public housing units in Goshen. Warsaw Housing Authority (WHA) operates a Housing Choice voucher program, including vouchers for Goshen, which were absorbed when Goshen Housing Authority was dissolved in 2018. WHA works closely with other agencies who provide services for low- and moderate-income families, and have been working with volunteers in Goshen who are providing case management. WHA operates a Good Housekeeping Award program, initiated in 2015, to promote pride in housing and to encourage tenants to keep units clean and immediately report maintenance issues rather than waiting for an inspection. In 2019 nearly 70% of WHA clients received a Good Housekeeping award. WHA is also incorporating “best practices” to help educate and recruit landlords.

### Discussion:

There are no public housing units within the City of Goshen. The City of Goshen works with Warsaw Housing Authority (WHA), Lacasa, Oaklawn Mental Health Center, Greencroft Goshen, Habitat for Humanity, Council on Aging, City of Elkhart, Elkhart County, and other local organizations to address housing and related needs. The City and local community have provided strong support for the Housing Choice voucher program in the past few years when Goshen Housing Authority faced financial crisis. Although the City adopted an additional appropriation to provide funds to cover a reserve shortfall, supported by several hours of public testimony in support of keeping Housing Choice vouchers in Goshen, the financial situation was not able to be resolved with HUD and Goshen Housing Authority was dissolved in late 2018, with Goshen vouchers absorbed by WHA.

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

### Introduction

Emergency shelter in Elkhart County is provided by Faith Mission, primarily serving homeless individuals, Goshen Interfaith, serving homeless families with children and single women, and by the YWCA Safe Haven women's shelter, serving victims of domestic violence. Transitional housing is provided by Emerge Ministries and SPA ministries. Permanent supportive housing is provided by AIDS Ministries and Oaklawn Mental Health Center.

### Facilities and Housing Targeted to Homeless Households

	Emergency Shelter Beds		Transitional Housing Beds	Permanent Supportive Housing Beds	
	Year Round Beds (Current & New)	Voucher / Seasonal / Overflow Beds	Current & New	Current & New	Under Development
Households with Adult(s) and Child(ren)	82	0	17	0	0
Households with Only Adults	95	0	0	0	0
Chronically Homeless Households	0	0	0	29	11
Veterans	0	0	0	0	0
Unaccompanied Youth	0	0	0	0	0

**Table 38 - Facilities and Housing Targeted to Homeless Households**

Data Source Comments:

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

Permanent supportive housing (PSH) targeted to chronically homeless individuals has been developed in Goshen through a partnership of Lacasa, owner/developer, and Oaklawn Mental Health Center, service provider, with a 14-unit PSH project, Lincoln West Apartments, completed in March 2012, and a 15-unit PSH project, Westplains Apartments, completed in January 2014. A new 11-unit PSH project by Lacasa and Oaklawn is under construction in the City of Elkhart, with occupancy expected to begin in April 2020.

No mainstream services are specifically targeted to homeless persons, but through the Continuum of Care agencies providing services to homeless persons are networking with other service providers and have access to information about community resources/services. Service providers are making referrals based on the information they have, but better communication about available services is needed.

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

Emergency shelter in Elkhart County is provided by Faith Mission, primarily serving homeless individuals, Goshen Interfaith, serving homeless families with children and single women, and by the YWCA Safe Haven women's shelter, serving victims of domestic violence. Transitional housing is provided by Emerge Ministries and SPA ministries. Permanent supportive housing is provided by AIDS Ministries and Oaklawn Mental Health Center.

Permanent supportive housing (PSH) targeted to chronically homeless individuals has been developed in Goshen through a partnership of Lacasa, owner/developer, and Oaklawn Mental Health Center, service provider, with a 14-unit PSH project, Lincoln West Apartments, completed in March 2012, and a 15-unit PSH project, Westplains Apartments, completed in January 2014. A new 11-unit PSH project by Lacasa and Oaklawn is under construction in the City of Elkhart, with occupancy expected to begin in April 2020.

The Indiana Region 2 Continuum of Care accomplished the goal of functional zero for veteran homelessness in September 2018, and submitted an application to USICH (US Interagency Council on Homelessness) in December 2018. The local VA along with local agencies led the effort, including VA Northern Indiana Healthcare System (VA NIHCS) Oaklawn, Faith Mission, Elkhart Housing Authority, City of Elkhart, WorkOne (Region 2 Disabled Veteran Outreach Program Specialist), Veterans' Service Officers for Elkhart, Marshall, Fulton, and Kosciusko counties, and Brightpoint (Supportive Services for Veterans Families provider). Monthly meetings are held to identify and discuss any homeless veterans in Region 2 and names are added to the Region 2 Veteran By Name List. These meetings have been held on a monthly basis since September 2016. Ending veteran homelessness is also discussed at the bi-monthly Region 2 Homeless Coalition meetings.

The VA NIHCS homeless team and the Oaklawn PATH team do monthly outreach to food pantries, local service providers and drop in centers for the purpose of identifying homeless veterans. The largest shelter in Region 2, Faith Mission, has also been attempting to identify any veterans in their facility. Faith Mission asks all residents and people participating in the weather amnesty program if they have served in the Armed Forces upon check in to the facility. The Veteran By Name List has been a helpful tool in identifying, tracking and housing veterans in Region 2. There have also been a number of Stand Down events held in Region 2 in an effort to identify homeless veterans and increase awareness among agencies of homeless services available in Region 2. The VA NIHCS homeless team works closely with and is on site at least monthly at Faith Mission. VA posters containing contact information for the VA homeless hotline have also been distributed to local services providers in an effort to increase awareness. Oaklawn, the area's largest mental health provider, has the PATH program which also helps identify homeless veterans who are then referred to the By Name List. VA NIHCS also continues to give presentations in the local community as a form of outreach and to increase awareness.

Advocacy, education and coordination of housing and homeless programs in Indiana is managed by the Indiana Housing & Community Development Authority (IHCDA), through the regional Continuum of Care (CoC) network. Goshen, located in Elkhart County, is part of Region 2 CoC, and actively participates with the Indiana Region 2 Homeless Coalition, which meets bi-monthly. Goshen's CDBG administrator serves on the executive committee of the CoC. The City of Goshen does not expect to receive any direct public or private funding in program year 2020 to address homeless needs and to prevent homelessness.

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

### **Introduction**

Input from service providers was obtained through meetings, direct contact, and through review of agency annual reports, related to non-homeless special needs, including elderly, frail elderly, victims of domestic violence, persons with disabilities (mental, physical, developmental), persons with alcohol/drug addictions, and persons with HIV/AIDS. Persons being released from jail/prison, and individuals with felonies, also have special needs, as employment, housing and services may be difficult to obtain.

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

Based on input from service providers, special needs populations are generally in need of housing assistance combined with supportive services, including assistance in navigating procedures in order to obtain housing. Access to employment, housing and health care are crucial for the special needs populations, and job training, mentoring and skill development programs are essential. Many in the special needs population have been homeless or may be at risk of becoming homeless, and long-term supportive services, combined with housing assistance, may be required to provide stability and increase self-sufficiency. Individuals with a combination of needs are the most difficult to serve, as their cases are complex and may require services from a number of agencies.

Housing and supportive service needs are determined by the local agencies serving special needs populations. Based on input from these agencies, access to employment, housing and health care are crucial for individuals with special needs, and job training, mentoring and skill development programs are essential. The elderly population has a high need for transportation, and the frail elderly may need case management services, including assistance with routine tasks such as grocery shopping, cleaning and meal preparation.

Many in the special needs population have been homeless or may be at risk of becoming homeless, and long-term supportive services, combined with housing assistance, may be required to provide stability and increase self-sufficiency. Supervised group living, including transition from in-patient mental health facilities, is a high need. Very few resources are available for the staff needed for group housing, and home assistance services are understaffed. Although the incidence of homelessness among special needs clients has declined since permanent supportive housing (PSH) opened for individuals with chronic mental illness, there is still a need for twice the existing number of PSH units in Goshen.

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

Oaklawn Mental Health Center provides supervised group living opportunities for persons being discharged from in-patient mental health treatment.

At the present time, there is not a coordinated discharge policy in place for Elkhart County. In the past, this has been discussed at the Indiana Region 2 Homeless Coalition and will continue to be a goal that is pursued. Previously, the Indiana Coalition on Housing and Homeless Issues, now subsumed through IHADA, developed an action plan to end chronic homelessness, which included a strategy to ensure that individuals are not released from institutions into homelessness. This plan was presented and discussed at the Indiana Region 2 Homeless Coalition.

For the past few years, the Elkhart County Sheriff's Department has coordinated a re-entry initiative, Elkhart County Reentry Initiative (ECRI). The goal is to reduce recidivism, which is estimated at 30-70% for Elkhart County, which has 700 inmates per year coming back to Elkhart County from prison. The reentry initiative is intended to facilitate networking with resources, to help remove barriers to successful reentry. Some of the challenges faced by individuals returning to the community from prison are employment, education, housing, transportation, access to resources, health (addictions/mental illness/physical), accountability and a changing world. ECRI is providing training for mentors, accountability partners or transitional coaches to help individuals with reentry challenges.

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

The system to address the housing and supportive services needs for persons who are not homeless but have other special needs operates mostly informally through the cooperation of local agencies providing housing and services, and formally through the Indiana Region 2 Homeless Coalition (the local Continuum of Care). Goshen's CDBG administrator serves on the CoC executive committee, and will continue to regularly participate with this group. Support will also continue for local agencies providing services for persons with special needs, including prevention of homelessness, outreach, case management, transitional housing and permanent supportive housing.

Because of limited CDBG funding, the non-homeless special needs population will be primarily served outside of the CDBG-funded programs. Local agencies providing these services include ADEC, AIDS Ministries, Church Community Services, Council on Aging, Elkhart County Clubhouse, Elkhart Township Trustee, Emerge Ministries, Goodwill Industries, Greencroft Goshen, Lacasa, Oaklawn Mental Health Center, REAL Services, Warsaw Housing Authority, and YWCA of Northern Indiana. These populations are currently fairly well served and there are simply no additional CDBG resources available to be directed specifically toward these populations.

A small portion of these populations, such as elderly and physically disabled homeowners, will be assisted through the owner-occupied housing rehabilitation program and through neighborhood-based community development efforts. Additional assistance is provided through the NED (non-elderly disabled) Housing Choice vouchers for persons with disabilities administered by Warsaw Housing Authority.

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

The system to address the housing and supportive services needs for persons who are not homeless but have other special needs operates mostly informally through the cooperation of local agencies providing housing and services, and formally through the Indiana Region 2 Homeless Coalition (the local Continuum of Care). Goshen's CDBG administrator serves on the CoC executive committee, and will continue to regularly participate with this group. Support will also continue for local agencies providing services for persons with special needs, including prevention of homelessness, outreach, case management, transitional housing and permanent supportive housing.

Because of limited CDBG funding, the non-homeless special needs population will be primarily served outside of the CDBG-funded programs. Local agencies providing these services include ADEC, AIDS Ministries, Church Community Services, Council on Aging, Elkhart County Clubhouse, Elkhart Township Trustee, Emerge Ministries, Goodwill Industries, Greencroft Goshen, Lacasa, Oaklawn Mental Health Center, REAL Services, Warsaw Housing Authority and YWCA of Northern Indiana. These populations are currently fairly well served and there are simply no additional CDBG resources available to be directed specifically toward these populations.

A small portion of these populations, such as elderly and physically disabled homeowners, will be assisted through the owner-occupied housing rehabilitation program and through the neighborhood-based community development efforts. Additional assistance is provided through the NED (non-elderly disabled) Housing Choice vouchers for persons with disabilities administered by Warsaw Housing Authority.

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

### **Negative Effects of Public Policies on Affordable Housing and Residential Investment**

As a way to remove barriers to affordable housing, the City has provided tax phase-ins, grants, loans and assistance for projects which have rehabilitated deteriorating housing or redeveloped brownfield sites, creating affordable housing for low and moderate income persons. The City also provided a loan to Lacasa to be used in Lacasa's Revolving Real Estate Development Fund, which was established with the intent to acquire, rehabilitate and return to homeownership run-down, often vacant, investment properties. Within neighborhoods, residents often cite vacant and dilapidated properties as a major concern, and this fund seeks to address the worst of these problem properties. Potential homebuyers have access to Lacasa's homeownership classes, financial training, and a matched savings program.

The City has also partnered with local agencies and other units of local government to pursue grant funding, such as a successful Neighborhood Stabilization Program Round 1 (NSP1) grant, to develop affordable housing.

The City is not aware of any local ordinances or policies which create unreasonable barriers to affordable housing. The City will continue to explore incentives and opportunities available for the development of affordable housing, and will continue to use local public resources for infrastructure improvements to enhance living conditions in low/moderate income neighborhoods. Efforts will continue to preserve existing affordable housing and create new affordable housing, through housing rehabilitation and new construction.



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

### Introduction

According to ACS data for the City of Goshen, the manufacturing sector accounts for 48 percent of the share of workers and 50 percent of the share of jobs. Second to the manufacturing sector in number of workers is education and health care services (14 percent), followed by retail trade (9 percent) and arts/entertainment/accommodations (8 percent). Together, these sectors combined account for 85 percent of the total jobs in the City. Sectors with higher than average wages where the City is lacking include: information; finance/insurance/real estate; and professional/scientific/management services. These represent zero, three, and three percent of the share of jobs, respectively. On a local and regional level, there is a recognized need for greater diversification of the economy.

### Economic Development Market Analysis

#### Business Activity

Business by Sector	Number of Workers	Number of Jobs	Share of Workers %	Share of Jobs %	Jobs less workers %
Agriculture, Mining, Oil & Gas Extraction	64	37	0	0	0
Arts, Entertainment, Accommodations	1,049	1,805	8	7	-1
Construction	356	520	3	2	-1
Education and Health Care Services	1,776	3,919	14	16	2
Finance, Insurance, and Real Estate	442	770	3	3	0
Information	107	81	1	0	-1
Manufacturing	6,296	12,292	49	50	1
Other Services	322	493	2	2	0
Professional, Scientific, Management Services	561	821	4	3	-1
Public Administration	0	0	0	0	0
Retail Trade	1,201	2,808	9	11	2
Transportation and Warehousing	240	260	2	1	-1
Wholesale Trade	478	677	4	3	-1
Total	12,892	24,483	--	--	--

**Table 39 - Business Activity**

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

## Labor Force

Total Population in the Civilian Labor Force	15,366
Civilian Employed Population 16 years and over	14,140
Unemployment Rate	8.04
Unemployment Rate for Ages 16-24	18.37
Unemployment Rate for Ages 25-65	5.45

**Table 40 - Labor Force**

Data Source: 2011-2015 ACS

Occupations by Sector	Number of People
Management, business and financial	1,960
Farming, fisheries and forestry occupations	580
Service	1,338
Sales and office	2,910
Construction, extraction, maintenance and repair	1,428
Production, transportation and material moving	2,033

**Table 41 – Occupations by Sector**

Data Source: 2011-2015 ACS

## Travel Time

Travel Time	Number	Percentage
< 30 Minutes	11,385	84%
30-59 Minutes	1,975	15%
60 or More Minutes	195	1%
<b>Total</b>	<b>13,555</b>	<b>100%</b>

**Table 42 - Travel Time**

Data Source: 2011-2015 ACS

## Education:

### Educational Attainment by Employment Status (Population 16 and Older)

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Less than high school graduate	2,345	225	1,460
High school graduate (includes equivalency)	3,510	310	1,120
Some college or Associate's degree	2,770	288	640

Educational Attainment	In Labor Force		Not in Labor Force
	Civilian Employed	Unemployed	
Bachelor's degree or higher	2,705	30	430

**Table 43 - Educational Attainment by Employment Status**

Data Source: 2011-2015 ACS

### Educational Attainment by Age

	Age				
	18–24 yrs	25–34 yrs	35–44 yrs	45–65 yrs	65+ yrs
Less than 9th grade	45	415	310	670	575
9th to 12th grade, no diploma	921	865	770	1,000	385
High school graduate, GED, or alternative	935	1,510	1,125	2,305	1,790
Some college, no degree	1,255	943	640	1,260	780
Associate's degree	85	245	240	380	175
Bachelor's degree	78	570	480	1,100	545
Graduate or professional degree	0	140	205	660	680

**Table 44 - Educational Attainment by Age**

Data Source: 2011-2015 ACS

### Educational Attainment – Median Earnings in the Past 12 Months

Educational Attainment	Median Earnings in the Past 12 Months
Less than high school graduate	23,688
High school graduate (includes equivalency)	58,957
Some college or Associate's degree	70,833
Bachelor's degree	93,527
Graduate or professional degree	49,542

**Table 45 – Median Earnings in the Past 12 Months**

Data Source: 2011-2015 ACS

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

Based on the Business Activity table, the City of Goshen's major employment sectors include manufacturing, education and health care services, and retail trade. In terms of share of jobs, these comprise 50, 16, and 11 percent, respectively. Together, these three sectors represent 78 percent of all jobs in the City of Goshen. According to Bureau of Labor Statistics (OES data) from May 2018, the Elkhart-Goshen MSA is the most highly concentrated MSA in the United States for production

occupations jobs. Manufacturing in the Elkhart-Goshen MSA is largely concentrated in recreational vehicles and manufactured housing.

**Describe the workforce and infrastructure needs of the business community:**

In terms of infrastructure, the development of a low-cost, accessible fiber network is needed to facilitate the growth of entrepreneurial and knowledge-based firms in the downtown and citywide. While fiber is currently available, it is expensive, particularly for small businesses. The City of Goshen and specifically, the industrial parks located on the City's southeast side, lacks a direct connection to the Indiana Toll Road (I-80/90). The City currently has a shortage of sites with infrastructure (water, sewer, access) that are available for industrial development, and this is a serious concern as it may limit industrial growth in the future, which could also impact retention of existing industries. The existing site inventory is diminishing rapidly.

Based on ACS data, 21 percent of Goshen's civilian employed labor force does not have a high school diploma and/or equivalency, indicating a need for adult basic education and workforce training. According to the Indiana Department of Workforce Development's *Real-Time Job Demand* report for the fourth quarter of 2019, the top three industries advertising for jobs in Economic Growth Region 2, which includes Elkhart County, were health care/social assistance, retail trade, and manufacturing.

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

In 2013, a uniform policy for tax phase-ins was adopted by the City of Goshen, City of Elkhart, and Elkhart County. The goal of the county-wide policy was to process abatements uniformly with a single application, fee structure, and policy. This policy requires that a minimum of 70 percent of new jobs created by an economic development project are above the Elkhart County median wage. The median wage is benchmarked for Bureau of Labor Statistics, Occupational Employment Statistics (OES) for the most current data available. The uniform tax phase-in policy aims to raise the median wage in Elkhart County by granting abatements for companies that provide above median wages.

Goshen's five-year capital plan identifies a number of infrastructure projects that will positively affect the local manufacturing community, including a drainage project in Goshen Industrial Park and roadway projects near the industrial parks located on the City's southeast side. Recent intersection improvements at Kercher Road and US 33, and roadway improvements nearly completion along Kercher Road between the railroad and US 33, when completed, will improve traffic and circulation to/from the industrial parks for distribution and material moving, as well as employees.

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

Goshen's educational attainment rates are lower than the State of Indiana and United States (US), based on a comparison of ACS 2013-2017 5-year estimates for the population 35 to 44 years of age, with the rate of high school graduate or higher at 88.1% for the US, 89.5% for Indiana, and 79.3% for Goshen. Additionally, in the same age range only 20.4% of Goshen residents have a bachelor's degree or higher, compared to 29.1% for the State of Indiana, and 34.8% for the US.

The Indiana Department of Workforce Development (DWD) provides workforce and economic data for Indiana's Economic Growth Regions. The City of Goshen is located in the Economic Growth Region 2, which includes St. Joseph, Elkhart, Marshall, Kosciusko and Fulton Counties. According to Labor Market Review reports for Region 2 for 2019, the most frequently listed job openings included production workers, home health aides, registered nurses, production helpers, and laborers/material handlers. The most frequently listed jobs, as determined by the Indiana DWD, are somewhat aligned with the educational attainment and skills of the local workforce. The majority of the jobs listed require a high school diploma, but no postsecondary education.

Availability of jobs that require postsecondary education in Region 2 is severely lacking. According to the Indiana DWD's Real-Time Job Demand for the fourth quarter of 2019, the only occupation requiring postsecondary education among the top occupations with job ads was nurses.

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

- **WorkOne Northern Indiana** (Elkhart County), 430 Waterfall Drive, Elkhart, IN. WorkOne is a WIA Title-1 funded program that provides employer, job seeker (including Veterans), and youth workforce training for the Elkhart region.
- **Elkhart Community Schools**, 2720 California Rd, Elkhart, IN. Elkhart Community Schools offers continuing education for all ages, adult education/high school equivalency classes, and English as a Second Language, as well as other programs and resources for area residents.
- **Goshen Public Library**, 601 S 5th St, Goshen, IN. The Goshen Public Library provides one-on-one computer training and electronic resources related to resume writing, career exploration and exams (educational, professional and certifications). The library, in partnership with the Indiana Bureau of Motor Vehicles (BMV), also offers BMV practice tests.
- **Goshen College**, 1700 S Main St, Goshen, IN. Goshen College offers a number of professional development and continuing education programs including adult English language classes and computer coding/programming. The Goshen College Center for Business and Entrepreneurial Education offers a number of educational and professional development programs to support the local business community, including Developing Supervisory Leadership, a program for newly appointed supervisors of non-management employees and working professionals. Participants are predominately employed local at manufacturing and construction companies.
- **Ivy Tech Community College**, 22531 Co Rd 18, Goshen, IN. Ivy Tech's offerings include advanced automation and robotics technology, health information technology, and manufacturing

production/operations. Ivy Tech has a number of degree programs that include eligibility to transfer to any public four-year institution in Indiana. Ivy Tech also offers customized training, assessment and professional development for the local workforce.

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

Yes

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

The region's CEDS is developed and managed by Michiana Area Council of Governments (MACOG), the Metropolitan Planning Organization (MPO) for the North Central Indiana region. MACOG's CEDS 2020-2024 was adopted on January 8, 2020. Counties within the MACOG region include St. Joseph, Elkhart, Marshall and Kosciusko. Additionally, the City of Goshen is served by the Elkhart County Economic Development Corporation (EDC), a non-profit economic development organization whose primary objectives are the expansion of local businesses, attraction of new businesses, and local entrepreneurial development.

Under the leadership of the Regional Partnership, representatives of St. Joseph, Elkhart, and Marshall counties developed a multi-jurisdictional economic development vision and strategy. This strategy was developed as part of the Indiana Economic Development Corporation's (IEDC) Regional Cities Initiative. The Regional Cities Initiative emphasizes the importance of quality of place, talent attraction and regional collaboration in an economic development strategy. The five components of the economic development strategy are industry, entrepreneurship, workforce, talent and inclusion.

In addition to the Regional Cities Initiative, the City of Goshen's Comprehensive Plan & Community Vision 2025 includes economic development goals of:

**E-1:** Work to diversify the local economy

**E-2:** Support the development and recruitment of a skilled and competitive workforce

**E-3:** Support the development of small, locally-owned businesses

**E-4:** Provide essential infrastructure to facilitate economic growth

**E-5:** Encourage vibrant, accessible employment districts

**E-6:** Encourage business practices that have positive social impacts on the community

**E-7:** Promote sustainable practices in business and industry

**E-8:** Promote travel and tourism in Goshen

These economic development efforts and goals are related to CDBG Consolidated Plan efforts, such as reducing housing cost burden through higher paying jobs, providing education and skill development, and providing adequate, safe and affordable housing.

## **Discussion**

In terms of jobs in production occupations, the Elkhart-Goshen MSA is the most highly concentrated MSA in the United States, with a location quotient of 6.41, according to Bureau of Labor Statistics data. This means that the Elkhart-Goshen MSA is 6.41 times more concentrated in production occupations than the national average.

Goshen's educational attainment rates are lower than the State of Indiana and United States (US), based on a comparison of ACS 2013-2017 5-year estimates for the population 35 to 44 years of age, with the rate of high school graduate or higher at 88.1% for the US, 89.5% for Indiana, and 79.3% for Goshen. Additionally, in the same age range only 20.4% of Goshen residents have a bachelor's degree or higher, compared to 29.1% for the State of Indiana, and 34.8% for the US. In order to meet the workforce needs of existing businesses and move toward a more diversified economy, workforce training and higher educational attainment rates are necessary.

In terms of current commuting patterns, data from the 2013-17 ACS 5-year estimates indicate 85 percent of the Goshen population has a commute time of less than 30 minutes, while 13 percent has a commute time of 30-59 minutes, and 2 percent commutes 60 or more minutes to work. This indicates that the majority of the Goshen's population (98 percent) works locally or in the Elkhart-Goshen MSA and South Bend-Mishawaka MSA.



## **MA-50 Needs and Market Analysis Discussion**

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

The 2013-2017 ACS 5-year estimates by block group were reviewed for the four housing problems of lacking complete kitchen facilities, lacking complete plumbing facilities, more than one person per room, and cost burden exceeding 30 percent. Cost burden data were available by owner units only. In evaluating multiple housing problems, concentration is defined as greater than 75% of a total, and there are no block groups that meet this criteria. Out of 24 block groups, the data show 12 block groups with multiple housing problems (50%). The one block group with all four housing problems, Census Tract 502, Block Group 3, has 4% of units lacking complete kitchen facilities, 1% of units lacking complete plumbing facilities, 1% of owner units with more than one person per room, and 17% of owner units with cost burden exceeding 30 percent. This area is an older neighborhood with predominately small houses and is 54% owner occupied. Cost burden is the most significant housing problem for owner units, occurring in every block group, ranging from two percent of housing units in the lowest block group to 42 percent of housing units in the highest block group. Of the seven CDBG income eligible block groups, five have high rates of cost burden among owner units, at 22 percent, 32 percent, 37 percent, 40 percent, and 42 percent.

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

Census 2010 block group data were reviewed for race and Hispanic/Latino origin. The overall population is 78.2% white, 2.6% Black/African American, 0.5% American Indian/Alaska Native, 1.2% Asian, 14.8% some other race, 2.7% two or more races, and 28.1% Hispanic/Latino. Block group data do not show a concentration (more than 15% above the overall population rate) of racial or ethnic minorities in any block groups.

Based on the 2019 low/mod income summary data (LMISD) released by HUD for CDBG, effective April 1, 2019, there are seven block groups in Goshen with low/mod income population of 51% or greater. These areas are "income eligible" for CDBG area-based activities. The income-eligible areas are Census Tract 1, Block Group 2, Census Tract 2, Block Group 1, Census Tract 2, Block Group 3, Census Tract 2, Block Group 4, Census Tract 3.02, Block Group 2, Census Tract 3.02, Block Group 3 and Census Tract 5.02, Block Group 1. Five of the seven block groups are older neighborhoods near the central city, one is a neighborhood developed in the 1950s and one is a mix of mid-50s and newer housing.

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

The median home value of owner-occupied housing units was reviewed by block group using the 2013-2017 ACS 5-year estimates. The data show a median home value ranging from a low of \$68,800 to a high of \$181,800. Three of the seven income eligible block groups have a median home value in the low

range (all \$85,000 or lower) while one income eligible block group has a median home value of \$143,300. This is the block group with the newest housing stock.

**Are there any community assets in these areas/neighborhoods?**

Five of the seven income eligible block groups have active neighborhood associations, and the majority have parks or bike paths. Within the income eligible block groups there are schools, non-profit community agencies, a mental health provider, primary health care clinics, retirement community, college, active business district, industrial park and brownfield redevelopment projects, including new development of affordable and market rate housing.

**Are there other strategic opportunities in any of these areas?**

The existing neighborhood assets provide opportunities for ongoing engagement and investment to address housing issues, improve infrastructure, continue brownfield redevelopment, support services to low/mod income families and individuals, and to strengthen neighborhood associations.

## **MA-60 Broadband Needs of Housing occupied by Low- and Moderate-Income Households - 91.210(a)(4), 91.310(a)(2)**

### **Describe the need for broadband wiring and connections for households, including low- and moderate-income households and neighborhoods.**

Based on information at broadbandnow.com, Goshen has two types of internet, coaxial cable with 82.6% availability and DSL with 90.29% availability. Based on 2013-2017 ACS 5-year estimates, 79.8% of Goshen households have one or more types of computing devices, with 70.8% of households having an internet subscription, and 69.2% having a broadband subscription. Income and broadband access have some correlation, as follows:

- 48.2% of households with less than \$20,000 annual household income have a broadband subscription
- 66.4% of households with \$20,000 to \$74,999 annual household income have a broadband subscription
- 94.0% of households with more than \$75,000 annual household income have a broadband subscription

The 2013-2017 ACS 5-year estimates were reviewed by block group, and of total households the households with a broadband subscription ranged from a low of 50% to a high of 96 percent, with the seven income eligible block groups as follows: 50%, 67%, 74%, 76%, 81%, 86%, and 91 percent. Based on this data, low/moderate income block groups have the same range of broadband subscriptions as compared to all block groups in the City of Goshen.

### **Describe the need for increased competition by having more than one broadband Internet service provider serve the jurisdiction.**

Based on information at broadbandnow.com, “The average home in Goshen will have 5 companies at their location, or precisely 5.86 ISPs per census block area. Only 20.89 percent of Goshen residents have one or fewer options for home broadband service.” In Goshen there are a total of 23 internet providers, with 13 offering residential service.

## **MA-65 Hazard Mitigation - 91.210(a)(5), 91.310(a)(3)**

### **Describe the jurisdiction's increased natural hazard risks associated with climate change.**

In February 2018 the City of Goshen experienced historic river flooding due to warming temperatures that melted a large amount of snow concurrent with heavy rain. This pattern is likely to be repeated as winter temperatures fluctuate widely and winter rain becomes more frequent.

### **Describe the vulnerability to these risks of housing occupied by low- and moderate-income households based on an analysis of data, findings, and methods.**

The regulatory floodplain boundaries from FEMA Flood Insurance Rate Maps were reviewed, as these are the areas adjacent to rivers, streams and other waterways most likely to experience flooding. There is regulatory floodplain located in five of the seven CDBG income eligible block groups, but there are very few residential structures in these block groups actually located in the regulatory floodplain. Based on the experience during the February 2018 flood, when all flood damaged structures were reviewed, the damaged residential structures were most likely to be structures built prior to the City's adoption of flood control district regulations in the 1970s. New residential construction is not permitted in the regulatory Floodway, and would only be permitted in non-Floodway areas if properly elevated.

# Strategic Plan

## SP-05 Overview

### Strategic Plan Overview

**Geographic Priorities:** CDBG priorities will be implemented in the 7 income eligible Census block groups based on need for investment and availability of local funds.

**Priority Needs:** The priority needs of 1) Housing Opportunities, 2) Access to Services, and 3) Neighborhood Revitalization, were identified through the citizen participation process.

**Influence of Market Conditions:** Based on 2012-2016 CHAS data, out of 12,365 total households, 28% or 3,505 households, were experiencing housing problems. Of these 2,220 households (63%) were renters, and 1,285 households (37%) were homeowners. The data indicate 55% of total households are owners and 45% are renters. Of total households, 12% (1,485) have household income  $\leq$ 30% HAMFI, 12% (1,505) have household income 31-50% HAMFI, 21% (2,540) have household income 51-80% HAMFI, and 55% (6,840) have household income greater than 80% HAMFI.

**Anticipated Resources:** CDBG funding is estimated using a \$250,000 annual entitlement grant, \$15,000 miscellaneous income and \$20,000 prior year resources, for an annual budget of \$285,000. Based on past proposals, such as HUD's Moving CDBG Forward initiative, the City expects it could lose its entitlement grant in the future, as it will likely fall below a proposed minimum threshold.

**Institutional Delivery Structure:** Strong partnerships between public, private, non-profit and institutional groups in Goshen, within the CoC and between Goshen and Elkhart City CDBG programs ensure consistent implementation.

**Goals:** The broad CDBG goals are: 1) Public facilities & improvements; 2) Public service grants; 3) Homeless facilities; 4) Housing rehabilitation, single and multi unit; 5) Housing construction; and 6) homeownership assistance.

**Public Housing:** There are no public housing units in Goshen. The City will continue to work with Warsaw Housing Authority, Lacasa, Oaklawn, Greencroft, Habitat for Humanity, Council on Aging, City of Elkhart, Elkhart County, and others to address housing needs.

**Barriers to Affordable Housing:** The City is not aware of any local ordinances or policies which create unreasonable barriers to affordable housing. The City will continue to explore incentives and opportunities available for the development of affordable housing, and will continue to use local public resources for infrastructure improvements to enhance living conditions in low/mod income neighborhoods. Efforts will continue to preserve existing affordable housing and create new affordable housing, through housing rehabilitation and new construction.

Homelessness Strategy: Advocacy, education and coordination of housing and homeless programs in Indiana is managed by IHCD, through the regional CoC network. Goshen, located in Elkhart County, is part of Region 2 CoC, and actively participates with the CoC, which meets bi-monthly. Goshen's CDBG administrator serves on the executive committee. Goshen does not expect to receive any direct public or private funding to address homeless needs and to prevent homelessness.

Lead-Based Paint Hazards: The City and Lacasa will continue to inspect for and address lead paint hazards in the housing rehab program, and will provide participants with information regarding lead paint hazards. The City will also work with the Elkhart County Health Department to address lead-based paint hazards.

Anti-Poverty Strategy: The antipoverty strategy is a component of each community development and housing objective, and assumes the most effective tools for reducing poverty are education, training and access to supportive services. These are the components of housing rehab, public service grants, and neighborhood-based community development efforts.

Monitoring: Long-term compliance with program requirements is ensured by mandatory pre-application meetings with sub-recipients, required reporting and on-site monitoring of sub-recipient activities.

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

### **Geographic Area**

**Table 46 - Geographic Priority Areas**

#### **General Allocation Priorities**

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

Of the 38 Census tracts that make up Elkhart County, ten Census tracts (1, 2, 3.01, 3.02, 4, 5.01, 5.02, 6, 13 and 20) are located within or partially within Goshen city limits. Based on the 2019 low/mod income summary data (LMISD) released by HUD for CDBG, effective April 1, 2019, four Census tracts, 1, 2, 3.02 and 5.02, contain the highest percentage of low/mod income population, with a total of 7 of the 14 block groups within the four Census tracts containing 51% or more low/mod income population, making them income eligible areas for CDBG. Within these tracts the low/mod population is generally concentrated in north and east Goshen. These income eligible areas are block group 2 in Census tract 1, block groups 1, 3 and 4 in Census tract 2, block groups 2 and 3 in Census tract 3.02, and block group 1 in Census tract 5.02. A map of the income-eligible block groups is provided as an attachment.

All area benefit activities will be in income eligible Census block groups, based on the number of low/mod income households, and the need for assistance such as public facilities, infrastructure, housing rehab, and infill development of affordable housing. The areas are typically older neighborhoods with signs of deterioration, where investment in public infrastructure may be lagging, and where there is a need to preserve and create affordable housing, through assistance with housing rehab and infill development of new affordable housing.

The area strategy may include public infrastructure improvements, owner-occupied & multi-unit housing rehab, new housing construction, and partnerships with neighborhood associations and other groups in the area. The City's prior experience suggests that concentrating improvements in infrastructure, housing, services and neighborhood development in a specific area provides the greatest impact per dollar spent. There are long-term benefits when neighborhood associations, the city and local groups work together.

The majority of the income eligible areas have an active, organized neighborhood association. Having an organized neighborhood association in an income eligible area is a benefit to the City when implementing the CDBG program. Part of the CDBG process will be to strengthen neighborhood associations.

CDBG area-based activities are chosen based on Census income eligibility data, and on the basis of aging or deterioration in housing and infrastructure. The intent for CDBG area-based activities is to include infrastructure improvements, neighborhood development activities, and housing activities, including

rehabilitation, new construction, and support for homeownership. Infrastructure projects improve some of the oldest infrastructure within the City. CDBG funds alone are not adequate to carry out large-scale projects, and the City will continue to use CDBG funds with local funds and other funding sources. The benefit of combining CDBG funds with other funding sources is that a greater impact can be achieved than could be achieved with CDBG funds alone. In order to address a broader range of housing needs, including multi-family rehab, energy conservation, and new housing construction, CDBG funds will be available to a qualified Community-Based Development Organization (CBDO). CDBG funds will continue to be allocated for the development and strengthening of neighborhood associations, as part of the overall CDBG implementation.



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

### Priority Needs

Table 47 – Priority Needs Summary

<b>1</b>	<b>Priority Need Name</b>	Housing Opportunities
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate Large Families Families with Children Elderly Chronic Homelessness Individuals Families with Children Mentally Ill Elderly
	<b>Geographic Areas Affected</b>	
	<b>Associated Goals</b>	Housing Rehabilitation Multi Unit Housing Rehabilitation Single Unit Housing Construction Homeless Facilities Public Facilities & Improvements Public Service Activities- Urgent Needs Homeownership Assistance

	<p><b>Description</b></p> <p>Priority need areas and specific objectives were identified as outlined in the Citizen Participation section, and include:</p> <p>1) Housing Opportunities</p> <ul style="list-style-type: none"> <li>• Improve owner-occupied housing through rehab</li> <li>• Increase quality of rental housing</li> <li>• Increase transitional housing options</li> <li>• Increase availability of accessible housing</li> <li>• Reduce housing cost burden through higher wage job opportunities and job training</li> <li>• Provide permanent supportive housing for chronically homeless</li> <li>• Support affordable housing creation and preservation</li> <li>• Provide emergency shelter for homeless individuals and families</li> <li>• Expand housing options and assistance</li> <li>• Maintain and facilitate use of Housing Choice voucher program</li> </ul>
	<p><b>Basis for Relative Priority</b></p> <p>Housing opportunities is a priority due to the prevalence of cost burden, among owners and renters, the significant number of low/mod income population, and the overall need for more housing units, including affordable housing.</p>
<b>2</b>	<p><b>Priority Need Name</b></p> <p>Access to Services</p> <hr/> <p><b>Priority Level</b></p> <p>High</p> <hr/> <p><b>Population</b></p> <p>Extremely Low  Low  Moderate  Large Families  Families with Children  Elderly  Chronic Homelessness  Individuals  Families with Children  Mentally Ill  Elderly</p> <hr/> <p><b>Geographic Areas Affected</b></p>

	<b>Associated Goals</b>	Public Service Grants Homeless Facilities Public Service Activities- Urgent Needs
	<b>Description</b>	Priority need areas and specific objectives were identified as outlined in the Citizen Participation section, and include:  2) Access to Services <ul style="list-style-type: none"> <li>• Increase access to affordable healthcare</li> <li>• Increase services for mentally ill</li> <li>• Support programs for youth</li> <li>• Increase access to affordable childcare and early childhood education</li> <li>• Support services for elderly and the disabled</li> <li>• Support public transportation</li> <li>• Provide emergency shelter for homeless individuals and families</li> <li>• Provide permanent supportive housing for chronically homeless</li> <li>• Support counseling/advocacy for underserved populations</li> <li>• Increase access to substance abuse prevention and treatment</li> <li>• Support life skill development</li> <li>• Support nutrition programs and food assistance</li> </ul>
	<b>Basis for Relative Priority</b>	Access to services is a priority based on needs demonstrated by local agencies serving low/mod income individuals and families, including homeless and non-homeless special needs. Public service grants have the objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals, with the outcomes of available and affordable access to housing and services, such as healthcare, early childhood education, transportation and daily nutrition programs.
<b>3</b>	<b>Priority Need Name</b>	Neighborhood Revitalization
	<b>Priority Level</b>	High
	<b>Population</b>	Extremely Low Low Moderate
	<b>Geographic Areas Affected</b>	

<b>Associated Goals</b>	Housing Rehabilitation Multi Unit Housing Rehabilitation Single Unit Housing Construction Public Facilities & Improvements
<b>Description</b>	Priority need areas and specific objectives were identified as outlined in the Citizen Participation section, and include:  3) Neighborhood Revitalization <ul style="list-style-type: none"> <li>• Improve owner-occupied housing through rehab</li> <li>• Remove blighted residential properties</li> <li>• Address issue of vacant/foreclosed houses</li> <li>• Increase quality of rental housing</li> <li>• Support public infrastructure projects</li> <li>• Repair/replace existing sidewalks</li> <li>• Support neighborhood parks</li> </ul>
<b>Basis for Relative Priority</b>	Neighborhood revitalization is a priority based on the need to preserve and create affordable housing and to upgrade public facilities and improvements in low/mod income neighborhoods.

**Narrative (Optional)**

Based on the 2019 low/mod income summary data (LMISD) released by HUD for CDBG, effective April 1, 2019, four Census tracts, 1, 2, 3.02 and 5.02, contain the highest percentage of low/mod income population, with a total of seven of the 14 block groups within the four Census tracts containing 51% or more low/mod income population, making them income eligible areas for CDBG. Within these tracts the low/mod population is generally concentrated in north and east Goshen. These income eligible areas are block group 2 in Census tract 1, block groups 1, 3 and 4 in Census tract 2, block groups 2 and 3 in Census tract 3.02, and block group 1 in Census tract 5.02. There are also areas in adjacent block groups which have significant low/moderate income populations.

CDBG focus areas are chosen based on Census income eligibility, and on the basis of signs of deterioration in housing and infrastructure. The goal is to preserve and create affordable housing, through housing rehabilitation of single and multi unit housing, expand housing options and services, upgrade infrastructure, and strengthen neighborhood associations. CDBG funds alone are not adequate to carry out large-scale projects, and the City will partner with local community development agencies and use local funds with CDBG funds to expand the impact of the CDBG program. These projects will upgrade housing, expand housing options, and improve older infrastructure within the City. In the focus

areas, Lacasa will continue to assist with the development and strengthening of neighborhood associations, as part of the overall CDBG implementation.

Priority need areas and specific objectives were identified as outlined in the Citizen Participation section, and include:

### 1) Housing Opportunities

- Improve owner-occupied housing through rehab
- Increase quality of rental housing
- Increase transitional housing options
- Increase availability of accessible housing
- Reduce housing cost burden through higher wage job opportunities and job training
- Provide permanent supportive housing for chronically homeless
- Support affordable housing creation and preservation
- Provide emergency shelter for homeless individuals and families
- Expand housing options and assistance
- Maintain and facilitate use of Housing Choice voucher program

### 2) Access to Services

- Increase access to affordable healthcare
- Increase services for mentally ill
- Support programs for youth
- Increase access to affordable childcare and early childhood education
- Support services for elderly and the disabled
- Support public transportation
- Provide emergency shelter for homeless individuals and families
- Provide permanent supportive housing for chronically homeless
- Support counseling/advocacy for underserved populations
- Increase access to substance abuse prevention and treatment
- Support life skill development
- Support nutrition programs and food assistance

### 3) Neighborhood Revitalization

- Improve owner-occupied housing through rehab
- Remove blighted residential properties
- Address issue of vacant/foreclosed houses
- Increase quality of rental housing
- Support public infrastructure projects

- Repair/replace existing sidewalks
- Support neighborhood parks

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

### Influence of Market Conditions

Affordable Housing Type	Market Characteristics that will influence the use of funds available for housing type
Tenant Based Rental Assistance (TBRA)	cost burden for renter units and availability of affordable units
TBRA for Non-Homeless Special Needs	cost burden for renter units and availability of units for persons with special needs
New Unit Production	cost burden for renter units and availability of affordable rental units
Rehabilitation	cost burden for owner units leading to deferred maintenance and the need for rehab assistance, and multi-unit rental housing in poor condition or benefitting from energy efficiency improvements
Acquisition, including preservation	

**Table 48 – Influence of Market Conditions**

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

### **Introduction**

For each program year, direct funding available for CDBG is expected to include an annual entitlement grant of approximately \$250,000, miscellaneous income of approximately \$15,000 and prior year resources of approximately \$20,000, for an annual budget of approximately \$285,000. Based on past proposals, such as HUD's Moving CDBG Forward initiative, the City expects it could lose its entitlement grant at some point in the near future, based on falling below the proposed minimum threshold.

In times of urgent need or widespread crisis, additional CDBG funding may be awarded. In that event, an amendment, in accordance with the Citizen Participation Plan, will be completed. At the time of this plan substantial amendment, a CDBG-CV entitlement grant has been awarded and will be included in the Anticipated Resources for this Consolidated Plan.

Each program year, it is anticipated that CDBG funds will be used with housing development funds (such as HOME, Federal Home Loan Bank, LIHTC) to implement affordable housing projects undertaken by Community Based Development Organizations, and matched with local funds when there are opportunities for public facilities and improvements projects in income eligible neighborhoods. Local agencies receiving public service grants will match CDBG funds with other federal, state, local and in-kind funds, including volunteer hours. When available, CDBG funds for owner-occupied housing rehabilitation will be used with other grants/loans, such as Federal Home Loan Bank, and will also be used in conjunction with volunteer hours.

CDBG-CV funds in Program Year 2020 include an entitlement grant in the amount of \$294,514 provided in installments allocated to activities to prevent, prepare for and respond to the coronavirus. These activities do not expect to generate program income and are not combined with other sources of funds at this time.

The City does not directly receive HOME, ESG, HOPWA or LIHTC.

Warsaw Housing Authority will continue the Housing Choice voucher program, with an annual budget of approximately \$1.3 million for Goshen vouchers.



**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	272,823	45,000	279,165	596,988	1,140,000	A 2020 allocation of \$272,823 will be combined with an estimated \$45,000 of program income, and \$279,165 of prior year resources
Other	public - federal	Other	294,514	0	0	294,514	0	CDBG-CV funds to be used to prevent, prepare for and respond to the coronavirus.

**Table 49 - Anticipated Resources**

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

In addition to CDBG funds, the federal, state and local resources (on-going and new) expected to be made available to address the needs identified in the CDBG annual plan include:

- \$1.3 million HUD Housing Choice Voucher program
- \$336,000 HOME funds, multi-unit rehab

Warsaw Housing Authority (GHA) administers a Housing Choice voucher budget of approximately \$1.3 million for Goshen vouchers.

During program year 2020, Lacasa expects to receive approximately \$336,000 of HOME funds from Indiana Housing & Community Development Authority (IHCDA), to be used with \$122,000 of CDBG funds, for rehab of a vacant four-unit rental property, to provide four rental units affordable at 60% AMI. Rents will follow the rents required by the primary funding source, in this case for HOME as set by IHCDA. The HOME funds require a 20-year affordability period, and the CDBG funds will require a concurrent five-year affordability period.

Program year 2020 will include \$250,000 of CDBG funds to upgrade the energy system of an existing 33-unit affordable housing development, Hawks Arts & Enterprise Center, a HOME and LIHTC project with six units affordable at 30% AMI, nine units affordable at 40% AMI, ten units affordable at 50% AMI, and eight units affordable at 60% AMI. Hawks is in year six of a 30-year affordability period, and the CDBG funds will require a concurrent five-year affordability period.

Funding for the rehabilitation of approximately eight (8) single-family, owner-occupied homes in program year 2020 is budgeted at \$116,029. CDBG funds will be matched with private and in-kind donations and volunteer labor.

CDBG public service grants received by local organizations are matched with additional funding, including volunteer labor. In PY 2019, CDBG public service budgeted funds of \$46,125 were matched with \$805,914 of State, local, private and other funds, as reported in IDIS as of March 7, 2020.

While there is not a match requirement for CDBG-CV funds, there have been forms of assistance made available in response to the coronavirus-federal, state, local and/or private contributions. Many of the sub-recipients have received some type of assistance or supplementary funding for their projects. Extra measures are being taken to ensure duplication of benefits does not occur.

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

Not applicable.

**Discussion**

In program year 2020, prior year resources of \$279,165 from two cancelled infrastructure activities in PY 2018 and PY 2019 will be added to the CDBG budget, and the majority (82%) of the CDBG budget will be used for housing activities, including single-unit rehab and multi-unit rehab, including energy efficiency improvements, meeting the objective of creating and preserving decent housing for low/moderate income families and individuals, with the outcomes of available and affordable access to housing and rehabilitation services, and sustainable and viable neighborhoods.

In program year 2020, approximately 8% of the CDBG budget will be used for public service grants, funded at the 15% maximum cap, with the objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals, with the outcomes of available and affordable access to housing, primary healthcare, mental health services, early childhood education, senior transportation, and daily nutrition programs.

Finally, approximately 10% of the 2020 CDBG budget will be spent for program planning & administration, which will facilitate the implementation of all other activities. Program planning funds will primarily support neighborhood outreach in income eligible areas. General administration funds will be spent in support of the overall CDBG program.

## SP-40 Institutional Delivery Structure – 91.215(k)

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

Responsible Entity	Responsible Entity Type	Role	Geographic Area Served
goshen	Government	Planning neighborhood improvements public facilities	
LA CASA OF GOSHEN, INC	Subrecipient	Ownership Planning Rental	
BOYS AND GIRLS CLUB OF GOSHEN	Subrecipient	public services	
CENTER FOR HEALING & HOPE	Subrecipient	public services	
Council on Aging of Elkhart County	Subrecipient	public services	
Elkhart County Clubhouse	Subrecipient	public services	
GOSHEN INTERFAITH HOSPITALITY NETWORK	Subrecipient	Homelessness	
MAPLE CITY HEALTH CARE CENTER, INC.	Subrecipient	public services	
WALNUT HILL EARLY CHILDHOOD EDUCATION CENTER	Subrecipient	public services	

**Table 50 - Institutional Delivery Structure**

### Assess of Strengths and Gaps in the Institutional Delivery System

The City of Goshen's five-year plan will be carried out through the Planning office, Community Development Department, Mayor's office, Board of Public Works, Clerk Treasurer's office, and Engineering Department, with primary responsibility for administration through the Planning office. The Planning office will work closely with Lacasa to manage and implement the housing activities. The planning neighborhood outreach activity will be implemented by Lacasa. Infrastructure improvements will be implemented as a joint activity of the Planning and Engineering departments. Plan implementation will occur in close cooperation with a number of local non-profit and institutional partners, including Lacasa, City of Elkhart, Elkhart County, Region 2 Continuum of Care, Boys & Girls Clubs of Elkhart County, Center for Healing & Hope, Council on Aging of Elkhart County, Elkhart County Clubhouse, Goshen Interfaith Hospitality Network, Maple City Health Care Center, Walnut Hill Early

Childhood Center, Oaklawn Mental Health Center, Habitat for Humanity of Elkhart County, and Warsaw Housing Authority. In addition to active partners, many organizations are on the general CDBG contact list and receive regular information and requests for input. Neighborhood associations are also partners, and efforts will continue to strengthen the capacity of these groups and increase their participation with the CDBG program.

Strong partnerships exist between public, private, non-profit and institutional groups in Goshen, and between the Goshen and Elkhart City CDBG programs. These relationships, which are facilitated through regular contact, ensure consistent implementation of the five-year and annual plans. One outcome of these partnerships has been several combined applications for grant funding, such as Neighborhood Stabilization Program Round 1, which was a partnership between City of Goshen, Habitat for Humanity and LaCasa. Although it was not funded, an NSP2 consortium application was submitted from City of Goshen, City of Elkhart and LaCasa. This demonstrates the level of cooperation and strong working relationships which exist and which strengthen the CDBG program.

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

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

<b>Other</b>			

**Table 51 - Homeless Prevention Services Summary**

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

Emergency shelter in Elkhart County is provided by Faith Mission, primarily serving homeless individuals, Goshen Interfaith, serving homeless families with children and single women, and by the YWCA Safe Haven Women's Shelter, serving victims of domestic violence. Transitional housing is provided by Emerge Ministries, Faith Mission, and SPA ministries. Permanent supportive housing is provided by AIDS Ministries and Oaklawn Mental Health Center. Coordination occurs through the Indiana Region 2 Homeless Coalition (the local Continuum of Care) which meets bi-monthly to coordinate and discuss services to address and prevent homelessness in Elkhart County and Region 2.

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

The system to address the housing and supportive services needs for persons who are not homeless but have other special needs operates mostly informally through the cooperation of local agencies providing housing and services, and formally through the Indiana Region 2 Homeless Coalition (the local Continuum of Care). Goshen's CDBG administrator serves on the CoC executive committee, and will continue to regularly participate with this group. Support will also continue for local agencies providing services for persons with special needs, including prevention of homelessness, outreach, case management, transitional housing and permanent supportive housing.

Because of limited CDBG funding, the non-homeless special needs population will be primarily served outside of the CDBG-funded programs. Local agencies providing these services include ADEC, AIDS Ministries, Church Community Services, Council on Aging, Elkhart County Clubhouse, Elkhart Township Trustee, Emerge Ministries, Goodwill Industries, Greencroft Goshen, Lacasa, Oaklawn Mental Health Center, REAL Services, Warsaw Housing Authority, and YWCA of Northern Indiana. These populations are currently fairly well served and there are simply no CDBG resources available to be directed specifically toward these populations.

A small portion of these populations, such as elderly and physically disabled homeowners, will be assisted through the owner-occupied housing rehabilitation program and through the neighborhood-based community development efforts. Additional assistance is provided through the NED (non-elderly disabled) Housing Choice vouchers for persons with disabilities administered by Warsaw Housing Authority.

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

Although there is always room for improvement, strong partnerships exist between public, private, non-profit and institutional groups in Goshen, and between the Goshen and Elkhart City CDBG programs. These relationships, which are facilitated through regular contact, ensure consistent implementation of the five-year and annual plans and help address the gaps in the service delivery system. Service providers work together through the local Continuum of Care (Indiana Region 2 Homeless Coalition), which meets bi-monthly to coordinate and discuss services to address and prevent homelessness in Elkhart County and Region 2. Goshen's CDBG administrator serves on the executive committee of the CoC. Input was provided by the CoC for the CDBG five-year plan. Many service providers are also on the CDBG contact list and receive regular updates about the CDBG program. These agencies were given the opportunity to provide input through direct contact and through several public meetings.

## SP-45 Goals Summary – 91.215(a)(4)

### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Rehabilitation Multi Unit	2020	2024	Affordable Housing		Housing Opportunities Neighborhood Revitalization	CDBG: \$500,000	Rental units rehabilitated: 20 Household Housing Unit
2	Housing Rehabilitation Single Unit	2020	2024	Affordable Housing		Housing Opportunities Neighborhood Revitalization	CDBG: \$332,925	Homeowner Housing Rehabilitated: 25 Household Housing Unit
3	Housing Construction	2020	2024	Affordable Housing		Housing Opportunities Neighborhood Revitalization		
4	Public Service Grants	2020	2024	Access to Services		Access to Services	CDBG: \$166,725	Public service activities other than Low/Moderate Income Housing Benefit: 20000 Persons Assisted
5	Homeless Facilities	2020	2024	Homeless		Housing Opportunities Access to Services	CDBG: \$47,025	Homeless Person Overnight Shelter: 375 Persons Assisted



Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Public Facilities & Improvements	2020	2024	Non-Housing Community Development		Housing Opportunities Neighborhood Revitalization		Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 12500 Persons Assisted
7	Public Service Activities- Urgent Needs	2020	2021	Affordable Housing Access to Services		Housing Opportunities Access to Services	CDBG-CV: \$284,968	Public service activities other than Low/Moderate Income Housing Benefit: 3718 Persons Assisted  Homelessness Prevention: 60 Persons Assisted
8	Homeownership Assistance	2022	2024	Affordable Housing		Housing Opportunities	CDBG: \$103,325	Direct Financial Assistance to Homebuyers: 10 Households Assisted

**Table 52 – Goals Summary**

## Goal Descriptions

1	<b>Goal Name</b>	Housing Rehabilitation Multi Unit
	<b>Goal Description</b>	Each program year, approximately 35% of the CDBG budget will be used for multi unit housing rehabilitation, including energy efficiency improvements, to be undertaken by a Community Based Development Organization. The objective is to create and preserve decent rental housing for low/moderate income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable neighborhoods. The goal is to rehab four units each program year. CDBG funds will likely be a secondary funding source, matched with HOME and/or LIHTC.
2	<b>Goal Name</b>	Housing Rehabilitation Single Unit
	<b>Goal Description</b>	The loan/grant program for owner-occupied housing rehabilitation will continue, with a goal of providing assistance to five units per year, using approximately 17% of each program year budget. One goal of investing in owner-occupied rehabilitation is to stimulate investment by landlords in the area so that rental properties are also improved. Owner-occupied rehabilitation preserves existing housing at a much lower cost than new construction, and rehabilitation may encourage private investment in maintenance and rehabilitation by neighbors. This program assists elderly residents and people with special needs to continue living in their homes and neighborhoods. The objective is to support the retention of decent housing, with the outcome of affordable rehabilitation services.
3	<b>Goal Name</b>	Housing Construction
	<b>Goal Description</b>	The estimated five-year budget does not allocate funding for new affordable housing construction, but if additional funds become available this is a goal, to be undertaken by a Community Based Development Organization.
4	<b>Goal Name</b>	Public Service Grants
	<b>Goal Description</b>	Each program year, approximately 15% of the CDBG budget will be used for public service grants, with the objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals, with the outcomes of available and affordable access to housing and services, such as primary healthcare, mental health services, early childhood education, transportation and daily nutrition programs.

5	<b>Goal Name</b>	Homeless Facilities
	<b>Goal Description</b>	Each program year, at least one public service grant will support homeless facilities. The objective for support of homeless facilities is to provide decent housing and a suitable living environment, with the outcomes of the housing and related services being available and affordable.
6	<b>Goal Name</b>	Public Facilities & Improvements
	<b>Goal Description</b>	The estimated five-year budget does not allocate funding for public facilities & improvements, but if additional funds become available this is a goal, be used for projects in income-eligible neighborhoods that support upgrades to aging infrastructure, access to public facilities, sidewalk construction/repair, and new infrastructure needed for affordable housing rehabilitation and/or construction. This goal meets the objective of creating a suitable living environment, with the outcome of more sustainable and viable neighborhoods.
7	<b>Goal Name</b>	Public Service Activities- Urgent Needs
	<b>Goal Description</b>	For Program Year 2020, approximately 96.8% of the CDBG-CV budget will be used for public service activities to prevent, prepare for and respond to the coronavirus. This goal is designed to alleviate existing conditions caused by the coronavirus, which pose a serious and immediate threat to the health and welfare of the community, which is of recent origin, and for which the City of Goshen is unable to provide funding. The City of Goshen will use the origin of the public health emergency as declared by the U.S. Department of Health and Human Services press release issued January 31, 2020, and retroactive to January 27, 2020. The City aims to expend these funds as quickly as possible in an effort to meet community need. In addition to addressing and responding to the public health crisis, these public service activities will meet the objective of creating a suitable living environment for low/moderate income individuals and families, with the outcomes of increased availability, accessibility and affordability of services, such as primary healthcare, mental health supportive services, early childhood education, senior support services and child/adolescent support services. Furthermore, the public service activity with the additional allocation of CV funds (Short-Term Rent and Utility Assistance Program) will address the identified need of promoting housing opportunities by meeting the objective of creating a suitable living environment by expanding housing assistance. The intended outcomes of this project are to make housing more affordable for renters financially affected by the coronavirus, preventing homelessness and/or utility disconnect.

8	<b>Goal Name</b>	Homeownership Assistance
	<b>Goal Description</b>	Starting in program year 2022, CDBG funding for direct homeownership assistance will be used to help low/moderate income homebuyers purchase single family homes in Goshen, with a goal of assisting up to four households a year and using approximately 12% of the overall CDBG budget each program year. The objective is to provide decent housing, with the outcome of the housing being affordable. Assistance may include up to 50% of the down payment, all or part of reasonable closing costs, all or part of the up-front mortgage insurance premium, funds to reduce the effective interest rate, and/or mortgage principal reduction.

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

Each program year the CDBG program expects to rehabilitate four units of multi-family rental housing and five units of single-family owner-occupied housing, and help with homeownership assistance for up to four homebuyers with CDBG funds matched with other local, state and federal funds, and with private and in-kind donations and volunteer labor. These programs will include low/moderate income elderly, persons with disabilities, and both large and small related households.

Warsaw Housing Authority administers a HUD Housing Choice Voucher program, including Goshen vouchers with a \$1.3 million annual budget, that was supporting 173 vouchers as of December 1, 2019, including 33 NED (non-elderly disabled) vouchers for persons with disabilities. The program is in the process of adding homeownership vouchers.

Support for homeless persons and persons with special needs will continue in each program year through support for emergency shelter and permanent supportive housing, with 75 homeless persons assisted each year and 29 households provided permanent supportive housing.

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

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

Warsaw Housing Authority (WHA) is not subject to a Section 504 voluntary compliance agreement. Based on recent vouchers issued by WHA, approximately one-third of participants are individuals with disabilities and 7% are elderly.

### **Activities to Increase Resident Involvements**

There are no public housing units in Goshen. Warsaw Housing Authority (WHA) operates a Housing Choice voucher program, including vouchers for Goshen, which were absorbed when Goshen Housing Authority was dissolved in 2018. WHA works closely with other agencies who provide services for low- and moderate-income families, and have been working with volunteers in Goshen who are providing case management. WHA operates a Good Housekeeping Award program, initiated in 2015, to promote pride in housing and to encourage tenants to keep units clean and immediately report maintenance issues rather than waiting for an inspection. In 2019 nearly 70% of WHA clients received a Good Housekeeping award. WHA is currently in the process of adding homeownership vouchers for a first-time homebuyer program.

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

No

### **Plan to remove the ‘troubled’ designation**

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

### **Barriers to Affordable Housing**

As a way to remove barriers to affordable housing, the City has provided tax phase-ins, grants, loans and assistance for projects which have rehabilitated deteriorating housing or redeveloped brownfield sites, creating affordable housing for low and moderate income persons. The City also provided a loan to Lacasa to be used in Lacasa's Revolving Real Estate Development Fund, which was established with the intent to acquire, rehabilitate and return to homeownership run-down, often vacant, investment properties. Within neighborhoods, residents often cite vacant and dilapidated properties as a major concern, and this fund seeks to address the worst of these problem properties. Potential homebuyers have access to Lacasa's homeownership classes, financial training, and a matched savings program.

The City has also partnered with local agencies and other units of local government to pursue grant funding, such as a successful Neighborhood Stabilization Program Round 1 (NSP1) grant, to develop affordable housing.

The City is not aware of any local ordinances or policies which create unreasonable barriers to affordable housing. The City will continue to explore incentives and opportunities available for the development of affordable housing, and will continue to use local public resources for infrastructure improvements to enhance living conditions in low/moderate income neighborhoods. Efforts will continue to preserve existing affordable housing and create new affordable housing, through housing rehabilitation and new construction.

### **Strategy to Remove or Ameliorate the Barriers to Affordable Housing**

Cost burden is the most significant housing issue, for both owners and renters. For owners, excessive cost burden means that maintenance and improvements are often deferred, resulting in the need for rehab assistance. Renters with excessive cost burden may require rental assistance to ensure stable housing.

Strategies to address barriers include rehab of multi unit rental housing, rehab of owner-occupied housing, construction of new affordable housing, upgrades to infrastructure and new infrastructure to complement housing activities, rental assistance for low income tenants and the homeless, and assistance for homeless persons and persons with special needs.

Strategies are implemented cooperatively, with a past example a \$2.1 million NSP1 grant, an application by the City, in partnership with Lacasa and Habitat for Humanity. Implementation was completed in PY 2016, with 14 single-family homes rehabbed/redeveloped, one multi-family (six-unit) rehabbed, and six uninhabitable residential properties demolished.

Permanent supportive housing (PSH) is a partnership of Lacasa, the owner/developer, and Oaklawn, the service provider, with a total of 29 units in Goshen at two locations.

In PY 2019 construction began for a new PSH project in the City of Elkhart, Benham Avenue Apartments, to provide 11 new housing units and supportive services for chronically homeless. Occupancy will begin in April 2020. Funding for the \$1.8 million project includes HOME, Housing Trust Fund, and IHCD Development Fund, with rental assistance through Shelter+Care vouchers. The project is another partnership of Lacasa and Oaklawn. PSH is a successful model that provides stable housing and supportive services.

Current activities, projects and efforts to remove barriers include:

- Westplains II, a Lacasa/Oaklawn project, to increase affordable rental options, with 5 units  $\leq$  40% AMI and 3 units  $\leq$  60% AMI, to divert Oaklawn clients from homelessness and provide independent options for clients who would otherwise be underhoused.
- A Lacasa project with 2 units at 102 N 9th, to increase rental housing options, with each 3-bedroom unit for families  $\leq$  60% AMI.
- A \$1.4 million Lacasa project for rehab of 5 multi-family dwellings in East Lincoln Crossroads to provide 20 quality rental units. Three of the 5 properties were completed in 2018.
- Lacasa financial empowerment services include financial training/coaching, matched savings, homebuyer training, and workplace financial empowerment.
- A Lacasa workforce housing development project, to address a shortage of affordable housing, with Indiana modular units placed in the City of Elkhart.
- A Lacasa HOME Innovation Grant, for affordable housing construction and/or rehab in 3 neighborhoods, Goshen, City of Elkhart, and Elkhart County. The program includes pre-purchase counseling, home ownership training, financial education, and matched savings.
- Lacasa submitted an application for The Oaks, requesting \$834,000 in tax credits and \$400,000 HOME funds, for construction of 40 two, three, and four bedroom units, with 20 multi-family units and 14 attached single units in an existing undeveloped subdivision, and six single houses on infill lots. The application was not funded.

Past LIHTC projects have included Hawks Arts and Enterprise Center, a \$6.8 million project, using HOME and FHLB funding, fully occupied when open in April 2015, providing 33 affordable units, and Maple Court Place, a \$7.6 million project, completed in December 2011, with 6 one-bedroom units, 24 two-bedroom units, 24 three-bedroom units, and 6 four-bedroom units.

Cooperative efforts to address barriers include a countywide housing needs assessment undertaken by the City of Goshen, City of Elkhart, Elkhart County, Lacasa and Habitat for Humanity, completed in PY 2014.

## **SP-60 Homelessness Strategy – 91.215(d)**

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

Advocacy, education and coordination of housing and homeless programs in Indiana is managed by the Indiana Housing & Community Development Authority (IHCDA), through the regional Continuum of Care (CoC) network. Goshen, located in Elkhart County, is part of Region 2 CoC, and actively participates with the Indiana Region 2 Homeless Coalition, which meets bi-monthly. Goshen's CDBG administrator serves on the executive committee of the CoC. The City of Goshen does not expect to receive any direct public or private funding to address homeless needs and to prevent homelessness.

Specific steps being taken to eliminate chronic homelessness include the following:

1. A total of 29 units of permanent supportive housing have been constructed and occupied in Goshen for chronically homeless, with an additional 11 units under construction in the City of Elkhart in PY 2019;
2. Agencies outside the City of Goshen, such as Oaklawn Mental Health Center, Salvation Army, The Window, and Elkhart Township Trustee's office, will continue to provide supportive services to the chronically homeless population;
3. The Indiana Region 2 Homeless Coalition will continue to work with IHCDA to increase the effectiveness of the Region 2 Continuum of Care; and;

The City of Goshen, City of Elkhart, Lacasa, Oaklawn, Goshen Interfaith Hospitality Network, Habitat for Humanity, and other local agencies will continue to hold regular discussions and work together to address issues related to chronic homelessness.

### **Addressing the emergency and transitional housing needs of homeless persons**

Within Elkhart County, emergency shelter for homeless individuals and families is provided by Faith Mission, located in the City of Elkhart. In Goshen, emergency shelter for families and single women is provided by Goshen Interfaith Hospitality Network (GIHN). Emergency shelter for victims of domestic violence is provided by the YWCA Safe Haven Women's Shelter, with a total of 82 beds available for households with children and 95 beds available for households with no children. Permanent supportive housing (PSH) is provided in Elkhart County by AIDS Ministries and Oaklawn Mental Health Center, with 29 fixed-site PSH units in Goshen, and an additional 38 fixed and scattered site (vouchers) beds in Elkhart County. Transitional housing for homeless households is provided by Emerge Ministries, located in the City of Elkhart, with a total of 16 beds, serving households with and without children. Faith Mission operates transitional housing in the City of Elkhart, with a total of 30 beds, serving households with children.

Families and individuals who are homeless have few resources and little money to stabilize their situation while they try to find work and a place to live. Often families are forced to rent substandard or



overcrowded housing units because they do not have rental or utility deposits and are not able to earn enough to find housing that meets their needs. Transitional housing programs provide services, support and training to assist families and individuals toward stability. In Elkhart County, transitional housing is provided by Emerge Ministries, SPA Ministries, and Faith Mission, with a total of 46 beds for households with children and 18 beds for households without children. None of the transitional housing units are located in Goshen.

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

Two permanent supportive housing (PSH) projects have been constructed in Goshen. The first PSH project, Lincoln West Apartments, contains 14 units, and was completed in December 2011 and fully occupied by March 2012. The second PSH project, Westplains Apartments, with 15 units, was completed in January 2014 and was fully occupied by March 2014. The PSH projects are a partnership of Lacasa, the owner/developer, and Oaklawn Mental Health Center, the service provider. A new Lacasa-Oaklawn PSH project with 11 units in the City of Elkhart was under construction in PY 2019, with occupancy expected to begin in April 2020.

Permanent supportive housing is also provided by AIDS Ministries, with a program serving families and individuals in Elkhart County, with housing located in the City of Elkhart. This program provides housing and supportive services, with six beds for individuals and two beds for families with children.

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

The most direct method of preventing homelessness for the City is the Housing Choice Voucher program, which is operated by Warsaw Housing Authority (WHA), with Goshen vouchers that were absorbed when Goshen Housing Authority (GHA) dissolved. Prior to the dissolution, GHA operations were administered by WHA. The Housing Choice voucher annual budget for Goshen Vouchers has been approximately \$1.3 million, with 173 vouchers in use as of December 1, 2019, including 33 for persons with disabilities.

At the present time, there is not a coordinated discharge policy in place for Elkhart County. In the past, this has been discussed at the Indiana Region 2 Homeless Coalition and will continue to be a goal that is

pursued. Previously, the Indiana Coalition on Housing and Homeless Issues, now subsumed through IHDA, developed an action plan to end chronic homelessness, which includes a strategy to ensure that individuals are not released from institutions into homelessness. This plan was presented and discussed at the Indiana Region 2 Homeless Coalition.

The Elkhart County Reentry Initiative (ECRI) was initiated by the Elkhart County Sheriff's Department several years ago. The goal is to reduce recidivism, which is estimated at 30-70% for Elkhart County, which has 700 inmates per year coming back to Elkhart County from prison. The reentry initiative is intended to facilitate networking with resources, to help remove barriers to successful reentry. Some of the challenges faced by individuals returning to the community from prison are employment, education, housing, transportation, access to resources, health (addictions/mental illness/physical), accountability and a changing world. ECRI is providing training for mentors, accountability partners or transitional coaches to help individuals with reentry challenges.

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

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

In May 2012, a \$2.4 million HUD Lead Hazard Control Grant was awarded to Elkhart County, with the goal of addressing lead hazards in approximately 140 housing units in Elkhart County, including the City of Goshen. This followed successful completion of a three-year, \$3 million lead hazard grant awarded to Elkhart County, with the City of Goshen providing assistance through an Interlocal agreement. The first lead hazard control grant completed in program year 2011 assisted 67 housing units in Goshen, out of a total of 197 units assisted countywide. The \$3 million grant was matched with approximately \$973,632 of local funds, in a three-year program which funded education, outreach and training, and addressed lead hazards in a total of 197 housing units. Major partners were Elkhart County Health Department and Lacasa, with many additional community partners, including the City of Goshen and City of Elkhart. This investment provided an additional positive impact within CDBG income eligible areas and strengthened the overall community development efforts taking place within the City of Goshen.

As the City of Goshen has no city health department, the City is under the jurisdiction of the Elkhart County Health Department, which provides free lead screening tests, takes referrals from local physicians, and follows up with case management and environmental investigations. The Department employs licensed lead inspectors and conducts lead risk assessments and lead clearance exams. The Department's Community Health Nursing program manages lead cases and conducts lead screenings, along with outreach and education. Identified lead poison cases are reported to the State Board of Health, the property owner and the parents/guardian.

The City and Lacasa will continue to inspect for and address lead paint hazards in the housing rehabilitation program, and will provide participants with information regarding lead paint hazards. Based on information from the Health Department, education, blood testing and counseling may be the most cost-effective measures to lower cases of lead poisoning in children.

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

There is no data related to the number of housing units occupied by low/mod income families and the age of the housing. Based on the 2013-2017 ACS 5-year estimates, 50% of occupied housing units in Goshen were built prior to 1980. Of these pre-1980 units, 53% are owner occupied and 47% are renter occupied. Of owner occupied housing units, 5% of pre-1980 units are occupied by householders 15-34 years of age, and of renter occupied units 18% of pre-1980 units are occupied by householders 15-34 years of age, which could indicate the presence of small children.

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

The City and Lacasa will continue to inspect for and address lead paint hazards in the housing rehabilitation program, and will provide participants with information regarding lead paint hazards.

Based on information from the Health Department, education, blood testing and counseling may be the most cost-effective measures to lower cases of lead poisoning in children.

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

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

The antipoverty strategy will continue as in previous CDBG program years, as a component of each community development and housing objective, based on the assumption that the most effective tools for reducing poverty are stable housing, education, training and access to supportive services. These are all key components of housing activities, public service grants, and neighborhood-based community development efforts. CDBG assistance will be part of the overall strategy to provide households in poverty with the stability, services and support necessary for successful employment, such as transportation, rental housing assistance, case management, child care assistance and healthcare assistance. Homeownership training and financial fitness training will be available to neighborhood residents through the housing construction and rehabilitation programs.

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

The Housing Choice voucher program is an essential foundation of the City's housing strategy, as it assists families so that they pay no more than 30 percent of their gross income for rent and utilities. This reduces the need for constant shifting of housing units, and provides stability so children are able to remain in the same school for no less than one year. In addition to the Housing Choice voucher program, other affordable housing in Goshen includes 267 Section 8 elderly units at Greencroft Goshen, 41 units in Maple Leaf Commons, a Section 202 PRAC for elderly, 15 income-based rental units at Mercer Manor, supported by USDA Rural Development, Maple Court Place, a 60-unit apartment complex affordable for low/moderate income persons, 28 affordable units in the Shoots and Hattle buildings, 72 affordable units at Arbor Ridge, and 29 units of fixed-site permanent supportive housing (PSH) in two locations. An additional six units of scattered site PSH were occupied in Goshen in PY 2018, designated for individuals with disabilities. New affordable housing, completed and fully occupied in PY 2014, was provided through a \$6.8 million LIHTC project, Hawks Arts and Enterprise Center, developed by Lacasa, providing 33 affordable units, a mix of one and two bedroom units.

## **SP-80 Monitoring – 91.230**

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

A number of actions occur each year to ensure long-term compliance with program requirements. One of these is a mandatory meeting held with potential public service grant applicants prior to application forms being made available. This meeting is held to ensure that potential sub-recipients understand CDBG requirements, and to give an opportunity for questions and discussion. At this meeting, basic requirements are explained, along with the application process, and questions are answered about the CDBG program. Following this meeting, individual meetings are held with all potential new public service grant applicants to discuss the proposed activity in detail and to discuss the specific requirements of the CDBG program related to the proposed application and activity. It is intended that these individual meetings will help ensure that time is not spent on applications for ineligible activities, and to ensure that the organizational capacity exists to carry out and fulfill all the CDBG requirements. In addition to the application meeting, individual meetings are typically held at the time sub-recipient agreements are signed, to go over program requirements and to answer any questions sub-recipients may have.

All CDBG sub-recipients are required to submit regular reports using a standard form provided by the CDBG administrator. The report form includes a short narrative response and information specific to IDIS reporting requirements. A report is required each time a request for funds is made, or not less than each quarter if no funds are requested. The CDBG administrator monitors the status of all activities, including unspent balances, each time a report is submitted, and each time a draw is made in IDIS. At least once each quarter, the CDBG administrator downloads and reviews the IDIS-PR02 report, List of Activities by Program Year and Project, to monitor the CDBG funds spent and remaining to be spent.

The City of Goshen CDBG program will conduct annual sub-recipient and CBDO monitoring of all housing activities and any public facilities & improvements projects. Each year, the City will conduct on-site monitoring of fifty percent (50%) of the public service sub-recipient projects, which will result in each public service sub-recipient being monitored every two years.

The City of Goshen will conduct an on-site visit at the agencies being monitored. A notification letter will be sent to the agencies being monitored, with the date of the visit and identifying the files and/or specific items that will be reviewed. A checklist developed using Appendix 5-21 of *Managing CDBG: A Guidebook for Grantees on Subrecipient Oversight* will be used to ensure a comprehensive review of the program. Following the monitoring visit, a letter will be sent to each agency monitored, detailing any deficiencies found and areas that need improvement.

With urgent need funds, the CDBG application for public service grants requires potential sub-recipients to disclose any other sources of funding to ensure there is no duplication of funds. An on-site monitoring

schedule and process similar to that of traditional CDBG funds will be established for urgent need funds. Verification of other funding or assistance received for or applied to urgent need activities will be required to be made available at time of on-site monitoring.

The CDBG administrator is a member of the committee that reviews and approves owner-occupied housing rehabilitation projects, and is closely involved in the selection and monitoring of all housing activities. Claims are not paid until all required paperwork is received.

Each CDBG public facilities improvements project is managed by the Goshen City Engineering and Utility Departments, with the close involvement of the CDBG administrator to ensure compliance with CDBG program requirements.

## Expected Resources

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

#### Introduction

For each program year, direct funding available for CDBG is expected to include an annual entitlement grant of approximately \$250,000, miscellaneous income of approximately \$15,000 and prior year resources of approximately \$20,000, for an annual budget of approximately \$285,000. Based on past proposals, such as HUD's Moving CDBG Forward initiative, the City expects it could lose its entitlement grant at some point in the near future, based on falling below the proposed minimum threshold.

In times of urgent need or widespread crisis, additional CDBG funding may be awarded. In that event, an amendment, in accordance with the Citizen Participation Plan, will be completed. At the time of this plan substantial amendment, a CDBG-CV entitlement grant has been awarded and will be included in the Anticipated Resources for this Consolidated Plan.

Each program year, it is anticipated that CDBG funds will be used with housing development funds (such as HOME, Federal Home Loan Bank, LIHTC) to implement affordable housing projects undertaken by Community Based Development Organizations, and matched with local funds when there are opportunities for public facilities and improvements projects in income eligible neighborhoods. Local agencies receiving public service grants will match CDBG funds with other federal, state, local and in-kind funds, including volunteer hours. When available, CDBG funds for owner-occupied housing rehabilitation will be used with other grants/loans, such as Federal Home Loan Bank, and will also be used in conjunction with volunteer hours.

CDBG-CV funds in Program Year 2020 include an entitlement grant in the amount of \$294,514 provided in installments allocated to activities to prevent, prepare for and respond to the coronavirus. These activities do not expect to generate program income and are not combined with other sources of funds at this time.

The City does not directly receive HOME, ESG, HOPWA or LIHTC.

Warsaw Housing Authority will continue the Housing Choice voucher program, with an annual budget of approximately \$1.3 million for Goshen vouchers.



**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	272,823	45,000	279,165	596,988	1,140,000	A 2020 allocation of \$272,823 will be combined with an estimated \$45,000 of program income, and \$279,165 of prior year resources
Other	public - federal	Other	294,514	0	0	294,514	0	CDBG-CV funds to be used to prevent, prepare for and respond to the coronavirus.

**Table 53 - Expected Resources – Priority Table**

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

In addition to CDBG funds, the federal, state and local resources (on-going and new) expected to be made available to address the needs identified in the CDBG annual plan include:

- \$1.3 million HUD Housing Choice Voucher program
- \$336,000 HOME funds, multi-unit rehab

Warsaw Housing Authority (GHA) administers a Housing Choice voucher budget of approximately \$1.3 million for Goshen vouchers.

During program year 2020, Lacasa expects to receive approximately \$336,000 of HOME funds from Indiana Housing & Community Development Authority (IHCDA), to be used with \$122,000 of CDBG funds, for rehab of a vacant four-unit rental property, to provide four rental units affordable at 60% AMI. Rents will follow the rents required by the primary funding source, in this case for HOME as set by IHCDA. The HOME funds require a 20-year affordability period, and the CDBG funds will require a concurrent five-year affordability period.

Program year 2020 will include \$250,000 of CDBG funds to upgrade the energy system of an existing 33-unit affordable housing development, Hawks Arts & Enterprise Center, a HOME and LIHTC project with six units affordable at 30% AMI, nine units affordable at 40% AMI, ten units affordable at 50% AMI, and eight units affordable at 60% AMI. Hawks is in year six of a 30-year affordability period, and the CDBG funds will require a concurrent five-year affordability period.

Funding for the rehabilitation of approximately eight (8) single-family, owner-occupied homes in program year 2020 is budgeted at \$116,029. CDBG funds will be matched with private and in-kind donations and volunteer labor.

CDBG public service grants received by local organizations are matched with additional funding, including volunteer labor. In PY 2019, CDBG public service budgeted funds of \$46,125 were matched with \$805,914 of State, local, private and other funds, as reported in IDIS as of March 7, 2020.

While there is not a match requirement for CDBG-CV funds, there have been forms of assistance made available in response to the coronavirus-federal, state, local and/or private contributions. Many of the sub-recipients have received some type of assistance or supplementary funding for their projects. Extra measures are being taken to ensure duplication of benefits does not occur.

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

Not applicable.

**Discussion**

In program year 2020, prior year resources of \$279,165 from two cancelled infrastructure activities in PY 2018 and PY 2019 will be added to the CDBG budget, and the majority (82%) of the CDBG budget will be used for housing activities, including single-unit rehab and multi-unit rehab, including energy efficiency improvements, meeting the objective of creating and preserving decent housing for low/moderate income families and individuals, with the outcomes of available and affordable access to housing and rehabilitation services, and sustainable and viable neighborhoods.

In program year 2020, approximately 8% of the CDBG budget will be used for public service grants, funded at the 15% maximum cap, with the objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals, with the outcomes of available and affordable access to housing, primary healthcare, mental health services, early childhood education, senior transportation, and daily nutrition programs.

Finally, approximately 10% of the 2020 CDBG budget will be spent for program planning & administration, which will facilitate the implementation of all other activities. Program planning funds will primarily support neighborhood outreach in income eligible areas. General administration funds will be spent in support of the overall CDBG program.

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator

Table 54 – Goals Summary

#### Goal Descriptions

<b>1</b>	<b>Goal Name</b>	Housing Rehabilitation Multi Unit
	<b>Goal Description</b>	In program year 2020, approximately 62% of the CDBG budget will be used for multi unit housing rehabilitation, including energy efficiency improvements, to be undertaken by a Community Based Development Organization. The objective is to create and preserve decent rental housing for low/moderate income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable neighborhoods. The goal is to rehab four units each program year. CDBG funds will likely be a secondary funding source, used with HOME and/or LIHTC.

2	<b>Goal Name</b>	Housing Rehabilitation Single Unit
	<b>Goal Description</b>	The loan/grant program for owner-occupied housing rehabilitation will continue in program year 2020, with a goal of providing assistance to eight units per year, using approximately 20% of the program year 2020 budget. One goal of investing in owner-occupied rehabilitation is to stimulate investment by landlords in the area so that rental properties are also improved. Owner-occupied rehabilitation preserves existing housing at a much lower cost than new construction, and rehabilitation may encourage private investment in maintenance and rehabilitation by neighbors. This program assists elderly residents and people with special needs to continue living in their homes and neighborhoods. The objective is to support the retention of decent housing, with the outcome of affordable rehabilitation services.
4	<b>Goal Name</b>	Public Service Grants
	<b>Goal Description</b>	In program year 2020, approximately 8% of the overall CDBG budget (funded at the 15% cap) will be used for public service grants, with the objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals, with the outcomes of available and affordable access to housing and services, such as primary healthcare, mental health services, early childhood education, transportation and daily nutrition programs.
5	<b>Goal Name</b>	Homeless Facilities
	<b>Goal Description</b>	In program year 2020 CDBG funding for homeless facilities will be used to support a daily lunch and healthy snack program at Goshen Interfaith Hospitality Network. The objective for support of homeless facilities is to provide decent housing and a suitable living environment, with the outcomes of the housing and related services being available and affordable.

7	<b>Goal Name</b>	Public Service Activities- Urgent Needs
	<b>Goal Description</b>	<p>In program year 2020, approximately 96.8% of the CDBG-CV budget will be used for public service activities to prevent, prepare for and respond to coronavirus. This goal is designed to alleviate existing conditions caused by the coronavirus, which pose a serious and immediate threat to the health and welfare of the community, which is of recent origin, and for which the City of Goshen is unable to provide funding. The City of Goshen will use the origin of the public health emergency as declared by the U.S. Department of Health and Human Services press release issued January 31, 2020, and retroactive to January 27, 2020. The City aims to expend these funds as quickly as possible in an effort to meet community need. Within this goal, the objective is to promote a suitable living environment in the midst of a public health crisis for low/moderate income individuals and families. The intended outcomes are to increase availability/accessibility and improve affordability of services, including primary healthcare, mental health supportive services, early childhood education, senior services and daily nutrition programs. Furthermore, the public service activity with the additional allocation of CV funds (Short-Term Rent and Utility Assistance Program) will address the identified need of promoting housing opportunities by meeting the objective of creating a suitable living environment by expanding housing assistance. The intended outcomes of this project are to make housing more affordable for renters financially affected by the coronavirus, preventing homelessness and/or utility disconnect.</p>

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

In program year 2020, the following projects are expected to receive CDBG funding, using \$272,823 of CDBG funds, \$45,000 of estimated program income, and \$279,165 of prior year resources, for a total 2020 CDBG budget of \$596,988:

- (1) Public service grants (\$49,000) for direct assistance to low and moderate income families to meet the objective of a suitable living environment, with the outcome of providing access to affordable services, such as a daily nutrition program, medication assistance, senior transportation, shelter meals, primary medical care, mental health services, and early childhood education;
- (2) Rehabilitation of single-family, owner-occupied housing (\$116,029) to meet the objective of decent housing, with the outcome of available and affordable rehabilitation of owner-occupied housing for low and moderate income Goshen homeowners;
- (3) Rehabilitation of multi-family, rental housing (\$372,000) to meet the objective of decent housing, with the outcomes of available and affordable access to high quality rental housing for Goshen renters, and support for sustainable and viable neighborhoods; and
- (4) Program planning and general administration (\$59,959).

In program year 2020, the following projects are expected to receive CDBG-CV funding, accounting for a total amount of the entitlement grant of \$294,514. These projects are denoted with a “CV” in front of the project name:

- (1) Public service activities (\$284,968) for direct assistance to low- and moderate-income families to prevent, prepare for and respond to the coronavirus, meeting the objective of creating a suitable living environment for low/moderate income individuals and families. The objective’s intended outcomes include increased availability, accessibility and affordability of services, such as primary healthcare, mental health support, early childhood education, senior support services and child/adolescent support services. The public service activity with the additional allocation of CV funds (Short-Term Rent and Utility Assistance Program) will address the identified need of increasing housing opportunities by meeting the objective of creating a suitable living environment by expanding housing assistance. The intended outcomes of this project are to make housing more affordable for renters financially affected by the coronavirus, preventing homelessness and/or utility disconnect.
- (2) Program general administration (\$9,546).

**Projects**

#	Project Name
1	Program Administration
2	Program Planning
3	Boys & Girls Club
4	Center for Healing & Hope
5	Council on Aging of Elkhart County
6	Elkhart County Clubhouse
7	Goshen Interfaith Hospitality Network
8	Maple City Health Care Center
9	Walnut Hill Early Childhood Center
10	Single Unit Housing Rehabilitation
11	Multi Unit Housing Rehabilitation
12	Energy Conservation-Multi Unit Housing Rehabilitation
13	CV- Program Administration
14	CV- Boys & Girls Club
15	CV- Council on Aging of Elkhart County
16	CV- Elkhart County Clubhouse
17	CV- Maple City Health Care Center
18	CV- Walnut Hill Early Childhood Center
19	CV- Short-Term Rent and Utility Assistance Program

**Table 55 – Project Information**

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

See attachment #6 titled "AP-35 Describe the reasons for allocation priorities and any obstacles to addressing underserved needs" in Grantee Appendices in AD-25



**AP-38 Project Summary**  
**Project Summary Information**

<b>1</b>	<b>Project Name</b>	Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Multi Unit Housing Rehabilitation Single Unit Public Service Grants Homeless Facilities
	<b>Needs Addressed</b>	Housing Opportunities Access to Services Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$52,959
	<b>Description</b>	Program administration to pay for staff, staff training, supplies and other administrative costs.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	General program administration funds will pay for staff, staff training, supplies and other administrative costs in support of the implementation and administration of the overall CDBG program.
<b>2</b>	<b>Project Name</b>	Program Planning
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Multi Unit Housing Rehabilitation Single Unit
	<b>Needs Addressed</b>	Housing Opportunities Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$7,000
	<b>Description</b>	Program planning, including neighborhood outreach, in support of the CDBG program and CDBG activities.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA

	<b>Location Description</b>	NA
	<b>Planned Activities</b>	Program planning in support of the CDBG program.
<b>3</b>	<b>Project Name</b>	Boys & Girls Club
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$7,400
	<b>Description</b>	Provide support for daily nutrition program at Boys & Girls Club.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 950 school-age, low/mod income children will benefit.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income individuals and families, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including access to a daily nutrition program at the Boys & Girls Club.
	<b>4</b>	<b>Project Name</b>
<b>Target Area</b>		
<b>Goals Supported</b>		Public Service Grants
<b>Needs Addressed</b>		Access to Services
<b>Funding</b>		CDBG: \$4,900
<b>Description</b>		Provide support for medication, lab supplies and lab testing for health clinic serving uninsured individuals and families.
<b>Target Date</b>		6/30/2021
<b>Estimate the number and type of families that will benefit from the proposed activities</b>		An estimated 1000 low/mod individuals without adequate health insurance will benefit.
<b>Location Description</b>		NA

	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income families and individuals, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including access to medication assistance and lab testing at Center for Healing & Hope.
5	<b>Project Name</b>	Council on Aging of Elkhart County
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$4,900
	<b>Description</b>	Provide support for senior transportation program.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 25 low/mod income senior citizens will benefit.
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income families and individuals, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including support for the senior transportation program at the Council on Aging of Elkhart County.
6	<b>Project Name</b>	Elkhart County Clubhouse
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$2,200
	<b>Description</b>	Provide support for daily support services program for individuals with mental illness.
	<b>Target Date</b>	6/30/2021

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 170 low/mod individuals who are considered disabled because of mental illness will benefit.
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income families and individuals, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including support for the mental health services at Elkhart County Clubhouse.
<b>7</b>	<b>Project Name</b>	Goshen Interfaith Hospitality Network
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homeless Facilities
	<b>Needs Addressed</b>	Housing Opportunities Access to Services
	<b>Funding</b>	CDBG: \$11,000
	<b>Description</b>	Provide support for shelter lunch and snack program.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 75 individuals, including homeless families with children and single females, will benefit.
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit homeless individuals, including families with children, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including support for the shelter meal and snack program at Goshen Interfaith Hospitality Network.
<b>8</b>	<b>Project Name</b>	Maple City Health Care Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$4,900

	<b>Description</b>	Provide support for integrated primary health care.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 2500 low/mod individuals will benefit.
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income families and individuals, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including access to affordable primary health care at Maple City Health Care Center.
<b>9</b>	<b>Project Name</b>	Walnut Hill Early Childhood Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$13,700
	<b>Description</b>	Provide support to supplement parent fees for early childhood education.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 8 low/mod income children will benefit.
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income families and individuals, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including access to early childhood education at Walnut Hill Early Childhood Center.
<b>10</b>	<b>Project Name</b>	Single Unit Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Single Unit

	<b>Needs Addressed</b>	Housing Opportunities Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$116,029
	<b>Description</b>	Rehabilitation of single-family, owner-occupied housing units, to improve housing for low- and moderate-income homeowners.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 8 low/mod homeowners will benefit.
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	The City intends to continue the loan/grant program for owner-occupied housing rehabilitation in program year 2020. One goal of investing in owner-occupied rehabilitation is to stimulate investment by landlords in the area so that rental properties are also improved. Owner-occupied rehabilitation preserves existing housing at a much lower cost than new construction, and rehabilitation may encourage private investment in maintenance and rehabilitation by neighbors. This program assists elderly residents and people with special needs to continue living in their homes and neighborhoods. The objective is to support the retention of decent housing, with the outcome of affordable rehabilitation services.
<b>11</b>	<b>Project Name</b>	Multi Unit Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Multi Unit
	<b>Needs Addressed</b>	Housing Opportunities Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$122,000
	<b>Description</b>	Rehabilitation of multi-family, rental housing units, to improve housing for low- and moderate-income renters.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated four households and housing units will benefit.
	<b>Location Description</b>	NA

	<b>Planned Activities</b>	Multi unit housing rehabilitation, to be undertaken by a Community Based Development Organization. The objective is to create and preserve decent rental housing for low/moderate income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable neighborhoods. CDBG funds will be a secondary funding source, used with HOME and/or LIHTC.
<b>12</b>	<b>Project Name</b>	Energy Conservation-Multi Unit Housing Rehabilitation
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Multi Unit
	<b>Needs Addressed</b>	Housing Opportunities Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$250,000
	<b>Description</b>	Energy conservation for multi-family, rental housing units, to maintain & preserve quality rental housing for low- and moderate-income renters.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 33 households and housing units will benefit.
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	Energy efficiency improvements for multi-unit affordable housing, to be undertaken by a Community Based Development Organization. The objective is to preserve affordable rental housing for low/moderate income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable neighborhoods.
<b>13</b>	<b>Project Name</b>	CV- Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Activities- Urgent Needs
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG-CV: \$9,546
	<b>Description</b>	Program administration to pay for staff, staff training, supplies and other administrative costs in the implementation of the CDBG-CV program
	<b>Target Date</b>	6/30/2021



	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	NA
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	General program administration funds will pay for staff, staff training, supplies and other administrative costs in support of the implementation and administration of the overall CDBG-CV program
<b>14</b>	<b>Project Name</b>	CV- Boys & Girls Club
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Activities- Urgent Needs
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG-CV: \$14,550
	<b>Description</b>	Provide support for the expansion of a public service to prevent, prepare for and respond to the coronavirus by accommodating virtual learning and parents working outside the home during this crisis
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 100 school-age, low/mod income children will benefit.
	<b>Location Description</b>	NA
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of a service program designed to benefits low/moderate income individuals and families, targeting the objective of promoting a suitable living environment with the outcome of making services available, accessible and affordable. The School Year Breakfast Program is a new program implemented in response to the coronavirus and the changes to the school year schedule/teaching modality that have been required in an effort to prevent further spread.
<b>15</b>	<b>Project Name</b>	CV- Council on Aging of Elkhart County
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Activities- Urgent Needs
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG-CV: \$21,918

	<b>Description</b>	Provide support for the expansion of a public service to prevent, prepare for and respond to the coronavirus by serving seniors who are quarantining at home as well as preventing further spread by maintaining safety and cleanliness protocols in vehicles for their transportation service
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 60 low/mod senior citizens will benefit.
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of a service program designed to benefits low/moderate income seniors, targeting the objective of promoting a suitable living environment with the outcome of making services available, accessible and affordable. The COVID-19 Support Services Program is a new program implemented in response to the coronavirus to assist seniors quarantining at home with grocery and pharmacy deliveries as well as the increase in safety and cleanliness protocols in their vehicles necessary to prevent further spread.
<b>16</b>	<b>Project Name</b>	CV- Elkhart County Clubhouse
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Activities- Urgent Needs
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG-CV: \$2,600
	<b>Description</b>	Provide support for the expansion of a public service to prevent, prepare for and respond to the coronavirus by serving individuals with mental illness
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 50 low/mod individuals who are considered disabled because of mental illness will benefit.
	<b>Location Description</b>	N/A

	<b>Planned Activities</b>	Funding in this category will contribute to direct support of a service program designed to benefits low/moderate income individuals with mental illness, targeting the objective of promoting a suitable living environment with the outcome of making services available, accessible and affordable. The Weekly Care Package Program is a new program implemented in response to the coronavirus to assist individuals who have been struggling and are at increased risk due to isolation and lack of structure caused by the pandemic.
<b>17</b>	<b>Project Name</b>	CV- Maple City Health Care Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Activities- Urgent Needs
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG-CV: \$100,000
	<b>Description</b>	Provide support for the expansion of integrated primary health care services to prevent, prepare for and respond to the coronavirus
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 3,500 low/mod individuals and families will benefit.
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of a service program designed to benefits low/moderate income individuals and families with the objective of promoting a suitable living environment with the outcome of making services available, accessible and affordable. The Primary Care Expansion Program is a significant expansion of an existing program to prevent, prepare for and respond to the coronavirus by increasing access and affordability of primary health care services at Maple City Health Care Center.
<b>18</b>	<b>Project Name</b>	CV- Walnut Hill Early Childhood Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Activities- Urgent Needs
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG-CV: \$15,900

	<b>Description</b>	Provide support for an increase in demand for fee subsidies for early childhood education in response to the coronavirus
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 8 low/mod income children will benefit.
	<b>Location Description</b>	N/A
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of a service program designed to benefits low/moderate income individuals and families, targeting the objective of promoting a suitable living environment with the outcome of making early childhood education services available, accessible and affordable. The Supplement to Family Fees Program is an expansion of an existing program in response to the coronavirus due to an increase in demand for fee subsidies by parents who have had their income affected by the coronavirus.
19	<b>Project Name</b>	CV- Short-Term Rent and Utility Assistance Program
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Activities- Urgent Needs
	<b>Needs Addressed</b>	Housing Opportunities
	<b>Funding</b>	CDBG-CV: \$130,000
	<b>Description</b>	Applicant-based program providing emergency payments on behalf of low/moderate income individuals or families affected by the coronavirus for the purpose of preventing homelessness and/or utility disconnect.
	<b>Target Date</b>	6/30/2021
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 60 low/mod persons affected by the coronavirus will benefit.
	<b>Location Description</b>	N/A

	<b>Planned Activities</b>	The City will be implementing a Short-Term Rent and Utility Assistance Program assisting eligible applicants who have experienced financial hardship as a result of the coronavirus with up to 6 months of emergency rent and/or utility payments. This activity will support the objective of creating a suitable living environment by expanding housing assistance with the outcomes of making housing more affordable for renters, preventing homelessness and utility disconnect.
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## AP-50 Geographic Distribution – 91.220(f)

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

Goshen's population is contained within ten Census tracts (1, 2, 3.01, 3.02, 4, 5.01, 5.02, 6, 13 and 20). Based on the 2019 low/mod income summary data (LMISD) released by HUD for CDBG, effective April 1, 2019, four Census tracts, 1, 2, 3.02, and 5.02 contain the highest percentage of low/mod income population, with a total of seven of the 14 block groups within the four Census tracts containing 51% or more low/mod income population, making them income eligible areas for CDBG. These income eligible areas are block group 2 in Census tract 1, block groups 1, 3 and 4 in Census tract 2, block groups 2 and 3 in Census tract 3.02, and block group 1 in Census tract 5.02. A map of the seven income-eligible block groups is provided as an attachment.

Census 2010 data indicate that Goshen's population is 78.2% White, 2.6% Black/African American, 1.2% Asian, 0.5% American Indian/Alaska Native, and 28.1% Hispanic/Latino. The 2007-2011 CHAS data for housing problems by race and percent AMI do not show any disproportionately greater need for any racial or ethnic group in comparison to the needs as a whole. Based on the 2007-2011 CHAS data, housing problems in Goshen are distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole.

Starting in program year 2020, CDBG area-based activities will not be focused in a specific neighborhood, but may occur in any CDBG income eligible area. Income eligible areas tend to be older neighborhoods near the central city, often with deteriorating housing and infrastructure due to age and/or neglect. The goal will continue to be implementation of CDBG activities through neighborhood based community development, with a mix of housing and development activities and neighborhood outreach. Lacasa's neighborhood outreach worker will work with neighborhood associations in income eligible areas, to strengthen neighborhood capacity and to facilitate the implementation of CDBG activities. CDBG funds alone are not adequate to implement large-scale projects, so leveraging CDBG funds as part of larger housing projects undertaken by a Community Based Development Organization will broaden the use of CDBG funds and help address the need for quality affordable housing for both renters and owners.

### Geographic Distribution

Target Area	Percentage of Funds

Table 56 - Geographic Distribution

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

The City of Goshen CDBG program uses a neighborhood-based community development approach, with a mix of housing and development activities supported by neighborhood outreach. Outreach strengthens neighborhood capacity and facilitates the implementation of CDBG activities. This provides maximum impact, with project funds reaching more families, and additional long-term costs to the City reduced through the strengthening of neighborhood associations. CDBG funds alone are not adequate to implement large-scale projects, so leveraging CDBG funds as part of larger housing projects undertaken by a Community Based Development Organization will broaden the use of CDBG funds and help address the need for quality affordable housing for both renters and owners.

### **Discussion**

The City of Goshen will implement the community development priorities in the context of a neighborhood-based community development strategy, with the primary objective of creating a suitable living environment, with the outcome of a more sustainable and livable neighborhood. Starting in program year 2020, CDBG area-based activities will not be focused in a specific neighborhood, but may occur in any CDBG income eligible area. Income eligible areas tend to be older neighborhoods near the central city, often with deteriorating housing and infrastructure due to age and/or neglect.

The neighborhood-based community development strategy has been used successfully in previous CDBG program years, and will continue with a mix of housing and development activities supported by neighborhood outreach. Outreach strengthens neighborhood capacity and facilitates the implementation of CDBG activities. This provides maximum impact, with project funds reaching more families, and additional long-term costs to the City reduced through the strengthening of neighborhood associations.

## Affordable Housing

### AP-55 Affordable Housing – 91.220(g)

#### Introduction

As a way to remove barriers to affordable housing, the City has provided tax phase-ins, grants, loans and assistance for projects which have rehabilitated deteriorating housing or redeveloped brownfield sites, creating affordable housing for low and moderate income persons. The City also provided a loan to Lacasa to be used in Lacasa's Revolving Real Estate Development Fund, which was established with the intent to acquire, rehabilitate and return to homeownership run-down, often vacant, investment properties. Within neighborhoods, residents often cite vacant and dilapidated properties as a major concern, and this fund seeks to address the worst of these problem properties. Potential homebuyers have access to Lacasa's homeownership classes, financial training, and a matched savings program.

The City has also partnered with local agencies and other units of local government to pursue grant funding, such as a successful Neighborhood Stabilization Program Round 1 (NSP1) grant, to develop affordable housing.

The City is not aware of any local ordinances or policies which create unreasonable barriers to affordable housing. The City will continue to explore incentives and opportunities available for the development of affordable housing, and will continue to use local public resources for infrastructure improvements to enhance living conditions in low/moderate income neighborhoods. Efforts will continue to preserve existing affordable housing and create new affordable housing, through housing rehabilitation and new construction.

Cost burden is the most significant housing issue, for both owners and renters. For owners, excessive cost burden means that maintenance and improvements are often deferred, resulting in the need for rehab assistance. Renters with excessive cost burden may require rental assistance to ensure stable housing.

Strategies to address barriers include rehab of multi unit rental housing, rehab of owner-occupied housing, construction of new affordable housing, upgrades to infrastructure and new infrastructure to complement housing activities, rental assistance for low income tenants and the homeless, and assistance for homeless persons and persons with special needs.

Strategies are implemented cooperatively, with a past example a \$2.1 million NSP1 grant, an application by the City, in partnership with Lacasa and Habitat for Humanity. Implementation was completed in PY 2016, with 14 single-family homes rehabbed/redeveloped, one multi-family (six-unit) rehabbed, and six uninhabitable residential properties demolished.

Permanent supportive housing (PSH) is a partnership of Lacasa, the owner/developer, and Oaklawn, the



service provider, with a total of 29 units in Goshen at two locations.

In PY 2019 construction began for a new PSH project in the City of Elkhart, Benham Avenue Apartments, to provide 11 new housing units and supportive services for chronically homeless. Occupancy will begin in April 2020. Funding for the \$1.8 million project includes HOME, Housing Trust Fund, and IHCD Development Fund, with rental assistance through Shelter+Care vouchers. The project is another partnership of Lacasa and Oaklawn. PSH is a successful model that provides stable housing and supportive services.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	29
Non-Homeless	140
Special-Needs	33
Total	202

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

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	173
The Production of New Units	0
Rehab of Existing Units	45
Acquisition of Existing Units	0
Total	218

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

**Discussion**

Census 2010 data indicate that Goshen's population is 78.2% White, 2.6% Black/African American, 1.2% Asian, 0.5% American Indian/Alaska Native, and 28.1% Hispanic/Latino. The 2007-2011 CHAS data for housing problems by race and percent AMI do not show any disproportionately greater need for any racial or ethnic group in comparison to the needs as a whole. Based on the 2007-2011 CHAS data, housing problems in Goshen are distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole.

*Priority #1: Rehabilitation of Multi Unit Rental Housing (Low/mod income renters 0-80% AMI)*

In PY 2020, the CDBG program expects to rehab approximately 37 rental housing units, through multi unit rehab, including energy conservation, to be undertaken by a CBDO. The objective is to create and preserve high quality affordable rental housing for low/moderate income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable neighborhoods. CDBG funds will be a secondary funding source, used with HOME

and/or LIHTC.

*Priority #2: Rehabilitation of Owner-occupied Homes (Low/mod income owners 0-80% AMI)*

In PY 2020, the goal is to rehab 8 owner-occupied homes, with CDBG funds matched with local, state and federal funds, and private and in-kind donations and volunteer labor. This program targets low/mod income elderly, persons with disabilities, and large and small related households. Assistance is primarily in the form of deferred loans. Owner-occupied rehab is available citywide. Rehab preserves existing housing and encourages private investment in maintenance and rehab in the neighborhood. The owner-occupied rehab program also assists elderly residents and people with special needs to continue living in their homes.

*Priority #3: Rental Assistance (Low income tenants, non-homeless & special needs, 0-50% AMI)*

Warsaw Housing Authority (WHA) administers a housing choice voucher program that includes vouchers for Goshen. Goshen Housing Authority was dissolved in November 2018, and Goshen vouchers were absorbed by WHA. WHA has committed to maintaining housing choice voucher assistance in Goshen. One-year goals for PY 2020 shown in Table 64 and Table 65 are based on the 173 Housing Choice vouchers currently in use, including 140 regular vouchers and 33 NED (non-elderly disabled) vouchers for persons with disabilities.

*Priority #4: Homeless Persons and Persons with Special Needs*

Support for homeless persons and persons with special needs will continue in PY 2020 through support for emergency shelter and permanent supportive housing (PSH). PSH in Goshen is a partnership of Lacasa, the owner/developer, and Oaklawn, the service provider, with a total of 29 PSH units at two sites.

In PY 2019, construction began on a new PSH project in the City of Elkhart, Benham Avenue Apartments, to provide 11 new housing units and supportive services for chronically homeless. Occupancy is expected to begin in April 2020. Funding for the \$1.8 million project includes HOME, Housing Trust Fund, and IHEDA Development Fund, with rental assistance provided through Shelter+Care vouchers. The PSH project is another partnership of Lacasa and Oaklawn.

## **AP-60 Public Housing – 91.220(h)**

### **Introduction**

There are no public housing units within the City of Goshen. The City of Goshen will continue to work with Warsaw Housing Authority (WHA), Lacasa, Oaklawn Mental Health Center, Greencroft Goshen, Habitat for Humanity, Council on Aging, City of Elkhart, Elkhart County, and other local organizations to address housing and related needs.

Warsaw Housing Authority administers a budget of approximately \$1.3 million for Goshen housing choice vouchers, with approximately 173 vouchers currently in use, including 33 NED (non-elderly disabled) vouchers for persons with disabilities.

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

There is strong local support for maintaining access to housing choice vouchers, and WHA has committed to maintaining housing choice voucher assistance in Goshen.

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

There are no public housing units in Goshen. Warsaw Housing Authority (WHA) operates a Housing Choice voucher program, including vouchers for Goshen, which were absorbed when Goshen Housing Authority was dissolved in 2018. WHA works closely with other agencies who provide services for low- and moderate-income families, and have been working with volunteers in Goshen who are providing case management. WHA operates a Good Housekeeping Award program, initiated in 2015, to promote pride in housing and to encourage tenants to keep units clean and immediately report maintenance issues rather than waiting for an inspection. In 2019 nearly 70% of WHA clients received a Good Housekeeping award. WHA is currently in the process of adding homeownership vouchers for a first-time homebuyer program.

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

Not applicable.

### **Discussion**

In addition to the Housing Choice voucher program, subsidized housing available in Goshen includes 267 Section 8 units at Greencroft Goshen, which are all income-based rental units for the elderly. Also in Goshen is Maple Leaf Commons, a 41-unit Section 202 PRAC for elderly, and Mercer Manor, which has 15 income-based rental units (supported by USDA Rural Development). Lacasa is the general partner and property manager of a 72-unit Low-Income Housing Tax Credit project, Arbor Ridge Apartments.

The Hattle Hotel and Shoots Building, two deteriorating rooming houses that were renovated, provide a total of 28 affordable rental units, with efficiency, one- and two-bedroom units.

In program year 2011, construction was completed for a 60-unit apartment complex, Maple Court Place, affordable for low/moderate income persons, with six (6) one-bedroom apartments, 24 two-bedroom apartments, 24 three-bedroom apartments and six (6) four-bedroom apartments. The \$7.6 million Low-Income Housing Tax Credit project was completed in December 2011, and was occupied beginning in March 2012.

Permanent supportive housing (PSH) in Goshen is a partnership of Lacasa, the owner/developer, and Oaklawn Mental Health Center, the service provider, with a total of 29 PSH units at two sites, Westplains Apartments and Lincoln Avenue West Apartments. Rental assistance is provided through Shelter+Care vouchers.

In program year 2019, construction began for a new permanent supportive housing (PSH) project in the City of Elkhart, Benham Avenue Apartments, to provide 11 new housing units and supportive services for chronically homeless. Occupancy is expected to begin in April 2020. Funding for the \$1.8 million project includes HOME, Housing Trust Fund, and IHEDA Development Fund, with rental assistance provided through Shelter+Care vouchers. The PSH project is another partnership of Lacasa, the owner/developer, and Oaklawn Mental Health Center, the service provider.

Hawks Arts and Enterprise Center, which is providing 33 affordable housing units, is a \$6.8 million LIHTC project, fully occupied at the time of opening in April 2015. The project included HOME and FHLB funds.

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

### **Introduction**

Advocacy, education and coordination of housing and homeless programs in Indiana is managed by the Indiana Housing & Community Development Authority (IHCDA), through the regional Continuum of Care (CoC) network. Goshen, located in Elkhart County, is part of Region 2 CoC, and actively participates with the Indiana Region 2 Homeless Coalition, which meets bi-monthly. Goshen's CDBG administrator serves on the executive committee of the CoC. The City of Goshen does not expect to receive any direct public or private funding in program year 2020 to address homeless needs and to prevent homelessness.

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

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

Specific steps being taken to eliminate chronic homelessness include the following:

1. A total of 29 units of permanent supportive housing have been constructed and occupied in Goshen;
2. In program year 2019, construction began for a new permanent supportive housing (PSH) project in the City of Elkhart, Benham Avenue Apartments, to provide 11 new housing units and supportive services for chronically homeless. Occupancy is expected to begin in April 2020. Funding for the \$1.8 million project includes HOME, Housing Trust Fund, and IHCDA Development Fund, with rental assistance provided through Shelter+Care vouchers. The PSH project is another partnership of Lacasa, the owner/developer, and Oaklawn Mental Health Center, the service provider.
3. Agencies outside the City of Goshen, such as Oaklawn Mental Health Center, Elkhart County Clubhouse, Salvation Army, The Window, and Elkhart Township Trustee's office, will continue to provide supportive services to the chronically homeless population;
4. The Indiana Region 2 Homeless Coalition will continue to work with IHCDA to increase the effectiveness of the Region 2 Continuum of Care; and
5. The City of Goshen, City of Elkhart, Faith Mission, Lacasa, Oaklawn Mental Health Center, Goshen Interfaith Hospitality Network, Habitat for Humanity, and other local agencies will continue to hold regular discussions and work together to address issues related to chronic homelessness.

#### **Addressing the emergency shelter and transitional housing needs of homeless persons**

Within Elkhart County, emergency shelter for homeless individuals and families is provided by Faith Mission, located in the City of Elkhart. In Goshen, emergency shelter for families and single women is provided by Goshen Interfaith Hospitality Network (GIHN). Emergency shelter for victims of domestic

violence is provided by the YWCA Safe Haven Women's Shelter, with a total of 82 beds available for households with children and 95 beds available for households with no children. Permanent supportive housing (PSH) is provided in Elkhart County by AIDS Ministries and Oaklawn Mental Health Center, with 29 fixed-site PSH units in Goshen, and an additional 38 fixed and scattered site (vouchers) beds in Elkhart County. Transitional housing for homeless households is provided by Emerge Ministries, located in the City of Elkhart, with a total of 16 beds, serving households with and without children. Faith Mission operates transitional housing in the City of Elkhart, with a total of 30 beds, serving households with children.

Families and individuals who are homeless have few resources and little money to stabilize their situation while they try to find work and a place to live. Often families are forced to rent substandard or overcrowded housing units because they do not have rental or utility deposits and are not able to earn enough to find housing that meets their needs. Transitional housing programs provide services, support and training to assist families and individuals toward stability. In Elkhart County, transitional housing is provided by Emerge Ministries, SPA Ministries, and Faith Mission, with a total of 46 beds for households with children and 18 beds for households without children. None of the transitional housing units are located in Goshen.

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

Two permanent supportive housing (PSH) projects have been constructed in Goshen. The first PSH project, Lincoln West Apartments, contains 14 units, and was completed in December 2011 and fully occupied by March 2012. The second PSH project, Westplains Apartments, with 15 units, was completed in January 2014 and was fully occupied by March 2014. The PSH projects are a partnership of Lacasa, the owner/developer, and Oaklawn Mental Health Center, the service provider. A new Lacasa-Oaklawn PSH project with 11 units in the City of Elkhart was under construction in PY 2019, with occupancy expected to begin in April 2020.

Permanent supportive housing is also provided by AIDS Ministries, with a program serving families and individuals in Elkhart County, with housing located in the City of Elkhart. This program provides housing and supportive services, with six beds for individuals and two beds for families with children.

The Indiana Region 2 Homeless Coalition is a group of agencies and organizations interested in homelessness who meet regularly to share data and information on homelessness, facilitate dialogue among service providers, and coordinate community resources and services for the benefit of individuals and families who are homeless or in imminent danger of becoming homeless, thereby reducing homelessness. The Coalition has participation from a large number of local agencies, which

during calendar year 2019 included AIDS Ministries, Anthem Indiana Medicaid, Beaman Home, Brightpoint, Community Foundation of Elkhart County, Concord Schools, Elkhart Chamber, Elkhart City, Elkhart Community Schools, Elkhart County Special Education Cooperative, Elkhart Education Foundation, Emerge Ministries, Faith Mission, Goodwill, Goshen City, Goshen Community Schools, Goshen Interfaith Hospitality Network, Guidance Ministries, Habitat for Humanity of Elkhart County, Heart City Health Center, Humble House Ministries, IHADA, Lacasa, Managed Health Services, Maple City Health Care Center, MDwise, Oaklawn Mental Health Center, Salvation Army Goshen, Senator Todd Young's office, SPA Women's Ministry, Veteran's Administration, and YWCA of Northern Indiana. The Coalition and direct connections with participating agencies is the primary structure through which the City of Goshen will carry out its homelessness strategy.

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

The most direct method of preventing homelessness for the City is the Housing Choice Voucher program. Warsaw Housing Authority (WHA) operates a Housing Choice voucher program, which includes vouchers for Goshen. Goshen Housing Authority was dissolved in November 2018. The Housing Choice voucher annual budget for Goshen has been approximately \$1.3 million, with approximately 173 vouchers currently in use, including 33 for persons with disabilities.

At the present time, there is not a coordinated discharge policy in place for Elkhart County. In the past, this has been discussed at the Indiana Region 2 Homeless Coalition and will continue to be a goal that is pursued. Previously, the Indiana Coalition on Housing and Homeless Issues, now subsumed through IHADA, developed an action plan to end chronic homelessness, which includes a strategy to ensure that individuals are not released from institutions into homelessness. This plan was presented and discussed at the Indiana Region 2 Homeless Coalition.

Several years ago the Elkhart County Sheriff's Department initiated a re-entry initiative, Elkhart County Reentry Initiative (ECRI). The goal is to reduce recidivism, which is estimated at 30-70% for Elkhart County, which has 700 inmates per year coming back to Elkhart County from prison. The reentry initiative is intended to facilitate networking with resources, to help remove barriers to successful reentry. Some of the challenges faced by individuals returning to the community from prison are employment, education, housing, transportation, access to resources, health (addictions/mental illness/physical), accountability and a changing world. ECRI is providing training for mentors, accountability partners or transitional coaches to help individuals with reentry challenges.

## **Discussion**

Currently, the system to address homelessness and the priority needs of homeless persons and families operates mostly informally through the cooperation of local agencies providing housing and services, and formally through the Indiana Region 2 Homeless Coalition (the local Continuum of Care), which meets bi-monthly to network around issues related to homelessness and to empower local agencies addressing homelessness. Goshen's CDBG administrator serves on the CoC executive committee, and will continue to regularly participate with this group. Support will also continue for local agencies providing services to homeless families and individuals, and those at imminent risk of becoming homeless, including prevention of homelessness, outreach, emergency shelter, case management, transitional housing and permanent supportive housing.



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

### **Introduction:**

As a way to remove barriers to affordable housing, the City has provided a variety of support, including \$162,000 invested by the Redevelopment Commission in the Hawks Arts & Enterprises property for demolition and cleanup, which was renovated by Lacasa to provide 33 units of affordable housing, and a tax phase-in and a grant of \$100,000 for a project which rehabilitated two deteriorating rooming houses to create 28 apartments affordable for low and moderate income persons. In program year 2007, the City also provided a five-year \$500,000 loan to Lacasa, extended for another five years in August 2012, and again in January 2017, to be used in Lacasa's Revolving Real Estate Development Fund. The fund was established with the intent to acquire, rehabilitate and return to homeownership vacant investment properties. Within neighborhoods, residents often cite vacant and dilapidated properties as a major concern, and this fund seeks to address the worst of these problem properties. Potential homebuyers have access to Lacasa's homeownership and financial fitness classes, and funding through Lacasa's affordable housing loan pool would be available to those who qualify.

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

The City is not aware of any local ordinances or policies which create unreasonable barriers to affordable housing. The City will continue to explore incentives and opportunities available for the development of affordable housing, and will continue to use local public resources for infrastructure improvements to enhance living conditions in low/moderate income neighborhoods. Efforts will continue to preserve existing affordable housing and create new affordable housing, through housing rehabilitation and new construction.

As has been discussed, cost burden is the most significant housing issue, for both owners and renters. For owners, excessive cost burden means that maintenance and improvements are often deferred, resulting in the need for owner-occupied housing rehabilitation assistance. Renters with excessive cost burden may require rental assistance in order to have stable housing.

Census 2010 data indicate that Goshen's population is 78.2% White, 2.6% Black/African American, 1.2% Asian, 0.5% American Indian/Alaska Native, and 28.1% Hispanic/Latino. The 2007-2011 CHAS data for housing problems by race and percent AMI do not show any disproportionately greater need for any racial or ethnic group in comparison to the needs as a whole. Based on the 2007-2011 CHAS data, housing problems in Goshen are distributed evenly by race, as compared to the overall racial and ethnic makeup of the total population. There are no disproportionately greater needs for any racial or ethnic group in comparison to the needs as a whole.

## Discussion:

Cost burden is the most significant housing issue, for both owners and renters. For owners, excessive cost burden means that maintenance and improvements are often deferred, resulting in the need for rehab assistance. Renters with excessive cost burden may require rental assistance to ensure stable housing.

Strategies to address barriers include rehab of multi unit rental housing, rehab of owner-occupied housing, construction of new affordable housing, upgrades to infrastructure and new infrastructure to complement housing activities, rental assistance for low income tenants and the homeless, and assistance for homeless persons and persons with special needs.

Strategies are implemented cooperatively, with a past example a \$2.1 million NSP1 grant, an application by the City, in partnership with Lacasa and Habitat for Humanity. Implementation was completed in PY 2016, with 14 single-family homes rehabbed/redeveloped, one multi-family (six-unit) rehabbed, and six uninhabitable residential properties demolished.

Permanent supportive housing (PSH) is a partnership of Lacasa, the owner/developer, and Oaklawn, the service provider, with a total of 29 units in Goshen at two locations.

In PY 2019 construction began for a new PSH project in the City of Elkhart, Benham Avenue Apartments, to provide 11 new housing units and supportive services for chronically homeless. Occupancy will begin in April 2020. Funding for the \$1.8 million project includes HOME, Housing Trust Fund, and IHEDA Development Fund, with rental assistance through Shelter+Care vouchers. The project is another partnership of Lacasa and Oaklawn. PSH is a successful model that provides stable housing and supportive services.

Current activities, projects and efforts to remove barriers include:

- Westplains II, a Lacasa/Oaklawn project, to increase affordable rental options, with 5 units  $\leq$  40% AMI and 3 units  $\leq$  60% AMI, to divert Oaklawn clients from homelessness and provide independent options for clients who would otherwise be underhoused.
- A Lacasa project with 2 units at 102 N 9th, to increase rental housing options, with each 3-bedroom unit for families  $\leq$  60% AMI.
- A \$1.4 million Lacasa project for rehab of 5 multi-family dwellings in East Lincoln Crossroads to provide 20 quality rental units. Three of the 5 properties were completed in 2018.
- Lacasa financial empowerment services include financial training/coaching, matched savings, homebuyer training, and workplace financial empowerment.
- A Lacasa workforce housing development project, to address a shortage of affordable housing, with Indiana modular units placed in the City of Elkhart.
- A Lacasa HOME Innovation Grant, for affordable housing construction and/or rehab in 3 neighborhoods, Goshen, City of Elkhart, and Elkhart County. The program includes pre-purchase

counseling, home ownership training, financial education, and matched savings.

- Lacasa submitted an application for The Oaks, requesting \$834,000 in tax credits and \$400,000 HOME funds, for construction of 40 two, three, and four bedroom units, with 20 multi-family units and 14 attached single units in an existing undeveloped subdivision, and six single houses on infill lots. The application was not funded.

Past LIHTC projects have included Hawks Arts and Enterprise Center, a \$6.8 million project, using HOME and FHLB funding, fully occupied when open in April 2015, providing 33 affordable units, and Maple Court Place, a \$7.6 million project, completed in December 2011, with 6 one-bedroom units, 24 two-bedroom units, 24 three-bedroom units, and 6 four-bedroom units.

Cooperative efforts to address barriers include a countywide housing needs assessment undertaken by the City of Goshen, City of Elkhart, Elkhart County, Lacasa and Habitat for Humanity, completed in PY 2014.

## **AP-85 Other Actions – 91.220(k)**

### **Introduction:**

The 2020-2024 five-year consolidated CDBG plan includes the following priorities, which will guide the choice of specific activities and actions for program year 2020:

#### 1) Housing Opportunities

- Improve owner-occupied housing through rehab
- Increase quality of rental housing
- Increase transitional housing options
- Reduce housing cost burden through higher wage job opportunities and job training
- Provide permanent supportive housing for chronically homeless
- Support affordable housing creation and preservation
- Provide emergency shelter for homeless individuals and families
- Expand housing options and assistance
- Maintain and facilitate use of Housing Choice voucher program

#### 2) Access to Services

- Increase access to affordable healthcare
- Increase services for mentally ill
- Support programs for youth
- Increase access to affordable childcare and early childhood education
- Support services for elderly and the disabled
- Support public transportation
- Provide emergency shelter for homeless individuals and families
- Provide permanent supportive housing for chronically homeless
- Support counseling/advocacy for underserved populations
- Increase access to substance abuse prevention and treatment
- Support life skill development
- Support nutrition programs and food assistance

#### 3) Neighborhood Revitalization

- Improve owner-occupied housing through rehab
- Remove blighted residential properties
- Address issue of vacant/foreclosed houses
- Increase quality of rental housing

- Support public infrastructure projects
- Repair/replace existing sidewalks
- Support neighborhood parks

### **Actions planned to address obstacles to meeting underserved needs**

Within the areas eligible for CDBG funding, obstacles to meeting underserved needs include an inadequate amount of CDBG funding, lack of participation by landlords who own property in the area, and lack of awareness and lack of participation by neighborhood residents. These obstacles to meeting underserved needs will be addressed primarily through the cooperative implementation of the CDBG plan, with the City, local public service organizations, Lacasa, Habitat for Humanity, and the individuals and families in the neighborhoods working together. Part of the strength of the Goshen CDBG program is a result of the positive working relationships between the City and local partners, including other public agencies, non-profit agencies, and neighborhood residents. Lacasa's neighborhood outreach worker and the City's neighborhood association coordinator will continue to work together to develop and strengthen neighborhood associations. There are organized neighborhood associations in the majority of CDBG income eligible areas, and outreach efforts will support and strengthen these organizations. When neighborhood associations are active, residents work together to improve their neighborhood and the implementation of the CDBG program is more effective.

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

Actions planned to foster and maintain affordable housing include rehabilitation of multi unit rental housing, rehabilitation of owner-occupied housing for low/mod income homeowners, construction of new affordable housing, upgrades to infrastructure and new infrastructure to complement housing activities, rental assistance for low income tenants and the homeless, and assistance for homeless persons and persons with special needs.

Affordable housing strategies are implemented as a cooperative effort, with a past example being a \$2.1 million Neighborhood Stabilization Program Round 1 (NSP1) grant, which was an application by the City, in partnership with Lacasa and Habitat for Humanity. Implementation of the NSP1 grant was completed in PY 2016, with 14 single-family homes rehabilitated/redeveloped (12 owner-occupied and two rental occupied), one multi-family home (six-unit) rehabilitated and fully occupied as a rental property, and six uninhabitable residential properties demolished.

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

In program year 2011, a \$2.4 million Lead Hazard Control Grant was awarded to Elkhart County (in May 2012) from the Department of Housing & Urban Development, with the goal of addressing lead hazards in approximately 140 housing units in Elkhart County, including the City of Goshen. This follows successful completion of a three-year, \$3 million lead hazard grant awarded to Elkhart County, with the

City of Goshen providing assistance through an interlocal agreement. The lead hazard control grant completed in program year 2011 assisted 67 housing units in Goshen, out of a total of 197 units assisted countywide. The \$3 million grant was matched with approximately \$973,632 of local funds, in a three-year program which funded education, outreach and training, and addressed lead hazards in a total of 197 housing units. Major partners were Elkhart County Health Department and Lacasa, with many additional community partners, including the City of Goshen and City of Elkhart. This investment provides an additional positive impact within the CDBG target area and strengthens the overall community development efforts taking place within the City of Goshen.

As the City of Goshen has no city health department, the City is under the jurisdiction of the Elkhart County Health Department, which provides free lead screening tests, takes referrals from local physicians, and follows up with case management and environmental investigations. The Department employs licensed lead inspectors and conducts lead risk assessments and lead clearance exams. The Department's Community Health Nursing program manages lead cases and conducts lead screenings, along with education and outreach. Identified lead poison cases are reported to the State Board of Health, the property owner and the parents/guardian.

The City and Lacasa will continue to inspect for and address lead paint hazards in the housing rehabilitation program, and will provide participants with information regarding lead paint hazards. Based on information from the Health Department, education, blood testing and counseling may be the most cost-effective measures to lower cases of lead poisoning in children.

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

The antipoverty strategy will continue as in previous CDBG program years, as a component of each community development and housing objective, based on the assumption that the most effective tools for reducing poverty are stable housing, education, training and access to supportive services. These are all key components of housing activities, public service grants, and neighborhood-based community development efforts. CDBG assistance will be part of the overall strategy to provide households in poverty with the stability, services and support necessary for successful employment, such as transportation, rental housing assistance, case management, child care assistance and healthcare assistance. Homeownership training and financial fitness training will be available to neighborhood residents through the housing construction and rehabilitation programs.

The Housing Choice voucher program is an essential foundation of the City's housing strategy, as it assists families so that they pay no more than 30 percent of their gross income for rent and utilities. This reduces the need for constant shifting of housing units, and provides stability so children are able to remain in the same school for no less than one year. In addition to the Housing Choice voucher program, other affordable housing in Goshen includes 267 Section 8 elderly units at Greencroft Goshen, 41 units in Maple Leaf Commons, a Section 202 PRAC for elderly, 15 income-based rental units at Mercer Manor, supported by USDA Rural Development, Maple Court Place, a 60-unit apartment complex affordable for low/moderate income persons, 28 affordable units in the Shoots and Hattle buildings, 72 affordable

units at Arbor Ridge, and 29 units of fixed-site permanent supportive housing (PSH) in two locations. An additional six units of scattered site PSH were occupied in Goshen in PY 2018, designated for individuals with disabilities. New affordable housing, completed and fully occupied in PY 2014, was provided through a \$6.8 million LIHTC project, Hawks Arts and Enterprise Center, developed by Lacasa, providing 33 affordable units, a mix of one and two bedroom units.

### **Actions planned to develop institutional structure**

The City of Goshen's annual plan for program year 2020 will be carried out through the Planning office, Board of Public Works & Safety, Clerk Treasurer's office, Community Development Department, and Mayor's office, with primary responsibility for administration through the Planning Office. The Planning office will work closely with Lacasa to manage and implement the housing activities. The planning neighborhood outreach activity will be implemented by Lacasa.

Plan implementation will occur in close cooperation with a number of local non-profit and institutional partners, including Lacasa, Region 2 Continuum of Care, Boys & Girls Clubs of Elkhart County, Center for Healing & Hope, Council on Aging of Elkhart County, Elkhart County Clubhouse, Goshen Interfaith Hospitality Network, Maple City Health Care Center, Walnut Hill Early Childhood Center, Oaklawn Mental Health Center, Habitat for Humanity of Elkhart County, and Warsaw Housing Authority. In addition to active partners, many organizations are on the general CDBG contact list and receive regular information and requests for input. Neighborhood associations are also partners, and efforts will continue to strengthen the capacity of these groups and increase their participation with the CDBG program.

Strong partnerships exist between public, private, non-profit and institutional groups in Goshen. These relationships, which are facilitated through regular contact, ensure consistent implementation of the five-year and annual plans. One outcome of these partnerships has been several combined applications for grant funding, such as Neighborhood Stabilization Program Round 1, which was a partnership between City of Goshen, Habitat for Humanity and Lacasa. Although it was not funded, an NSP2 consortium application was submitted from City of Goshen, City of Elkhart and Lacasa. This demonstrates the level of cooperation and strong working relationships which exist and which strengthen the CDBG program.

There is close coordination with the local Continuum of Care (Indiana Region 2 Homeless Coalition), which meets bi-monthly to coordinate and discuss services to address and prevent homelessness in Elkhart County and Region 2. Goshen's CDBG administrator serves on the executive committee of the CoC. Input for the CDBG five-year and annual plans for both Goshen and Elkhart has been provided by the CoC.

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



Although opportunities for feedback are provided throughout the CDBG program year, during the planning process for each annual action plan a more formal effort is made to solicit input, following, at a minimum, the guidance provided by Goshen's Citizen Participation Plan. A list of more than 100 contacts from local housing and service providers, neighborhood association leaders, City of Goshen elected officials, City staff, Warsaw Housing Authority, local institutions such as Goshen Health, Greencroft Goshen, Oaklawn Mental Health Center, and Goshen Community Schools, and local media are notified of, and invited to, each public meeting, and are also provided notice of public hearings and notice of the availability of the draft plan and the public comment period. Notice of the availability of the annual plan is also provided to the local Continuum of Care (Indiana Region 2 Homeless Coalition), and public comment is encouraged.

Coordination between public and private housing, health and social service agencies will continue to be strengthened through regular interaction and meetings. Strong local networks are in place which address several priorities outlined in the CDBG plan. For example, the CDBG administrator participates in the Indiana Region 2 Homeless Coalition (IR2HC), which is a group of public and private agencies who meet bi-monthly to coordinate and discuss services to address and prevent homelessness in Elkhart County and Region 2. The IR2HC is the local Region 2 Continuum of Care, and Goshen's CDBG administrator serves on the executive committee of the CoC.

During program year 2013, the City of Goshen, City of Elkhart, Elkhart County, Lacasa and Habitat for Humanity worked together and shared resources to conduct a countywide housing needs assessment to gather information on housing availability and affordability, housing conditions, and future housing development priorities. The process included a resident housing survey and three strategy workshops, one in each jurisdiction. Input from the surveys and workshops were used to identify general strategies to address identified housing needs. The Elkhart County Housing Needs Assessment 2014 was completed in PY 2014.

### **Discussion:**

While there is always room for improvement, strong partnerships exist between public, private, non-profit and institutional groups in Goshen, and between the Goshen and Elkhart City CDBG programs. These relationships, which are developed, facilitated and maintained through regular contact, are a primary strength of Goshen's CDBG program, and ensure consistent implementation of the annual plan. One outcome of these partnerships has been several combined applications for grant funding, such as the successful application to IHCD for Neighborhood Stabilization Program Round 1, which was a partnership of the City of Goshen, Habitat for Humanity, and Lacasa. A countywide grant to provide housing rehabilitation assistance to elderly homeowners has also been funded, as a cooperative effort of Lacasa and the Council on Aging of Elkhart County. Additionally, in program year 2013 the City of Goshen, City of Elkhart, Elkhart County, Lacasa and Habitat for Humanity worked together and shared resources to conduct a countywide housing needs assessment. These examples demonstrate the level of cooperation and strong working relationships which exist, which will continue to be strengthened, and which will ensure the ongoing successful implementation of the CDBG annual plan.

## Program Specific Requirements

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

#### Introduction:

This CARES Act Amendment is being completed in response to the allocation provided to prepare, prevent and respond to the coronavirus pandemic. The CV-designated activities are all in response to an urgent need indicated by the full allocation amount of \$294,514. No program income is expected to be generated by these additional activities.

#### Community Development Block Grant Program (CDBG)

##### Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	45,000
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
<b>Total Program Income:</b>	<b>45,000</b>

#### Other CDBG Requirements

1. The amount of urgent need activities	294,514
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

The overall benefit to persons of low and moderate income will be calculated based on a single program year, PY 2020.

## **Attachments**

## Citizen Participation Comments

### Citizen Participation Overview and Detailed Comments

#### 2020-24 Five-Year Consolidated Plan, 2020 Annual Action Plan & 2020 Substantial Amendments: Goshen, Indiana

Opportunities for feedback are provided throughout the CDBG program year, but during the planning process for each consolidated and annual action plan a more formal effort is made to solicit input, following, at a minimum, the guidance provided by Goshen's Citizen Participation Plan. A list of more than 100 contacts from local housing and service providers, neighborhood association leaders, City of Goshen elected officials, City staff, local institutions, and local media are notified of, and invited to, each public meeting, and are also provided notice of public hearings and notice of the availability of the draft consolidated and annual plan and the public comment period. Notice of the availability of the draft consolidated and annual plan is also provided to the local Continuum of Care (Indiana Region 2 Homeless Coalition), along with opportunity for input.

Input for the 2020-24 Five-Year Consolidated Plan & 2020 Annual Action Plan was obtained through the following:

- Community Relations Commission meeting, January 14, 2020
- Council on Aging board meeting, January 15, 2020
- Walnut Hill board meeting, January 16, 2020
- Warsaw Housing Authority board meeting, January 28, 2020
- Public hearing for current plan review and input for upcoming plans, January 30, 2020
- Goshen Interfaith board meeting, February 12, 2020
- Elkhart County Clubhouse board meeting, February 20, 2020
- Lacasa board meeting, February 25, 2020
- Meeting with Continuum of Care to discuss homeless needs, February 27, 2020
- Public comment period for draft 2020-2024 consolidated plan & 2020 annual action plan, April 2, 2020, through May 1, 2020
- Public hearing to review current plans and take input for draft 2020-2024 consolidated plan & 2020 annual action plan, April 21, 2020
- Public meeting to authorize 2020-2024 consolidated plan & 2020 annual action plan submittal, May 5, 2020

Comments from meetings were incorporated into the five-year and annual action plans, but a summary of comments follows:

Council on Aging (COA) board meeting, January 15, 2020:

What needs of the elderly are met by the strategic priorities of the COA?

- Transportation
- In-home care
- Life enrichment – activity center (free)
- Medicare counseling – help find insurance (free)
- Tax preparation (free)
- Serve all townships
- 35-40% of clients are in Goshen area
- Veterans a significant part of client group

What gaps exist in the delivery of supportive services and access to housing for the elderly?

- Too expensive for housing if have to leave home
- Affordability of at-home services
- Age restrictions of funding, people younger need services but aren't eligible

What actions, activities or policies could be used to address unmet needs, gaps in the delivery of supportive services, and access to housing for the elderly?

- Facility in middle of County – to be more noticeable

- Resource database for referrals – need info for Goshen services

What specific local supportive services and facilities for the elderly have unequal access?

- Only 15% of elderly can afford assisted living
- Housing/assisted living not available & unaffordable
- Can't afford in-home services – eligible if meet Medicaid or Medicare-like requirements
- Need more in-home services

Walnut Hill (WH) board meeting, January 16, 2020:

What needs of children are met by the strategic priorities of WH?

- State objective – learning
- Quality pre-K education
- Prepare to be successful in school
- Not just children, also parents
- Affordable average weekly rate b/c of grants, donations & scholarships

What gaps exist in access to early childhood education for children in Goshen?

- Affordability – want to grow scholarship program
- Infant care – huge wait list (Walnut Hill added infant care to address this need)
- Social-emotional learning, lack of skills to self-regulate
- Ability to participate in group & cooperation is biggest barrier to success in Kindergarten (not ability to recognize letters/numbers)

What actions, activities or policies could be used to address unmet needs and gaps in access to early childhood education for children in Goshen?

- Creating funding for scholarships
- Tracking student progress with data
- Quality, including teacher training
- Not just "daycare"

What specific local services and facilities have unequal access for children in Goshen?

- Without financial resources, cannot access quality child care/education
- Quality is costly
- Quality child care/education is needed for Kindergarten readiness

Goshen Interfaith board meeting, February 12, 2020:

What needs of the homeless are met by the strategic priorities and activities of Interfaith?

- Housing for single women & families
- Help through other organizations to transition back to housing
- Safety & shelter
- Whole person – discover place in world
- Look at factors other than homelessness
- Connect to resources for financial training, mental health, addictions
- Warming shelter past 2 winters
- Program driven – each person has individual plan

What current policies or actions facilitate access to housing in Goshen?

- GIHN first point of contact for homeless referrals/services (wasn't well known-has been published by City)
- Goshen Homeless Coalition
- Neighborhood revitalization
- Rental stock put back into use
- Faith community support
- Lacasa
- Housing Authority
- Not a single cause for homelessness – tailor services to each person

What current policies, actions or obstacles impede access to housing in Goshen?

- Cost of housing
- Limited number of housing options – other cities have more options
- Limited number of families that can stay together
- Lack of safe & affordable housing
- Strong housing market competes with voucher-based rents
- Rental management agencies denying all tenants with a housing voucher

What actions, activities or policies could be used to address unmet needs, gaps in the delivery of services, and access to housing for the homeless in Goshen?

- Need transitional housing for people in between limits for PSH & vouchers
- Some cities have adopted policy that landlords cannot deny rental b/c of voucher
- Work Release clients pay for all their services (housing, food, drug testing) so they can't save \$ while in Work Release and then don't have \$ for rental downpayment
- Landlord education – misperception identified in Re-entry Initiative
- Change broad application of R-1 zoning
- Case management – rental mgmt. agency accepted tenant recently b/c they were receiving case mgmt

Elkhart County Clubhouse board meeting, February 20, 2020:

What needs of people with mental illness are met by the strategic priorities of Elkhart County Clubhouse?

- Acceptance & community
- Increasing social interaction (combating social isolation)
- Building productive members of society
- Destigmatizing mental illness
- Restoring self-confidence
- Help with housing & employment
- Returning to self-fulfilling & productive life

What gaps or impediments exist in the delivery of supportive services and access to housing for people with mental illness?

- Gap for housing is that PSH requires occupants to meet HUD definition of homelessness, which is too narrow
- Clubhouse members require help navigating procedures to get housing
- Lack of payee services (someone to administer \$ for individuals on Social Security)
- People on the edge of independence, not disabled but landlord requirements are difficult, hard to find coaching, usual trajectory is effort at independence and then eviction
- Not enough supportive housing (need twice what is currently available)
- Trolley is limited in route (can't get to Oaklawn in Goshen on Trolley)

What actions, activities or policies could be used to address unmet needs, gaps in the delivery of supportive services, and access to housing for people with mental illness?

- Medicaid & Medicare don't pay for staff to support group housing occupants
- Real Services, home assistance is understaffed
- PSH were game changers met needs of 30 people and have 30 more who need the same
- Need 3 more PSH facilities
- Landlords have been willing to house ex-offenders
- Very difficult to find housing for individuals on sex offender list, restrictions range from very restricted to not very restricted, and many aren't very restricted. For those most restricted, 85% of Goshen isn't available.

Lacasa board meeting, February 25, 2020:

What needs are met by the strategic priorities and activities of Lacasa?

- Asset building for families
- Neighborhood vitality/stabilization
- Personal empowerment
- Family stability
- Financial education (understanding \$, credit), leading to saving for particular goals (IDA) and enabling buying a home

What current policies or actions facilitate access to housing in Goshen?

- IDA matched savings program
- Lacasa rehabbing of properties into affordable housing, and not just to minimum standards, but state of the art, exceptionally well done
- Homeownership training
- City rental registration/inspection for baseline decent housing

What actions, activities or policies could be used to address unmet needs and expand access to housing in Goshen?

- Housing supply problem, across the board
- No houses for first time homebuyers, move-in ready in price range
- Affordable quality rental properties are in short supply
- One landlord with many substandard properties is a huge issue
- Housing stock on the north side of the City is inadequate, not good quality, limited, small, single bathrooms
- Housing in surrounding communities is more affordable, so employees move away from Goshen to save money
- Blight elimination is important
- Prices have gone up; decent houses sell quickly
- Houses with long-term owner occupants in low income areas tend to have deferred maintenance issues

A public hearing with 13 participants, representing seven local agencies and one City department, was held on January 30, 2020, to review the current five-year and program year 2020 plans, and to discuss needs, priorities and activities for the 2020-2024 consolidated plan and 2020 annual plan. A second public hearing was held April 21, 2020, as part of a regular Goshen Common Council meeting, to provide opportunity for input for the draft 2020-2024 consolidated plan and 2020 annual plan, and to review program year 2019. The draft 2020-2024 consolidated plan and 2020 annual plan were distributed to the Continuum of Care and to the broad CDBG contact list.

The local Continuum of Care, the Indiana Region 2 Homeless Coalition (IR2HC), was consulted through a group email and a meeting held February 27, 2020. The IR2HC is a group of public and private agencies who meet bi-monthly to coordinate and discuss services to address and prevent homelessness in Elkhart County and Region 2. A copy of the draft plan and notice of the public comment period and upcoming public hearing was provided to the Coalition via email on March 24, 2020.

Notice of public hearing and notice of availability of the 2020-2024 consolidated plan and 2020 annual plan was published in the Goshen News on April 1, 2020, with the plans available for review on April 2, 2020, at the Goshen Planning office and online at <https://goshenindiana.org/cdbg>. Notice of the public hearing and availability of the 2020-2024 consolidated plan and 2020 annual plan was also provided to the email contact list, consisting of more than 100 individuals and organizations, on March 24, 2020. A copy of the draft 2020-2024 consolidated plan and 2020 annual plan was emailed to the Region 2 Continuum of Care, on March 24, 2020. During the public comment period no comments were received.

A public hearing was held April 21, 2020, as part of a regular Goshen Common Council meeting, to provide opportunity for input for the draft 2020-2024 consolidated plan and 2020 annual plan, and to review program year 2019. Prior to the public hearing, the link to the draft plans, along with a notice of public hearing and notice of availability of the draft plans was provided to the regular Council distribution list, along with a summary of the proposed CDBG priorities, budget, and an overview of the current program year 2019. Attending the April 21, 2020, Council meeting were Mayor Stutsman, seven Council members, Council youth advisor, three City of Goshen department heads and staff, along with several members of the local media and approximately five community members. At the Council meeting, the CDBG administrator gave a brief overview of the 2020-2024 consolidated plan priorities. During the public hearing there were no Council or audience comments.

A final public meeting was held May 5, 2020, at a regular Goshen Common Council meeting, to authorize submittal of the 2020-2024 consolidated plan and 2020 annual plan, with Mayor Stutsman, seven Council

members, Council youth advisor, five City department heads and staff, and approximately seven community members attending. There were no questions from the Council, City staff or community members.

After receiving an allocation of CARES Act funding (CDBG-CV), a needs assessment was initiated in June 2020 with eight local public service and partner agencies to determine unfunded needs related to the coronavirus. The responses to that assessment were used in the development of the substantial amendment and funding plan. A completed draft of the substantial amendment was provided via email to the CDBG and Continuum of Care contact lists including notification of the 5-day comment period from September 17 through September 21, 2020. Notice of availability and public comment period for the substantial amendment was published in the Goshen News on September 16, 2020, with the plans available for review on September 17, 2020, at the Goshen Planning office and online at <https://goshenindiana.org/cdbg>. During the comment period, one comment was received expressing appreciation for the information provided.

An additional allocation of CARES Act funding (CDBG-CV3) was made available in September. A community analysis was conducted to determine the current emergency assistance resources available for renters residing within the City of Goshen. Upon completion of that analysis, it was determined that the need for rent and utility emergency assistance for households affected by COVID-19 is greater than the current resources available for such use. In order to strategically allocate and direct these funds to maximize the benefit for low/moderate income individuals and families, it was decided to implement and directly administer the Short-Term Rent and Utility Assistance Program. A completed draft of another substantial amendment was provided via email to the CDBG and Continuum of Care contact lists including notification of the 5-day comment period from October 22 through October 26, 2020. Notice of availability and public comment period for the substantial amendment was published in the Goshen News on October 21, 2020, with the plan available for review on October 22, 2020, at the Goshen Planning office and online at <https://goshenindiana.org/cdbg>. During the comment period, one comment was received positively affirming and expressing appreciation for the information provided. Additional comments and questions from one source are summarized as followed:

Comments- This amount of money is not going to “scratch the surface” of the existing need as with respect to the amount of work involved in creating and implementing a new program. Indiana Housing & Community Development Authority’s rent assistance program administered by [www.Indianahousingnow.org](http://www.Indianahousingnow.org) is now open and available to renters.

Question- Would it be more beneficial to expand an existing program than create a new one?

Answer- *Currently, there is not an organization in the City of Goshen that has the capacity to administer a rent and utility assistance program in accordance to CDBG guidelines. While there are other agencies administering rent and utility assistance, it is in addition to their primary mission and eligibility criteria for their assistance is much more lenient than CDBG criteria.*

Question- The City of Goshen had an agreement with a local agency to administer an assistance program for water and sewer customers facing disconnect. Could CDBG funds be added to that program to simply expand it?

Answer- *The Water & Sewer Utility assistance program is no longer being administered. The funds allocated for this assistance program has met the need in the community. Furthermore, the agency that was administering this program is no longer administering any type of emergency assistance funds. Eligibility for that program was also not in accordance with CDBG guidelines.*

Question- By only helping renters, this proposed program is only helping less than half of Goshen’s population. Homeowners may be impacted also. Why is this program only aimed to renters?

Answer- *In conducting the community assessment, it appears those that are currently seeking assistance are renters, not homeowners. With limited funds, it was decided to focus these funds for renters as that is where the*



*need appears to exist. Additionally, Indiana Foreclosure Prevention Network has the experience, capacity and funds to address solely the needs of homeowners needing mortgage assistance.*

On November 8, 2020, the City of Goshen was notified of a corrected entitlement allocation by the Department of Housing and Urban Development. The CDBG budget for the 2020 Annual Action Plan, within the 2020-2024 Consolidated Plan, required revision to reflect a corrected entitlement allocation, a decrease of \$41 which is a change of less than 1% of the existing budget. According to the City's Citizen Participation Plan, budgetary changes less than or equal to 30% of the CDBG budget are considered minor amendments. Notification of the budget change and minor amendment was provided via email to the CDBG and Continuum of Care contact lists including notification of the 15-day comment period from December 17 through December 31, 2020. Notice of availability and public comment period for the minor amendment was published in the Goshen News on December 16, 2020, with the plan available for review on December 17, 2020, at the Goshen Planning office and online at <https://goshenindiana.org/cdbg>. During the comment period, no comments were received.

Input for the substantial amendment to the 2020-2024 Consolidated Plan was obtained through the following:

- Invitation to CDBG contact list and Continuum of Care requesting input on substantial amendment to the 2022 Annual Action Plan and submittal timeline, October 5, 2022;
- Public comment period for substantial amendment to the 2022 Annual Action Plan, October 6, 2022, through November 4, 2022;
- Public hearing for substantial amendment to the 2022 Annual Action Plan, October 24, 2022.

In accordance with Goshen's CDBG Citizen Participation Plan, a 30-day public comment period was held October 6, 2022, through November 4, 2022, for a substantial amendment to the 2022 Annual Action Plan to add homeownership assistance as a new project/activity. The broad CDBG contact list and Continuum of Care were notified via email of the proposed substantial amendment, public comment period and public hearing, and were invited to comment. A public hearing was held October 24, 2022, as part of a regular Goshen Common Council meeting, to provide opportunity for input for the substantial amendment. . During the 30-day public comment period, no comments were received.

## Grantee Unique Appendices

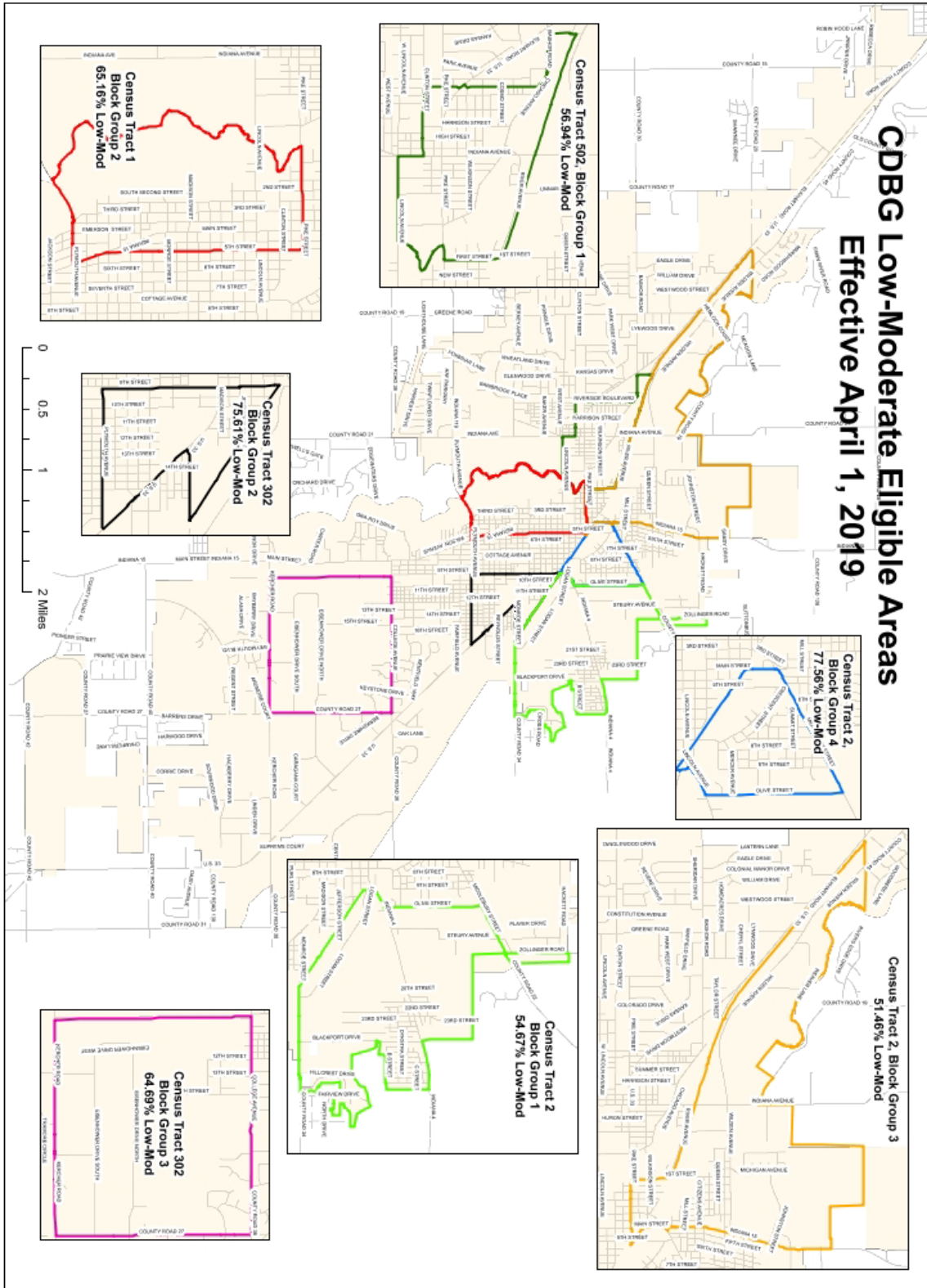
### GRANTEE APPENDICES

City of Goshen

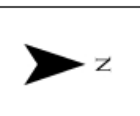
1. Map of Income-Eligible Census Block Groups
2. Proof of Publication- April 1, 2020 for Consolidated Plan
3. Proof of Publication- September 16, 2020 for Substantial Amendment
4. Proof of Publication- October 21, 2020 for Substantial Amendment reflecting additional CARES Act allocation
5. Proof of Publication- December 16, 2020 for Minor Amendment reflecting corrected entitlement allocation and change to budget
6. Proof of Publication- October 5, 2022 for Substantial Amendment initiation of a new activity for Homeownership Assistance
7. Citizen Participation Plan- Revised September 10, 2020
8. AP-35 Describe the reasons for Allocation priorities and any obstacles to addressing underserved needs

# CDBG Low-Moderate Eligible Areas

## Effective April 1, 2019



The City of Goshen's Digital Data is the property of the City of Goshen and Elkhart County, Indiana. All graphic data supplied by the city and county has been derived from public records that are constantly undergoing change and is not warranted for content or accuracy. The city and county do not guarantee the positional or thematic accuracy of the data. The cartographic digital files are not a legal representation of any of the features depicted, and the city and county disclaim any assumption of the legal status they represent. Any implied warranties, including warranties of merchantability or fitness for a particular purpose, shall be expressly excluded. The data represents an actual reproduction of data contained in the city's or county's computer files. This data may be incomplete or inaccurate, and is subject to modifications and changes. City of Goshen and Elkhart County cannot be held liable for errors or omissions in the data. The recipient's use and reliance upon such data is at the recipient's risk. By using this data, the recipient agrees to protect, hold harmless and indemnify the City of Goshen and Elkhart County and its employees and officers. This indemnity covers reasonable attorney fees and all court costs associated with the defense of the city and county arising out of this disclaimer.



# Proof of Publication

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Act # 163296Z

STATE OF INDIANA

Notice of Public Hearing and Notice of Availability of 2020-2024 Five-Year Consolidated Plan & Annual Action Plan for Program Year 2020  
City of Goshen  
Community Development Block Grant (CDBG)

The City of Goshen's CDBG 2020-2024 Five-Year Consolidated Plan and Annual Action Plan for Program Year 2020 have been completed and are available for public review and comment beginning April 2, 2020. The plans are available on the City website at [www.goshen.in.gov/cDBG](http://www.goshen.in.gov/cDBG).

The following priorities were among those identified for community and neighborhood development in the City of Goshen for the 2020-2024 CDBG Consolidated Plan:

- 1) Housing Opportunities
  - Improve owner-occupied housing through rental
  - Increase quality of rental housing
  - Increase funds for housing options
  - Reduce housing cost burden through higher wage job opportunities and job training
  - Provide permanent supportive housing for chronically homeless
  - Support affordable housing creation and preservation
  - Provide emergency shelter for homeless individuals and families
  - Expand housing options and access
  - Maintain and facilitate use of Housing Choice voucher program
- 2) Access to Services
  - Increase access to affordable healthcare
  - Increase services for mentally ill
  - Support programs for youth
  - Increase access to affordable childcare and early childhood education
  - Support services for elderly and the disabled
  - Support public transportation
  - Provide emergency shelter for homeless individuals and families
  - Provide permanent supportive housing for chronically homeless
  - Support community health centers for underserved populations
  - Increase access to substance abuse prevention and treatment
  - Support life skills development
  - Support nutrition programs and food assistance
- 3) Neighborhood Revitalization
  - Improve owner-occupied housing through rental
  - Reduce blighted residential properties
  - Address issues of unsafe or substandard housing
  - Increase quality of rental housing
  - Support public infrastructure projects
  - Repair/relocate existing sidewalks
  - Support neighborhood parks

**Proposed 2020 Action Plan**  
For program year 2020 the City of Goshen expects to receive an allocation of \$272,954 in CDBG funds, and will use the estimated \$5,500 of Program Income, and \$279,456 of prior year resources, for an estimated total budget of \$557,910.

The proposed use of CDBG funds for program year 2020 is as follows:

Public Service Grants - Provision of services to low and moderate income households and persons City-wide	\$40,000
Owner-occupied Rehabilitation of homes owned by low and moderate income households through loans, grants and delayed payment loans City-wide	\$178,029
Multi-family Housing Rehabilitation - Two projects to create and improve affordable housing	\$149,000
Planning, general administration, environmental reviews, and audit	\$30,981
<b>Total</b>	<b>\$597,910</b>

Comments may be submitted to Rhonda Yoder, Goshen City Planning, 204 E. Johnson, Suite 1, Goshen, IN 46535, 574-537-3878, [rhondayoder@goshen.in.gov](mailto:rhondayoder@goshen.in.gov), on or before 30 days after April 2, 2020, and no later than May 1, 2020. A summary of comments and responses will be submitted to ID.

The City will hold a public hearing on the proposed 2020-2024 Five-Year Consolidated Plan & 2020 Annual Action Plan on Tuesday, April 21, 2020, at 7:00 PM during the City Council meeting in the City Council Chambers at the Goshen Police and Courts Building, 111 E. Johnson Street, Goshen, The Goshen Police and Courts Building is handicapped accessible. Any individual needing personal care or special assistance to participate in the hearing process should contact the City as soon as possible.

The public hearing will include a review of the proposed 2020-2024 Five-Year Consolidated Plan & 2020 Annual Action Plan, a review of the current 2019 program year, and opportunity for citizen comment.

Jeremy P. Shiltner, Mayor  
City of Goshen  
202 S. 5th Street  
Goshen, IN 46535  
Phone 574-533-8621  
TTY 574-534-3185

April 1, 2020

EWS is a daily  
in the City of  
annexed true copy  
re week as follows;

April 1, 2020

*me. Deab*  
s Dea:

April 1, 2020

*S. Kulkarni*  
Notary Public

April 1, 2020

Commission # NP0716334

The Gos  
114 S. Main St., Goshen, IN 46526  
ID # 52-2064009



# Proof of Publication

**COPY**

Ad# 1625357

STATE OF INDIANA

Notice of City of Goshen Substantial Amendment to the 2020-2024 Five-Year Consolidated Plan, Program Year 2020 Annual Action Plan and Citizen Participation Plan Community Development Block Grant (CDBG)

**Background:**  
 The City of Goshen's latest Consolidated Plan details the funding strategy for the Community Development Block Grant (CDBG) for the period between 2020 and 2024. The Annual Action Plan details each year within the five-year Consolidated Plan and outlines the implementation of annual funding, which is developed through significant public input, surveys, and planning.  
 The City's Citizen Participation Plan (CPP) describes the efforts that the City will take to ensure eligible residents participate in developing these plans. It also provides requirements for public process when a "substantial amendment" to the Annual Action Plan is proposed. The following changes constitute a substantial amendment and require public notice as described in the CPP:

- A budget change exceeding 20 percent of the total CDBG budget;
- Addition or new activities not included in the consolidated annual action plan;
- Changes in the use of CDBG funds from one eligible activity to another eligible activity not included in the consolidated annual action plan.

Due to the COVID-19 public health emergency, the United States Department of Housing and Urban Development (HUD) has issued guidance that waives the Citizen Participation Plan requirements for amendment requests provided that 1) no fewer than five days are provided for public comment and that 2) residents have the opportunity to comment in person. It is the guidance that permits amendment to the City's Citizen Participation Plan to reflect such participation requirements in times of urgent need.

Additionally, HUD has awarded supplemental funding through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) for programming in Program Year 2020 (July 1, 2020 - June 30, 2021) Annual Action Plan.

**Proposed Substantial Amendments:**  
 The City is proposing the following amendment to the 2020-2024 Consolidated Plan and 2020 Annual Action Plan in order to supplement activities that were not previously identified to expand supplemental funding established by the CARES Act, referred to as CDBG-CV funds. Funds will be dedicated in accordance with the mission and goals of CDBG, however, extra consideration will be given to spend special-use funds on activities implemented in times of urgent need.

The City is proposing the following amendment to the Program Year 2020 Annual Action Plan in order to allocate certain funds established by the CARES Act to the projects listed below within the fiscal year. The following activities will be in addition to FY 2020 activities already planned and approved.

For Program Year 2020, the City of Goshen expects to receive an allocation of \$160,517 in CDBG-CV funds to fund activities to prevent, prepare for, and respond to the coronavirus.

The proposed use of CDBG-CV funds for program year 2020 is as follows:

Public Service Grants: Provision of services to low- and moderate-income households and persons City-wide to prevent, prepare for and respond to the coronavirus	\$ 94,968
P. Planning, general administration, environmental reviews, and such	\$ 65,549
<b>Total</b>	<b>\$160,517</b>

The City of Goshen's Substantial Amendment to the 2020-2024 Five-Year Consolidated Plan, Annual Action Plan for Program Year 2020, and Citizen Participation Plan have been prepared and are available for public review and comment beginning September 17, 2020. The plans and notices of the City are on [www.goshenindiana.org/city](http://www.goshenindiana.org/city) and will be available for review at the Goshen City Planning Department, 204 E. Jefferson, Suite A, Goshen, during regular business hours.

Comments may be submitted to Moschen Byrns, Goshen City Planning, 204 E. Jefferson, Suite A, Goshen, IN 46526-574, 666-9676, [moschenbyrns@goshenindiana.org](mailto:moschenbyrns@goshenindiana.org) or, before 5:00 p.m. September 17, 2020, and no later than September 21, 2020. A summary of comments and responses will be submitted to HUD September 16, 2020.

NEWS is a daily  
 ad in the City of  
 an annexed true copy  
 five week as follows:  
 umber 16, 2020

*Reed*  
 City Clerk

Subscribed and sworn before me this day of **September 16, 2020**

*Angela S. Kulczar*  
 Angela S. Kulczar  
 Notary Public

My commission expires February 01, 2027  
 Commission # NF071934



\$84.37

The Goshen News  
 114 S. Main St., Goshen, IN 46526  
 ID # 82-2664000

# Proof of Publication

<b>COPY</b>
AJ 3 1572179

STATE OF INDIANA,  
Elkhart County, ) ss.

I, being duly sworn, on oath say that THE GOSHEN NEWS is a daily newspaper of general circulation, printed and published in the City of Goshen, in the County and State of aforesaid; that the annexed true copy was published in said newspaper one consecutive week as follows:

**Notice of City of Goshen Substantial Amendment to the 2020-2024 Five Year Consolidated Plan and Program Year 2020 Annual Action Plan**  
Community Development Block Grant (CDBG)

**Background:**  
The City of Goshen's federal Consolidated Plan details the funding strategy for the Continuously Developing Block Grant (CDBG) through the Department of Housing and Urban Development (HUD) for the period between 2020 and 2024. The Annual Action Plan details each year within the 5-year Consolidated Plan and outlines the implementation of annual actions which is delivered through significant public input, surveys, and planning.

HUD has made another allocation available to the City of Goshen through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) for programming in Program Year 2020 (July 1, 2020-June 30, 2021) Annual Action Plan.

**Proposed Substantial Amendment:**  
The City is proposing the following amendment to the 2020-2024 Consolidated Plan and 2020 Annual Action Plan to provide additional activities that were not previously identified in expenditure allocations of supplemental funding established by the CARES Act, referred to as CDBG-DV funds. Priorities and funds will be allocated in accordance with the mission and goals of CDBG, however, extra consideration will be given to eligible eligible use funds on activities deemed essential in times of urgent need.

The City is proposing the following amendment to the Program Year 2020 Annual Action Plan in order to allocate program funds established by the CARES Act to projects in 2020 within the fiscal year. The following activities will be added to PY 2020 activities already proposed and approved.

For Program Year 2020, the City of Goshen expects to receive another allocation of \$133,897 of CDBG-DV funds to fund activities in 2020. The funds are allocated to the coronavirus, reflecting a cumulative total of \$286,514 if these special use urgent need funds.

The proposed use of the CDBG-DV funds for program year 2020 is as follows:

Public Service Centers: Provision of services to low- and middle-income households and persons 60+ who are rent burdened and respond to the coronavirus.	\$154,268
Short-Term Rent and Utility Assistance Program: Application-based program for low- and moderate-income renters with the City or CDBG or that have experienced financial hardship as a result of the coronavirus.	\$133,897
Planning, general administration, environmental reviews, and audit	\$98,549
<b>Total:</b>	<b>\$386,714</b>

The City of Goshen's Substantial Amendment to the 2020-2024 Five Year Consolidated Plan and Annual Action Plan for Program Year 2020, was drafted prepared and was available for public review and comment beginning October 22, 2020. The plan is available on the City website at [www.goshenindiana.org/cdbg](http://www.goshenindiana.org/cdbg) and will be available for review at the Goshen City Meeting Room, 204 E. Jefferson, Suite 4, Goshen, during regular business hours.

Comments may be submitted to Maureen Bolser, Director of Planning, 204 E. Jefferson, Suite 4, Goshen, IN 46526-5744-531479, [maureenbolser@goshenindiana.org](mailto:maureenbolser@goshenindiana.org) on or before 5 days after October 22, 2020, and no later than October 25, 2020. A summary of comments and responses will be submitted to HUD.

October 21 - hspaxp

October 21, 2020

*Maureen Bolser*  
Maureen Bolser

October 21, 2020

*Angela S. Kulczar*  
Angela S. Kulczar  
Notary Public

574.90

My commission expires February 04, 2027  
Commission # NP0719334

The Goshen News  
114 S. Main St., Goshen, IN 46526  
Phone 82-2664009



# Proof of Publication

**COPY**

Ad # 183341

STATE OF INDIANA,  
 Washburn County

Public Notice  
 City of Goshen  
 Amendment to Community Development Block Grant (CDBG) 2019 & 2020 Annual Action Plans

A public notice to both the City of Goshen's CDBG Annual Action Plans Program Years 2019 and 2020 have been prepared and are available for public review and comment. The proposed amendments are available for review 10:15 days beginning December 1, 2020 and continuing through December 31, 2020. Copies are available for review at the City of Goshen, 114 S. Main St., Goshen, IN 46526. Budgetary changes less than or equal to 30% of the CDBG budget are considered minor amendments.

The CDBG Annual Action Plan for Program Year (PY) 2019 will be revised to update the PY 2019 budget to add an additional \$4,323 in prior year resources to increase the allocation for the single-unit housing program. This accounts for an approximate 1.3% change to the budget. The proposed amendments for the 2019 annual action plan exceeded the original budget allocation. This will increase the total CDBG budget for PY 2019 by the same amount. The updates are shown as follows:

PY 2019 Original Activity Allocation		PY 2019 Revised Activity Allocation	
Single Unit Housing Rental	\$115,023.00	Single Unit Housing Rental	\$119,346.00
Original Budget		Revised Budget	
Entitlement Grant	\$22,036.00	Entitlement Grant	\$22,036.00
Program Income	\$36,203.18	Program Income	\$36,203.18
Prior Year Resources	\$22,853.82	Prior Year Resources	\$27,136.82
Total	\$84,000.00	Total	\$85,376.00

The CDBG budget for the 2020 Annual Action Plan, with the 2020-2021 Consolidated Plan, will be revised to reflect the PY 2020 budget to which a decrease will be applied, a decrease of \$41 which is a change of less than 1% of the existing budget. On November 3, 2020, the City of Goshen was notified of the decreased entitlement allocation by the Department of Housing and Urban Development. The proposed amendments for the 2020 annual action plan will be decreased the same amount to reflect the decreased allocation. The updates are shown as follows:

PY 2020 Original Activity Allocation		PY 2020 Revised Activity Allocation	
Program Administration	\$53,000.00	Program Administration	\$52,959.00
Original Budget		Revised Budget	
Entitlement Grant	\$272,864.00	Entitlement Grant	\$272,823.00
Program Income	\$13,000.00	Program Income	\$13,000.00
Prior Year Resources	\$275,166.00	Prior Year Resources	\$275,166.00
Total	\$560,000.00	Total	\$560,000.00

Comments may be submitted to Meghan Banta, Goshen City Planning Manager, Jefferson Street, Goshen, IN 46526, 531-531-8300, mcbanta@cityofgoshen.org, on or before 10:15 days after and including December 31, 2020 and no later than December 31, 2020. A summary of comments and responses will be submitted to HUD.

Public Notice  
 City of Goshen  
 Amendment to Community Development Block Grant (CDBG) 2019 & 2020 Annual Action Plans

THE GOSHEN NEWS is a daily newspaper published in the City of Goshen, Indiana. This is a true and correct copy of the annexed true copy of the original document. The publication schedule for this week is as follows:

December 16, 2020

*Mackenzie Deal*  
 Mackenzie Deal

Subscribed and sworn before me this day of **December 16, 2020**

*Angela S. Kulczar*  
 Angela S. Kulczar Notary Public

\$64.41

My commission expires February 01, 2027  
 Commission # NPO718334



The Goshen News  
 114 S. Main St., Goshen, IN 46526  
 ID # 82-298-1009

# Proof of Publication

**COPY**

Ad # 1794626

STATE OF INDIANA,  
Elkhart County, ) ss:

**Notice of Public Hearing and Notice of Public Comment Period**  
City of Goshen Community Development Block Grant (CDBG)  
Substantial Amendments to 2020-2024 Five Year Consolidated Plan & 2022 Annual Action Plan

A proposed Amendment to the City of Goshen CDBG 2020-2024 Five Year Consolidated Plan and 2022 Annual Action Plan has been prepared and is available for public review and comment for a period of 30 days beginning October 5, 2022 and ending on Thursday, November 4, 2022. The amendment is available for review at Goshen City Planning, 204 E. Jefferson Street, Suite 4, Goshen, and on the City of Goshen website at <http://goshenindiana.org/cdbg>.

The City of Goshen is proposing to amend the 2020-2024 Five Year Consolidated Plan to include non-covered City Assistance activities to be used to finance by local funds, and to amend the 2022 Annual Action Plan to include Homeownership Assistance as a new activity. Homeownership assistance would be available for low-to-moderate income households in participating areas within the City of Goshen, and City financial assistance could relieve monthly payments and reduce or eliminate property taxes and market rates.

The amendment does not change the overall 2.0% CDBG budget, but would reduce the amount of funds allocated to eligible units from 5100 to 3500, and would allocate the reduction of 1600 to the City Homeownership Assistance activity.

Following the amendment, the use of CDBG funds for Program Year 2022 would be as follows:

1. Public Service Grants	\$45,000
2. Single Unit Housing Rehab.	\$50,000
3. Homeownership Assistance	\$41,326
4. HUD Utility Assistance	\$180,000
5. Training & Job Placement	\$30,000
<b>TOTAL</b>	<b>\$347,326</b>

The City of Goshen will have a public hearing on the proposed Substantial Amendment on Monday, October 24, 2022, at 6:00 PM during the regular Goshen Common Council meeting in the Council Chambers at the Courthouse and Court Building, 111 E. Jefferson Street, Goshen. The Courthouse and Court Building is handicap accessible. Any individual speaking persons and others needing special assistance to get a public hearing process should contact the City as soon as possible.

A public hearing will include a review of the proposed amendment and opportunity for public comment.

Comments should be directed to Theresa Carrington at Goshen City Planning, 204 E. Jefferson, Suite 4, Goshen, IN 46526; 574-533-6970; [therescarrington@goshenindiana.org](mailto:therescarrington@goshenindiana.org) or on social media by October 6, 2022, and no later than November 4, 2022. A summary of comments will be distributed to the Board.

Theresa Carrington, Mayor  
City of Goshen  
204 E. Jefferson Street  
Goshen, IN 46526  
Phone: 574-533-6970  
TTY: 574-684-3185

October 5, 2022

NEWS is a daily  
ed in the City of  
s annexed true copy  
ulative week as follows:  
  
October 5, 2022

*Kristine F. Erb*  
\_\_\_\_\_  
Kristine F. Erb

Subscribed and sworn before me this day of **October 5, 2022**

*Angela S. Kulczar*  
\_\_\_\_\_  
Angela S. Kulczar  
Notary Public

My commission expires February 04, 2027  
Commission # NP0718354



**\$77.47**

The Goshen News  
114 S. Main St., Goshen, IN 46526  
ID # 82-2684009



City of Goshen  
Citizen Participation Plan  
Community Development Block Grant Program  
Revised September 10, 2020

In accordance with guidelines established by the US Department of Housing & Urban Development (HUD) in 24 CFR 91.105 and 91.505, the City of Goshen is revising the Citizen Participation Plan for the Community Development Block Grant (CDBG) program.

The Citizen Participation Plan establishes procedures for obtaining the views of citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties regarding the use of CDBG funds. Other interested parties include, among others, broadband internet service providers, organizations engaged in narrowing the digital divide, agencies responsible for the management of flood prone areas, public land or water resources, and emergency management agencies.

Of particular importance are the views of persons of low and moderate income, who are intended to be the principal beneficiaries of the CDBG program, and residents of areas where activities are expected to take place. The participation of all City of Goshen residents will be encouraged, including minorities, non-English speaking persons, and persons with disabilities, and the City will take the appropriate actions to encourage this participation.

Citizen input is essential in the following areas of the CDBG process:

1. Identification of housing and community development needs;
2. Development of the Consolidated Plan;
3. Development of the Annual Action Plan;
4. Development of the Citizen Participation Plan;
5. Substantial amendments to the Consolidated Plan or the Annual Action Plan; and
6. Annual performance report.

Citizen participation will be accomplished through public meetings, public hearings, public comment periods, Internet postings, focus groups, and through contacts with City officials.

#### Documents Available for Public Review & Comment

When documents are available for public review and comment, notice of the availability of the document will be published in the Goshen News, posted on the City website, and emailed to a CDBG contact list that as possible includes citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties, including the Warsaw Housing Authority. The document will be available for review at the Goshen City Planning office and online on the City website. All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD.

#### Public Hearings

Public hearings will be held in order to address housing and community development needs, the development of proposed activities, and the review of program performance. Notice of the time, date and place of each public hearing will be published in the Goshen News at least seven days prior to the scheduled public hearing.

Notices announcing the public hearing will be posted on the City website and emailed to a CDBG contact list that as possible includes citizens, public and private agencies, local and regional institutions, the Continuum of Care,

businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties, including the Warsaw Housing Authority.

Public hearings will be scheduled at times and locations convenient to potential and actual beneficiaries, and with accommodation for persons with disabilities. The public hearing notice will state that non-English speaking persons and others needing special assistance to participate in the public hearing process should contact the City to make the necessary accommodations.

A minimum of two public hearings will be held each program year, during two different stages of the program year. One public hearing (program planning hearing) will be held during the development of the consolidated or annual plan and before the proposed consolidated or annual plan is published for comment in order to obtain the views of citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations and other interested parties on housing and community development needs, including priority non-housing community development needs and affirmatively furthering fair housing. In addition to addressing housing and community development needs, this public hearing will address the development of proposed activities and review of program performance. A second public hearing (plan or program review hearing) will be held either during the comment period for the consolidated or annual plan, or during the comment period for the annual performance report. Depending on its timing, this public hearing will address the development of proposed activities and/or review of program performance. All public hearings will seek to obtain the view of citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations and other interested parties, and will respond to proposals and questions.

#### Virtual Public Hearings

If a required public hearing occurs during a public health or other emergency, when public gatherings are limited by the emergency, a virtual public hearing may be held in place of an in-person public hearing using an online platform that facilitates public access. Notice of the public hearing will follow the procedures outlined in the preceding section.

#### Program Planning Hearing

The public hearing addressing housing and community development needs will also address the development of proposed activities and will include a review of program performance. The following points will be included:

1. Total amount of CDBG funds expected to be available for community development and housing activities.
2. Activities that may be undertaken with these funds and the estimated amount that will benefit persons of low and moderate income.
3. Discussion of CDBG program requirements.
4. Processes to be followed in applying for CDBG funds.
5. Comments, suggestions and input for the development of the consolidated or annual plan, particularly from persons of low and moderate income and neighborhood residents living in areas where CDBG funds are proposed to be used.

#### Plan or Program Review Hearing

The plan or program review hearing will include the following:

1. Review of CDBG program requirements.
2. Review of citizen proposals and comments from the program planning public hearing.
3. Proposed community development and housing objectives and activities or review of previous program year CDBG objectives and activities.
4. Proposed use of CDBG funds or review of previous program year use of CDBG funds.
5. Comments, suggestions and input in response to the proposed plan or in response to the performance report.

#### Assessment of Performance

At all public hearings, citizens and citizen organizations will be given the opportunity to assess and comment on all aspects of the City's CDBG performance. This assessment will include a determination as to whether objectives have been achieved. All comments or views of citizens received in writing or orally at public hearings will be considered during the preparation of the annual performance report. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the final performance report submitted to HUD.

The annual performance report to HUD will include the following:

1. Status, including objectives and goals, of each CDBG activity.
2. Financial report for each CDBG activity.

Notice of the availability of the annual performance report will be published in the *Goshen News*, posted on the City website, and emailed to a CDBG contact list that as possible includes citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties, including the Warsaw Housing Authority. The document will be available for review at the Goshen City Planning office and online on the City website. The annual performance report will be available for public comment for a minimum of 15 days following the published notice.

#### Adoption of a Consolidated or Annual Plan

Notice of the availability of the consolidated or annual plan will be published in the *Goshen News*, posted on the City website, and emailed to a CDBG contact list that as possible includes citizens, public and private agencies, local and regional institutions, the Continuum of Care, businesses, developers, nonprofit and philanthropic organizations, community-based and faith-based organizations, and other interested parties, including the Warsaw Housing Authority. The document will be available for review at the Goshen City Planning office and online on the City website. The consolidated or annual plan will be available for public comment for a minimum of 30 days following the published notice. All comments or views of citizens received in writing or orally at public hearings and during the public comment period will be considered in the preparation of the consolidated or annual plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final consolidated or annual plan.

#### Objections to the City of Goshen's CDBG Application

Persons or groups wishing to object to approval of the City's CDBG application to the US Department of Housing & Urban Development (HUD) may do so by contacting:

Department of Housing & Urban Development  
Community Planning & Development  
575 N Pennsylvania Street, Suite 655  
Indianapolis, IN 46204

HUD will consider objections only on the following grounds:

1. The applicant's description of needs and objectives is plainly inconsistent with available facts and data; or
2. The activities to be undertaken are plainly inappropriate to meeting the needs and objectives identified by the applicant; or
3. The application does not comply with the program requirements or other applicable law; or
4. The application proposes activities which are ineligible.

#### Displacement and Relocation

According to the City's Residential Antidisplacement and Relocation Assistance Plan adopted April 23, 1990, it is the City's policy to undertake activities which will not require involuntary displacement or relocation, to the

maximum extent feasible. Should displacement or relocation result from CDBG activities, the guidelines found in 24 CFR 570.606 will be followed.

#### Complaints & Grievances

Complaints and grievances must be filed in writing with the CDBG Administrator, 204 E. Jefferson Street, Suite 4, Goshen, IN 46528. Written answers to properly filed complaints and grievances will be provided within 15 working days, where practicable.

#### Availability of Information

The City of Goshen will make available, upon written request for a specific record, copies of program records and information concerning the CDBG program, to any Goshen resident or organization, to the extent that such requests are consistent with consideration of personal privacy and obligations of confidentiality. Written requests should be submitted during normal working hours to the following office:

CDBG Administrator  
Goshen City Planning Office  
204 E Jefferson Street, Suite 4  
Goshen, IN 46528

#### Technical Assistance

The City will provide technical assistance to groups representative of persons of low and moderate income that request such assistance in developing proposals, subject to a limitation determined by the City with respect to the resources available to the City and the overall objectives of the CDBG program.

Requests for technical assistance should be made to:

CDBG Administrator  
Goshen City Planning Office  
204 E Jefferson Street, Suite 4  
Goshen, IN 46528  
574-537-3815

#### Amendments to the CDBG Consolidated or Annual Plan

The Housing and Community Development Act of 1974 provides that amendments to the consolidated or annual plan may be made during any program year. Such amendments may include the reallocation of CDBG funds, the allocation of additional CDBG funds, the designation of new activities, changes in the use of CDBG funds from one eligible activity to another, and the designation of new locations for activities.

According to this Citizen Participation Plan, a substantial amendment is a budget change exceeding 30 percent of the total CDBG budget, initiation of new activities not included in the consolidated or annual plan, or changes in the use of CDBG funds from one eligible activity to another eligible activity not included in the consolidated or annual plan. A minor amendment is a budget change less than or equal to 30 percent of the total CDBG budget, or a change in the location of activities already included in the consolidated or annual plan. Within an annual plan, changes in the use of CDBG funds from one eligible activity to another eligible activity already included in the annual plan is not an amendment, provided allocation priorities are not modified.

Prior to the implementation of a minor amendment to the consolidated or annual plan, the public will be advised by published notice, as outlined previously, and given a minimum of 15 days to comment.

Prior to the implementation of a substantial amendment, a public hearing will be conducted, notice of the amendment will be published as outlined in the Public Hearings section above, and the public will be given a minimum of 30 days to provide comments.

All comments and views will be considered, and a summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be included in the final document submitted to HUD.

Amendment Procedures for Meeting Urgent Needs

When amendments are required to the consolidated plan, annual plan, and/or Citizen Participation Plan to carry out activities to meet the urgent need national objective at 24 CFR 570.208(c), expedited citizen participation procedures will be allowed, including published notice to citizens with a public comment period of no less than five calendar days following the published notice, concurrent for all plans being amended. The five-day public comment period is considered reasonable notice and opportunity to comment for urgent need amendments, and these amendments, even if defined as substantial, will require no public hearing.

**AP-35**

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

Approximately 62% of the CDBG budget will be used for multi-unit housing rehab, including energy efficiency improvements, to be undertaken by a CBDO. The objective is to create and preserve decent rental housing for low/moderate income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable neighborhoods. The goal is to rehab four units each program year. CDBG funds will be a secondary funding source, used with HOME and/or LIHTC. Rents will follow the rents required by the primary funding source, typically HOME and/or LIHTC, as set by IHEDA. CDBG will require a concurrent five-year affordability period for all multi-family rehab projects.

Approximately 20% of the CDBG budget will be used for owner-occupied housing rehab, with the objective of supporting the retention of decent, safe housing, with the outcome of affordable rehab services.

Approximately 8% of the overall CDBG budget (funded at the 15% cap) will be used for public service grants, with the objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals, with the outcomes of available and affordable access to housing, primary healthcare, mental health services, early childhood education, senior transportation, and daily nutrition programs.

Finally, approximately 10% of the CDBG budget will be spent for program planning & administration, which will facilitate the implementation of all other activities. Program planning funds will support neighborhood outreach in income eligible neighborhoods. General administration funds will be spent in support of the overall CDBG program.

The City of Goshen will implement the CDBG priorities using a neighborhood-based strategy, with the primary objective of creating a suitable living environment, with the outcome of a more sustainable and livable neighborhood. The CDBG focus areas are based on income eligible Census block groups, which are typically older areas where investment is needed in housing and infrastructure. Outreach efforts will strengthen neighborhood associations and help support implementation of CDBG activities, such as identifying homeowners in need of housing rehabilitation assistance.

The neighborhood-based strategy has been used successfully in several previous neighborhoods, and, based on this positive experience, the City plans to continue this strategy of concentrating housing rehabilitation, public facilities improvements, community development activities, and support for neighborhood associations within a specific neighborhood in order to maximize the impact of limited funds.

Within the areas eligible for CDBG funding, obstacles to meeting underserved needs include an

inadequate amount of CDBG funding, lack of participation by landlords who own property in the area, and lack of awareness and lack of participation by neighborhood residents. These obstacles to meeting underserved needs will be addressed primarily through the cooperative implementation of the CDBG plan, with the City, local public service organizations, Lacasa, Habitat for Humanity, and the families and individuals in neighborhoods working together. Part of the strength of the Goshen CDBG program is a result of the positive working relationships that exist between the City and local partners, including other public agencies, non-profit agencies, and neighborhood residents. Lacasa's neighborhood outreach worker and the City's neighborhood association coordinator will continue to work together to develop and strengthen neighborhood associations. When neighborhood associations are active, residents work together to improve their neighborhood and implementation of the CDBG program is more effective.

The CDBG-CV budget is broken down into two allocation categories- public services and program administration. Approximately, 96.8% of the CDBG-CV budget is allocated to public service activities to prevent, prepare for and respond to the coronavirus as program flexibilities grant no cap on such activities for CDBG-CV. Within this effort, two objectives will be addressed. For the first allocation of CARES Act funds, the objective to promote a suitable living environment in the midst of a public health crisis for low/moderate income individuals and families will be addressed. The intended outcomes of this objective are to increase availability/accessibility and improve affordability of services, including primary healthcare, mental health supportive services, early childhood education, senior services and daily nutrition programs. The next allocation of CARES Act funds will address the need of furthering housing opportunities for low/moderate income individuals and families, specifically targeting the objective of creating a suitable living environment by expanding housing assistance for this population. The intended outcomes of this activity are to make housing more affordable for renters financially affected by the coronavirus, prevent homelessness and/or utility disconnect. The remaining portion of the budget (3.2%) will be allocated toward program administration costs to support overall the overall CDBG-CV program and its implementation.

The allocation priorities were determined by an initial needs assessment conducted with our existing subrecipients of public service grants and partner agencies for the first allocation and community analysis conducted upon notification of the additional allocation. For the first allocation, the City determined the most effective and efficient use of these funds were to support agencies in our community in their efforts to prevent, prepare for and respond to the coronavirus. Given the need for emergency assistance far exceeded the resources available, it was determined the most appropriate use for the next allocation likely to yield the greatest number of and have highest impact on beneficiaries was the implementation and direct administration of the Short-Term Rent and Utility Assistance Program. The public health crisis has significantly impacted our community, and the increase of services and emergency assistance targeted to low/moderate individuals and families necessary to respond this crisis is/has been substantial.

With consideration of each allocation, the obstacles to meeting underserved present primarily in the eligibility criteria required for CDBG assistance. While stringent criteria are necessary to ensure the

target beneficiary population is being served, there is little to no room for flexibility with regard to granting assistance in a public health crisis. The positive, close partnerships with outside organizations will be key to carry out effective, efficient and strategic plans for CARES Act funds.




Grantee SF-424's and Certification(s)

OMB Number: 4040-0004  
 Expiration Date: 12/31/2019

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: B-20-MO-19-C015	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: Goshen, Indiana		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 35-6001045	* c. Organizational OLMS: 0966461360800	
d. Address:		
* Street: Street1: 202 South 5th Street Street2: <input type="text"/>	* City: Goshen	
County/Parish: <input type="text"/>	* State: IN: Indiana	
* Province: <input type="text"/>	* Country: USA, UNITED STATES	
* Zip / Postal Code: 46526-8703		
e. Organizational Unit:		
Department Name: Community Development	Division Name: Planning	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: Mr.	* First Name: Deaghen	
Middle Name: ing		
* Last Name: By Lane		
Suffix: <input type="text"/>		
Title: Community Development Specialist		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: 574-533-5370	* Fax Number: 574-533-6526	
* Email: deaghenbylane@goshencommunity.com		

Application for Federal Assistance SF-424	
<b>* 8. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City or Township Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="Department of Housing &amp; Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.210"/> <b>CFDA Title:</b> <input type="text" value="Community Development Block Grants/Entitlement Grants"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text" value="2015-2016"/> <b>Title:</b> <input type="text"/>	
<b>13. Competition Identification Number:</b> <input type="text"/> <b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="New Attachment"/>	
<b>* 16. Descriptive Title of Applicant's Project:</b> <input type="text" value="Community Development Block Grant"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="New Attachments"/>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: <input type="text" value="14-002"/>	* b. Program/Project: <input type="text" value=""/>
Attach an additional list of Program/Project Congressional Districts if needed:	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/>	
17. Proposed Project:	
* a. Start Date: <input type="text" value="07/01/2020"/>	* b. End Date: <input type="text" value="06/30/2021"/>
18. Estimated Funding (\$):	
* a. Federal:	<input type="text" value="272,823.00"/>
* b. Applicant:	<input type="text" value="0.00"/>
* c. State:	<input type="text" value=""/>
* d. Local:	<input type="text" value=""/>
* e. Other:	<input type="text" value="275,265.00"/>
* f. Program Income:	<input type="text" value="45,000.00"/>
* g. TOTAL:	<input type="text" value="593,088.00"/>
19. Is Application Subject to Review By State Under Executive Order 12372 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on <input type="text" value=""/>	
<input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach:	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Conroy"/>
Middle Name: <input type="text" value=""/>	
* Last Name: <input type="text" value="Mushinski"/>	
Suffix: <input type="text" value=""/>	
* Title: <input type="text" value="Mayor"/>	
* Telephone Number: <input type="text" value="514-500-8322"/>	Fax Number: <input type="text" value="514-538-0740"/>
* Email: <input type="text" value="conroy@gooshen.org"/>	
* Signature of Authorized Representative: 	* Date Signed: <input type="text" value="1/4/2021"/>

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4140-0039  
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4703) relating to prescribed standards of merit systems for programs funded under one of the 18 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 86-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686) which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-265), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91 616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§280 d1-3 and 280 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VII of the Civil Rights Act of 1964 (42 U.S.C. §§2001 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

Previous Edition usable:

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Standard Form 424D (Rev. 7-67)  
Prescribed by GMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-648) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1608 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) initiation of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-160) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11898; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (18 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) Implementation Plans under Section 176(c) of the Clean Air Act of 1965, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523), and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1986, as amended (16 U.S.C. §470), EO 11593 (Identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§489a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1986 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Prosecuting a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Goshen, Indiana	5/6/20

SF-424D (Rev. 7-97) Back

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential anti-displacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

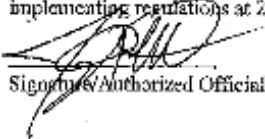
**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
Signature/Authorized Official

5/6/20  
Date

### Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2020, \_\_\_\_\_ (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its


jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** – The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** – Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

**Compliance with Laws** – It will comply with applicable laws.

  
\_\_\_\_\_  
Signature/Authorized Official

5/6/20  
\_\_\_\_\_  
Date


Mayor  
\_\_\_\_\_  
Title



**OPTIONAL CERTIFICATION  
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(e):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
\_\_\_\_\_  
Signature/Authorized Official

5/4/20  
\_\_\_\_\_  
Date

Mayor  
\_\_\_\_\_  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING:**

**A. Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application		* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision * If Revision, select appropriate title(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>		4. Applicant Identifier: <input type="text"/>
5a. Federal Entity Identifier: <input type="text"/>		5b. Federal Award Identifier: <input type="text" value="B-20-00-18-0015"/>
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>		7. State Application Identifier: <input type="text"/>
<b>B. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="Goshen, Indiana"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="75-6001019"/>		* c. Organizational DUNS: <input type="text" value="0365451309000"/>
<b>d. Address:</b>		
* Street 1:	<input type="text" value="200 South 6th Street"/>	
* Street 2:	<input type="text"/>	
* City:	<input type="text" value="Goshen"/>	
* County/Parish:	<input type="text"/>	
* State:	<input type="text" value="IN: Indiana"/>	
* Province:	<input type="text"/>	
* Country:	<input type="text" value="USA: UNITED STATES"/>	
* Zip / Postal Code:	<input type="text" value="45828-3733"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Community Development"/>		Division Name: <input type="text" value="Planning"/>
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix:	<input type="text" value="Mrs."/>	* First Name: <input type="text" value="Reagan"/>
Middle Name:	<input type="text" value="IZ"/>	
* Last Name:	<input type="text" value="Bylone"/>	
Suffix:	<input type="text"/>	
Title:	<input type="text" value="Community Development Specialist"/>	
Organizational Affiliation: <input type="text"/>		
* Telephone Number:	<input type="text" value="574-535-9370"/>	* Fax Number: <input type="text"/>
* Email:	<input type="text" value="reaganbylone@goshencommunity.com"/>	

Application for Federal Assistance SF-424	
<b>* 8. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City of Honolulu Government"/>	
<b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/>	
<b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/>	
<b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="Department of Housing &amp; Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.218"/> CFDA Title: <input type="text" value="Community Development Block Grant-DR/Rehilitation Grant"/>	
<b>* 12. Funding Opportunity Number:</b> <input type="text"/> <b>Title:</b> <input type="text"/>	
<b>13. Competition Identification Number:</b> <input type="text"/> <b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Community Development Block Grant-CV"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="File Attachment"/> <input type="button" value="Make Attachment"/> <input type="button" value="View Attachment"/>	

**Application for Federal Assistance SF-424**

**16. Congressional Districts Of:**  
 \*a. Applicant:  \*b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

**17. Proposed Project:**  
 \*a. Start Date:  \*b. End Date:

**18. Estimated Funding (\$):**

*a. Federal	<input type="text" value="294,514.00"/>
*b. Applicant	<input type="text"/>
*c. State	<input type="text"/>
*d. Local	<input type="text"/>
*e. Other	<input type="text"/>
*f. Program Income	<input type="text"/>
*g. TOTAL	<input type="text" value="294,514.00"/>


**\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**  
 a. This application was made available to the State under the Executive Order 12372 Process for review on   
 b. Program is subject to E.O. 12372 but has not been selected by the State for review.  
 c. Program is not covered by E.O. 12372.

**\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**  
 Yes  No  
 If "Yes", provide explanation and attach

**21. \*By signing this application, I certify (1) to the statements contained in the list of certifications\*\* and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances\*\* and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)**  
 \*\* I AGREE

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

**Authorized Representative:**

Prefix:  \*First Name:   
 Middle Name:   
 \*Last Name:   
 Suffix:   
 \*Title:   
 \*Telephone Number:  \*Fax Number:   
 \*Email:   
 \*Signature of Authorized Representative:  \*Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0008  
Expiration Date: 01/31/2019

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0543-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance, and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4729-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4901 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-382) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§525 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§2601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-87)  
Prescribed by OMB Circular A-102

- 11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
- 12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
- 14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
- 15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-150) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11732; (c) protection of wetlands pursuant to EO 11890; (d) evaluation of flood hazards in floodplains in accordance with EO 11888; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 173(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
- 16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
- 17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§468a-1 et seq.).
- 18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
- 19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
- 20. Will comply with the requirements of Section 108(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Goshen, Indiana	11-2-2020

8F-124D (Rev. 7-97) Back

## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

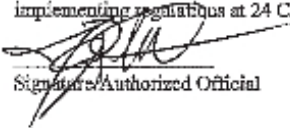
**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LII, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
Signature/Authorized Official

10/15/20  
Date



**Specific CDBG Certifications**

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate incomes. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2021, ..... (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

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The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K, and R;

**Compliance with Laws** -- It will comply with applicable laws.

  
\_\_\_\_\_  
Signature/Authorized Official

10/15/20  
\_\_\_\_\_  
Date

Mayor  
\_\_\_\_\_  
Title

**OPTIONAL CERTIFICATION  
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

  
\_\_\_\_\_  
Signature/Authorized Official

10/15/20  
\_\_\_\_\_  
Date

Mayor  
\_\_\_\_\_  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING:**

**A. Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1332, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

## Appendix - Alternate/Local Data Sources