

Executive Summary

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

1. Introduction

The U.S. Department of Housing and Urban Development (HUD) awards Community Development Block Grant (CDBG) funds to "Entitlement Communities" across the United States. Awards are based on formula calculations including factors such as the population of the community, pre-1940's housing stock, growth and decline. The City of Greenwood, located south of Indianapolis, Indiana, in Johnson County, is a new entitlement community. Figure 1 shows the location of Greenwood in relation to the Indianapolis Metropolitan Statistical Area.



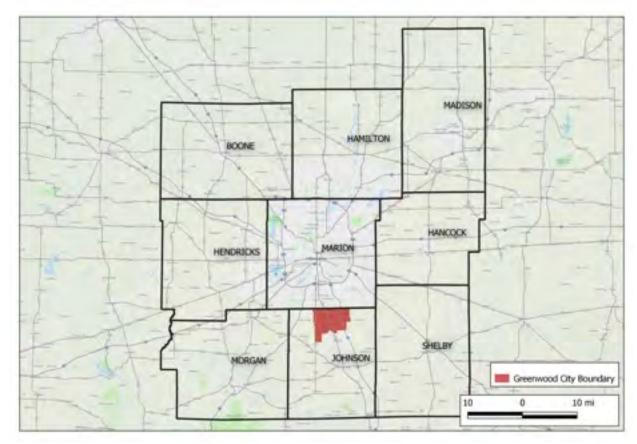


Figure 1 - Greenwood - Highlighted in Red - as Part of the Indianapolis MSA

In 2020, the City of Greenwood will receive \$358,841 of CDBG funding. To receive the funding, in 2019 the City completed a required Five-Year Consolidated Plan that assessed the needs in the community, relating to housing, social and public services, public infrastructure, following which it then outlines priorities and goals to address those needs. Each program year the City updates the community with an Action Plan, outlining specific projects and funding resources that will be used to meet the priorities and goals. At the end of each program year, the City will write a Consolidated Annual Performance and Evaluation Report (CAPER) to report the progress towards each of the Consolidated Plan goals. These three documents enable the public, elected officials and HUD to understand the needs in the community, provide input on funded activities, and measure progress and investment in the community.

This document comprises the annual Action Plan submittal for program year (PY) 2020 for the City of Greenwood. The City engaged a consultant, City Consultants LLC, to help with the



development of this document. The timeframe for this plan, PY2020, extends from October 1, 2020 to September 30, 2021. Initiation of the document's development was delayed due to the COVID-19 Pandemic. A full document must be submitted to HUD by February, 2021 for the City to receive its CDBG funding for program year 2020. This is not the normal timeframe for the development of the Action Plan, which typically is due to HUD in the month of August prior to the start of the program year. However, 2019 represents the first year of funding under the program for the City of Greenwood, which in addition to normal startup hurdles had to cope with the COVID-19 epidemic and an associated amendment to the 2019 program in order to accommodate additional (emergency) funding disbursed by HUD.

2. Summarize the objectives and outcomes identified in the Plan

The City has developed general priorities and goals to offer flexibility in programming for all communities and increase the coordination among service providers. These priorities are:

- 1. Expand and sustain the supply of safe, decent affordable housing.
- 2. Support programs that help the most vulnerable households with basic daily living needs.
- 3. Invest in public facility and public infrastructure needs of low-income neighborhoods.
- 4. Improve institutional structures and coordination among providers across the City and advocate for fair housing.

3. Evaluation of past performance

The City of Greenwood issued contracts to a few new projects in the summer of 2020 under the first year of funding. Starting new programs is challenging for any city, and with the unusual circumstances surrounding the 2020 COVID19 pandemic, HUD has allowed communities additional time to report final progress for the previous year. Each of those programs from the first year of funding is still underway. Final reporting for the 2019 fiscal year will be completed in March 2021.

4. Summary of Citizen Participation Process and consultation process

The Consolidated Plan process began in August, 2020, utilizing public open houses and of social media to collect information from the public, as well as administering stakeholder interviews, via phone and in person, to assist with data collection and to learn about the needs and assets in the community. The City hired a Consultant to oversee these activities, as well as write the Action Plan document. Interviews were conducted with social services providers, affordable housing



developers, business leaders, civic leaders, city department heads, and neighboring government organizations. A full list of those interviewed are included in Section AP-10, below. Section AP-12, below, describes the process of public involvement in more detail.

The City of Greenwood released a draft form of this document for a period of 5 days for review by stakeholders and the residents of the community; the use of a shortened period was enabled by the focus of some Action Plan strategies on concerns related to the COVID-19 Pandemic. The document was available on the City's website at <u>https://www.greenwood.in.gov/CDBG</u> and in print form at the Greenwood Public Library.

5. Summary of public comments

(To be completed following public review.)

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

(To be completed following public review.)

7. Summary

The PY 2020 Action Plan will continue the emphasis laid out in the five-year Consolidated Plan, and strive to understand more about the needs in the community and the best methods for addressing those needs. While the first year (PY 2019 Action Plan) focused on larger, city lead projects to become more familiar with the use of CDBG funding, other agencies have been building the capacity to apply for CDBG funding, with the result that this document includes more public service applications. The additional CDBG-CV funding has also provided opportunities for local public service agencies, particularly as these supplemental funds are not subject to the 15% program cap experienced by the traditional CDBG program.



PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

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

Agency Role	Name	Department/Agency
Lead Agency	GREENWOOD	Mayor's Office
CDBG Administrator	GREENWOOD	Mayor's Office

Table 1 – Responsible Agencies

Narrative (optional)

FY 2020 represents the second full year for the City's administration of its CDBG Program.

Consolidated Plan Public Contact Information

The City of Greenwood, Mayor's Office will be the public contact for the City's CDBG Program. Contact information is: CDBG Program – Kevin Steinmetz City of Greenwood 300 South Madison Avenue Greenwood, IN 46142 317-887-5000



AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

The City of Greenwood hired a consultant from City Consultants & Research, LLC to help with the writing of this Action Plan and conduct the public input process, including the consultations. Many of the needs changed over the past year due to the COVID-19 pandemic. The City of Greenwood staff also contacted a number of stakeholders to solicit input on the changing needs in the community. Consultations were conducted in person, one-on-one or via phone conference over a seven-month period.

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))

Founded in 1961, the United Way of Johnson County funds 18 local agencies and over 77 programs. Together, the programs serve 37,000 people per year, 13,321 of whom live within the two zip codes (46142 and 46143) of Greenwood.

United Way agencies provide direct care when clients have nowhere else to turn, especially considering generational and situational poverty. Programs offered through the agencies include a variety of direct services to clients, including emergency or crisis intervention for: housing and utility assistance, food insecurities, minimal car repairs, medical and prescription assistance, mental health referrals and support, mentoring, and financial literacy. The United Way of Johnson County hosts a monthly Impact meeting among supportive services and housing providers. The City of Greenwood will strive to attend these monthly meetings to connect CDBG funding as a resource to these providers.

Financial backing and support of United Way of Johnson County comes from contributions by local community members' contributions and donations. Six percent of the funding campaign comes from special events, other revenues, and grants. The 2018-2019 campaign raised \$1,571,000.



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.

With the growing number of middle- and upper-income residents in Greenwood, homelessness is a hidden and misunderstood issue in the community. The City of Greenwood is part of Region 11 in the Indiana Balance of State Continuum of Care as part of Johnson County, along with Shelby, Brown, Bartholomew, Decatur, Jackson, and Jennings Counties. The Indiana Balance of State Continuum of Care (CoC) is the planning body for initiatives in ending homelessness in the State of Indiana. To do so, this group supports the development and ongoing maintenance of a strategic, comprehensive system to address homelessness. This system includes strategies for engaging mainstream partnerships, the provision of shelter, temporary housing, services, and permanent housing. The goal is to ensure that all residents of the State of Indiana are able to access and maintain permanent housing.

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

Currently, there is no service provider or shelter that targets homeless individuals in Greenwood and service providers do not participate in the HMIS system. Through the consultation process, the consultants learned there are a variety of social service providers within the community, but coordination among them is limited. Many of the providers will refer people who seek help to another provider who is better able to provide the needed service, but that is the extent of the partnerships. Greater coordination among providers is needed and could be offered through the City of Greenwood. This coordination could help the community understand the unmet needs in the community better and create stronger partnerships to acquire other funding resources to meet the unmet needs in the community.



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

1	Agency/Group/Organization	Bridges Alliance of Johnson County
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services – Victims Services-homeless Services - Housing
	What section of the Plan was addressed by Consultation?	Social and supportive services
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a phone interview with staff to learn about the types of services provided by Bridges Alliance and what types of services are most needed in the current time, COVID-19 related impacts.
2	Agency/Group/Organization	Grace Assembly of God Food Pantry
	Agency/Group/Organization Type	Services – Food Insecurity
		Regional organization
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a phone interview with a staff to learn about daily needs living in food insecurity.
3	Agency/Group/Organization	The Social of Greenwood
	Agency/Group/Organization Type	Services - Housing Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Non-Homeless Special Needs
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a face to face interview with staff to learn the housing and service needs of the elderly and people living with a disability.

4	Agency/Group/Organization	INDIANA HOUSING AND COMMUNITY DEVELOPMENT AUTHORITY
	Agency/Group/Organization Type	Services-homeless Other government - State Planning organization Civic Leaders
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy Homelessness Strategy Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a face to face interview with a representative of the organization and received information and data on homeless needs from staff.
5	Agency/Group/Organization	Central Nine Career Center
	Agency/Group/Organization Type	Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy Education
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a phone interview with staff about the demand for employment training and vocational education in Greenwood for both adult and high school age children.
6	Agency/Group/Organization	Joy's House - UIndy
	Agency/Group/Organization Type	Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy Services for the Elderly
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a phone interview with a staff to learn about daily needs of those with elderly or disabled dependents.
7	Agency/Group/Organization	Gleaners Food Bank
	Agency/Group/Organization Type	Services – Food Insecurity
		Regional organization

	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a phone interview with a staff to learn about daily needs living in food insecurity.
8	Agency/Group/Organization	Greenwood Parks and Recreation
	Agency/Group/Organization Type	Government - Local
	What section of the Plan was addressed by Consultation?	Public Facilities and Infrastructure
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Face to face meetings on the needs of park facilities in low to moderate income areas.
9	Agency/Group/Organization	Kic-It
	Agency/Group/Organization Type	Housing Services-Children Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Homeless Needs - Families with children Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a phone interview about the Regional Planning for Balance of State CoC and the housing needs of the homeless.



10	Agency/Group/Organization	United Way of Johnson County
	Agency/Group/Organization Type	Services - Housing Services-Children Services-Elderly Persons Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Health Services-Health Services-Education Services-Employment Services-Fair Housing Services - Victims Regional organization Civic Leaders Foundation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Strategy Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a phone interview about the Region 11 Balance of State Continuum of Care and social service needs, especially for those with special needs. Attended monthly Impact meeting and utilized data from United Way to help with assessment.
11	Agency/Group/Organization	Habitat for Humanity of Johnson County
	Agency/Group/Organization Type	Housing Services - Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis Anti-poverty Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted a phone interview with the Executive Director to talk about the affordable housing market in Greenwood.
12	Agency/Group/Organization	Children's Organ Transplant Association
	Agency/Group/Organization Type	Services-Health Services
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs HOPWA Strategy



	How was the Agency/Group/Organization	Conducted phone interview with Committee
	consulted and what are the anticipated	members.
	outcomes of the consultation or areas for improved coordination?	
13	Agency/Group/Organization	Dynamic Music Therapy
	Agency/Group/Organization Type	Services-Education
		Services -Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs HOPWA Strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with Committee members.
14	Agency/Group/Organization	Greenwood Christian Church
	Agency/Group/Organization Type	Faith Based Organization
	What section of the Plan was addressed by Consultation?	Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
15	Agency/Group/Organization	Greenwood Public Schools
	Agency/Group/Organization Type	Services-Education
		Government - Other
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
16	Agency/Group/Organization	Harvest Food Pantry – SS Francis and Clare
	Agency/Group/Organization Type	Services-Food Insecurity
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
17	Agency/Group/Organization	Haven Sanctuary for Women
	Agency/Group/Organization Type	Services-Victims
		Services – housing
		Services – families and children
	What section of the Plan was addressed by	Housing
	Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
18	Agency/Group/Organization	HUD Indianapolis
	Agency/Group/Organization Type	Government - Federal
	What section of the Plan was addressed by	Housing
	Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff. Provided input and feedback on applications received.
19	Agency/Group/Organization	Inner Light Ministries
	Agency/Group/Organization Type	Faith Based Organization
	What section of the Plan was addressed by Consultation?	Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
20	Agency/Group/Organization	Ivy Tech Community College
	Agency/Group/Organization Type	Services – Education
		Services - Employment



	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
21	Agency/Group/Organization	Johnson County Community Foundation
	Agency/Group/Organization Type	Funding Organization
	What section of the Plan was addressed by	Housing
	Consultation?	Homelessness
		Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
22	Agency/Group/Organization	Johnson County Gateway Services
	Agency/Group/Organization Type	Services - disabilities
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
23	Agency/Group/Organization	Johnson Memorial Foundation
	Agency/Group/Organization Type	Funding Organization
	What section of the Plan was addressed by	Housing
	Consultation?	Homelessness
		Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
24	Agency/Group/Organization	Leadership Johnson County
	Agency/Group/Organization Type	Services - development
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy

	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
25	Agency/Group/Organization	Purdue Extension
	Agency/Group/Organization Type	Services – education
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
25	Agency/Group/Organization	Our Lady of Greenwood
	Agency/Group/Organization Type	Services-Food Insecurity
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
26	Agency/Group/Organization	Rotary Club of Greenwood
	Agency/Group/Organization Type	Regional Organization
	What section of the Plan was addressed by Consultation?	Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with members.
27	Agency/Group/Organization	Safe Families for Children of Central Indiana
	Agency/Group/Organization Type	Services – victims
		Services - children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.



28	Agency/Group/Organization	Salvation Army
	Agency/Group/Organization Type	Services – homeless
		Services – families
		Services – children
		Services - housing
	What section of the Plan was addressed by	Housing
	Consultation?	Homelessness
		Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
29	Agency/Group/Organization	Servants at Work (SAWs)
	Agency/Group/Organization Type	Services – housing
		Services - disabilities
	What section of the Plan was addressed by Consultation?	Housing
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
30	Agency/Group/Organization	St. Thomas Clinic
	Agency/Group/Organization Type	Services – health
		Services – mental health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
31	Agency/Group/Organization	The Refuge
	Agency/Group/Organization Type	Services – food insecurity
	What section of the Plan was addressed by Consultation?	Anti-poverty strategy

		,
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
32	Agency/Group/Organization	Upstream Prevention
	Agency/Group/Organization Type	Services – health
		Regional organization
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
33	Agency/Group/Organization	Vineyard Community Church
	Agency/Group/Organization Type	Faith based organization
		Regional organization
	What section of the Plan was addressed by Consultation?	Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.
34	Agency/Group/Organization	Visit Indy
	Agency/Group/Organization Type	Regional organization
	What section of the Plan was addressed by	Housing
	Consultation?	Anti-poverty strategy
	How was the Agency/Group/Organization consulted and what are the anticipated outcomes of the consultation or areas for improved coordination?	Conducted phone interview with staff.

Table 2 – Agencies, groups, organizations who participated

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

The City of Greenwood consulted with a variety of organizations. The City welcomes comments and conversations with stakeholders throughout the entire fiscal year.

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

The City's staff conducted regular interviews with community stakeholders to introduce the Community Development Program, discussing problems and solutions the City could address with its new program. The team continues its consultation process through the entire fiscal year to understand the changing needs in the community as a result of the COVID-19 pandemic.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Indiana Balance of State -	The Consolidated Plan
	Region 11	includes goals initiated by
		the Region 11 Council of the
		Indiana Balance of State
		Continuum of Care.

Table 3 – Other local / regional / federal planning efforts



AP-12 Participation - 91.105, 91.200(c)

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

In response to the COVID-19 Pandemic, the City of Greenwood conducted public input via a virtual format, including hosting virtual meetings to solicit input and posting all documents electronically for review by the general public and interested parties. One meeting was held in an in-person format but due to restrictions, was hosted outside and socially distanced.

The first way the City solicited input from the community was via electronic survey. The survey was available for the entire month of October. The City of Greenwood found the following results.

The second way the City solicited input from the community was via public meetings. The first meeting, held in a virtual format on October 15, 2020, had ten people in attendance. After a brief presentation on the City's CDBG program and the survey results at that time, the City's staff answered questions from the attendees and vice versa. The second meeting, held on October 26, 2020, was outdoors at the Greenwood Amphitheater where attendees could properly social distance themselves from each other. This meeting utilized a panel to discuss the issues and challenges surrounding affordable housing in Greenwood as well as the entire area of Johnson County. The first 40 minutes involved the panelists answering questions that were provided by the host, Aspire, and from the crowd. An additional 20 minutes were provided for breakout groups to discuss the specific housing needs in the communities of Johnson County, including the city of Greenwood. Approximately 14 people attended this outdoor meeting.

The United States Department of Housing and Urban Development (HUD) has issued guidance that that waives the Citizen Participation Plan requirements for entitlement recipients, provided that (1) no fewer than five days are provided for public comment and that (2) reasonable notice and the opportunity to comment is provided. Therefore, the City of Greenwood released a draft of the 2020 Action Plan for a five-day comment period. Copies were available to the public from 02/25/2021 until 03/04/2021.



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Citizen Participation Outreach

Sort Orde r	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	Public Meeting	Non-targeted/broad community	The City of Greenwood a virtual meeting on October 15, 2020 at 5:30 pm. 10 people attended the meeting.	Some comments include: The City of Greenwood needs to continue to prevent evictions in the time of COVID-19. It's more than COVID1-19, the City has a lack of affordable housing. There is a need for daily living needs, such as car repairs for when the limited transportation cannot get a family member to work or a child/student to school. The community needs a "place" where people seeking help can find help in Greenwood.	All comments were accepted as part of this meeting.	

Sort Orde r	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Public Meeting	Non-targeted/broad community	The City of Greenwood hosted a public meeting outside at the amphitheater on October 26, 2020 with a panel to discuss affordable housing in Greenwood and Johnson County. 14 people attended the meeting.	Panel: Brad Coffing (MIBOR), Erin Slevin (Bridges Alliance), Lee Ann Wilbur (Habitat for Humanity), and Andrew Bradley (Prosperity Indiana) The first 40 minutes of the meeting allowed the panel to answer questions on affordable housing and the second 20 minutes allowed smaller groups to talk about needs in individual Cities or towns. No one joined the Greenwood small break out group.	All comments were accepted as part of this meeting.	
З	Survey	Non-targeted/broad community	The City of Greenwood released a survey for the month of October, 2020 and collected 60 responses.	A copy of the survey and summary of the survey responses has been included as an appendix to this document.	All comments were accepted as part of this meeting.	
4	Five-Day comment period.	Non-targeted/broad community	Five-day comment period for the 2020 Action Plan. February 25, 2021 to March 4, 2021.			

Table 4 – Citizen Participation Outreach

Expected Resources

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

Introduction

In PY2020, the City of Greenwood will receive \$358,841 of CDBG funding. The funding will be used to promote affordable housing development, sustain the affordable housing in the community, make improvements to public facilities, and support services that meet basic daily living need of low-income residents.

Uses of Funds **Expected Amount Available Year 2** Narrative Description Expected Program Source of Amount **Prior Year** Total: Annual Program Available Funds Allocation: Income: \$ Resources: \$ \$ Remainder \$ of ConPlan \$ Acquisition Funding will be used for Admin and Planning the public services, Economic infrastructure development public Development CDBG 358,841 0 0 358,841 1.076.523 and supporting housing Housing development for moderate federal Public and low-income Improvements households. **Public Services**

Anticipated Resources

Table 5 - Expected Resources – Priority Table



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

Greenwood, because it is only in its second year of administering the CDBG program, will follow HUD regulations and will not require projects to provide match. However, Greenwood will fund projects and programs that will only require gap financing and have other funds to complete the project. In future years, if demand for CDBG funding increases, the City of Greenwood may update its policies to require match or a certain percent of leveraging.



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

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

Discussion

Greenwood, because it is only in its second year of administering the CDBG program, will follow HUD regulations and will not require projects to provide match. However, Greenwood will fund projects and programs that will only require gap financing and have other funds to complete the project. In future years, if demand for CDBG funding increases, the City of Greenwood may update its policies to require match or a certain percent of leveraging.

Social service providers, including those who serve the homeless and people with special needs, rely on other sources of funding. For many of the social service agencies, private resources fill the most of the budget needs, with public funding covering smaller gaps in operating and programmatic costs. It is in this area of programming that the City of Greenwood will have the most impact in the community. CDBG recipients for public services will be awarded \$53,826 from the CDBG program, leveraging \$548,756 in other sources of funding. Similarly, the \$10,000 in CDBG funds for neighborhood improvements will leverage \$25,000 in other funds, and the \$9,000 in CDBG funds for housing improvements will leverage \$9,687 in other funds.



Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

The table below outlines the Consolidated Plan goals towards which activities in PY 2020 will be applied. There are two (2) goals omitted from the table because no funding is allocated towards them during PY 2020.

Sort	Goal Name	Start	End	Category	Geographic	Needs	Funding	Goal Outcome
Order		Year	Year		Area	Addressed		Indicator
1	Housing -	2019	2023	Affordable	City Wide	General	CDBG:	Six (6) low-mod
	Owner			Housing	Initiatives	Housing	\$9,000	income
	Occupied							households to
	Repair							be served.
2	Self Sufficiency	2019	2023	Homeless	City Wide	Social	CDBG:	Ninety -two
	- Basic Public			Non-	Initiatives	Services	\$53,826	(92) low-mod
	Services			Homeless		General		income
				Special				individuals
				Needs				served.
3	Public Facility	2019	2023	Non-Housing	Low Mod	Public	CDBG:	Public Facility
	Improvement			Community	Census	Infrastructure	\$224,246.65	or
				Development	Tracts	and Facility		Infrastructure
						Improvement		Activities other
								than
								Low/Moderate
								Income
								Housing
								Benefit: 300
								Persons
								Assisted
4	Administration	2019	2023		City Wide	Institutional	CDBG:	Other: 1 Other
	and Fair				Initiatives	Structure	\$71,768	
	Housing							

Table 6 – Goals Summary



Goal Descriptions

1	Goal Name	Housing - Owner Occupied Repair	
	Goal Description	Improve the quality of affordable housing through owner occupied repair programs.	
2	Goal Name	Self Sufficiency - Basic Public Services	
	Goal Description	Support public services that provide basic daily living needs.	
3	Goal Name	Public Facility Improvement	
	Goal Description	Adapt public facilities that serve disabled neighbors in the community.	
4	Goal Name	Administration and Fair Housing	
	Goal Description	Fund legal services, including fair housing initiatives.	



Projects

AP-35 Projects – 91.220(d)

Introduction

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

Due to limited time restraints and the newness of the program, the City of Greenwood has allocated funding to city directed projects, such as park improvements. This is to allow for the City to become better acquainted with the federal regulations as it implements the project.

The City of Greenwood has allocated a small portion of its allocation towards housing preservation for low to moderate income residents. Of the five units of affordable housing renovations the City would like to fund in the next year, all five will be homes for moderate income households, earning between 51 and 80 percent HAMFI.

The City of Greenwood also allocated the maximum amount allowed for public services, 15 percent. The City of Greenwood will have an application process in the fall to determine which specific programs will receive funding under the 15 percent allocation.

Projects

#	Project Name
1	Administration
2	Westwood Elementary School Playground Improvements
3	KIC-IT
4	Safe Families for Children in Central Indiana - Foster Care Services
5	Servants at Work, Inc. (SAWs) Accessibility Improvements
6	Saint Thomas Clinic Air Quality Improvements
7	United Way of Johnson County - No Place to Call Home Program
8	Greenwood Parks – Northeast Park

Table 7 - Project Information

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

The 2019-2023 Consolidated Plan discusses the challenge of addressing the needs in the community because the program is new to the community. The City of Greenwood offered a competitive funding application process for service and housing providers in the winter of 2020-21. CDBG funding for programs is directed to programs and projects that meet the following criteria:

- Meet a goal of the 2019-2023 Consolidated Plan
- Demonstrate a significance of need
- Serve an eligible area within Greenwood
- Project or program is eligible under HUD rules
- Create a visual impact in the neighborhood, particularly if an infrastructure project

Activities and projects that meet all the above criteria receive the highest priority, reducing the amount of funding spent on programs or projects that do not meet the underserved communities and households.



AP-38 Project Summary

Project Summary Information

1	Project Name	Administration and Fair Housing
	Target Area	City Wide Initiatives
	Goals Supported	Administration and Fair Housing
	Needs Addressed	Institutional Structure
	Funding	CDBG: \$71,768.20
	Description	Fund administrative costs and legal services, including fair housing initiatives. This project is eligible under 24 CFR Part 570.206 (a).
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	Not applicable to this project.
	Location Description	300 South Madison Avenue, Greenwood, IN
	Planned Activities	The City of Greenwood will provide overall program management and oversee all program design and implementation activities of sub-recipients and contracted services. The City will also fund fair housing activities, such as education and testing.



2	Project Name	Westwood Elementary School Playground Improvements
	Target Area	City-Wide Initiatives
	Goals Supported	Public Infrastructure - Neighborhood Improvements
	Needs Addressed	Public Infrastructure and Facility Improvement
	Funding	CDBG: \$31,504.24 Total project cost: \$31,504.24
	Description	Make improvement to playground equipment in school that has programs serving children with physical disabilities and other special needs. This project is eligible under 24 CFR Part 570.201 (c).
	Target Date	9/30/2021
	Estimate the number and type of families that will benefit from the proposed activities	100 students
	Location Description	899 County Rd 150 W, Greenwood, IN 46143
	Planned Activities	The purpose of this project is to provide additional age appropriate playground equipment for pre-school special needs students. Westwood Elementary houses our pre-school special needs program and has a designed special needs playground that provides access for students in wheel chairs and other specific needs.
3	Project Name	KIC-IT
	Target Area	City Wide Initiatives
	Goals Supported	Self Sufficiency - Basic Public Services



	Needs Addressed	Social Services General
	Funding	CDBG: \$26,000 Other Local: \$23,000 Total: \$49,000
	Description	Funding will be available for social service programs that meet the basic daily living needs of the most vulnerable residents in Greenwood. This project is eligible under 24 CFR Part 570.201 (e).
	Target Date	3/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	20 Persons
	Location Description	592 Ironwood Dr, Franklin, IN 46131
	Planned Activities	The scope of services provided by KIC-IT work to assist homeless youth & young adults (ages 15-26), or those who are at risk of being homeless in Johnson County. KIC-IT's mission directly contributes to the quality of life and direct economic impact for commerce, for individuals and families who call Johnson County home. KIC-IT provides wraparound services.
4	Project Name	Safe Families for Children in Central Indiana – Foster Care Services
	Target Area	City Wide Initiatives
	Goals Supported	Self Sufficiency - Basic Public Services
	Needs Addressed	Social Services General
	Funding	CDBG: \$10,000 Other Local: \$305,500 Total: \$314,500



	Description	Funding will be available for social service programs that meet the basic daily living needs of the most vulnerable residents in Greenwood. This project is eligible under 24 CFR Part 570.201 (e).
	Target Date	3/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	50 individuals
	Location Description	7168 Graham Road, Indianapolis IN 46250
	Planned Activities	Parents voluntarily place their children with safe, loving, and screened host families where they are cared for while additional volunteer mentors help parents to restore stability in their lives. SFFC strives to meet three objectives: 1) prevent child abuse by providing safe, temporary homes for children from families in crisis, 2) support and stabilize families in crisis by providing mentoring and referrals to appropriate resources, and 3) deflect children from entering the child welfare system by keeping healthy families intact and reunifying children with their parents.
5	Project Name	Servants at Work, Inc. (SAWs) Accessibility Improvements
	Target Area	City Wide Initiatives
	Goals Supported	Housing - Owner Occupied Repair
	Needs Addressed	General Housing
	Funding	CDBG: \$9,000 Other Local: \$9,687 Total: \$18,687



	Description	SAWs has one focus; to build ADA approved high quality removable and reusable wooden wheelchair ramps for mobility challenged, low-income residents living at or below 80% AMI and having no other means of receiving a ramp.
	Target Date	3/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	6 housing units
	Location Description	8427 Zionsville Rd., Indianapolis, IN 46268
	Planned Activities	To build six ADA approved high quality removable and reusable wooden wheelchair ramps for mobility challenged, low-income residents.
6	Project Name	Saint Thomas Clinic Air Quality Improvements
	Target Area	Low Mod Census Tracts
	Goals Supported	Public Infrastructure - Neighborhood Improvements
	Needs Addressed	Public Infrastructure and Facility Improvement
	Funding	CDBG: \$10,000 Other Local: \$25,000 Total: \$35,000
	Description	Installation of air purifiers in community health clinic that serves low- and moderate-income community residents. This project is eligible under 24 CFR Part 570.202 (a) (4).
	Target Date	3/1/2022



	Estimate the number and type of families that will benefit from the proposed activities	The project will benefit 200 people.
	Location Description	600 Paul Hand Blvd. Franklin, IN 46131
	Planned Activities	Our project: Clean Air, will allow us to purchase air purifiers that attach to the existing HVAC units and assist in cleaning the air, thereby making the air safer (even though we will all be wearing masks) at a community health clinic. Improve air quality for low-mod income residents seeking health care. This project will prevent, prepare for, and respond to coronavirus.
7	Project Name	United Way of Johnson County – No Place to Call Home Program
	Target Area	City Wide Initiatives
	Goals Supported	Self Sufficiency - Basic Public Services
	Needs Addressed	Social Services General
	Funding	CDBG: \$17,826.15 Local funds: \$220,256.17 Total: \$238,082.32
	Description	Funding will be available for social service programs that meet the basic daily living needs of the most vulnerable residents in Greenwood. This project is eligible under 24 CFR Part 570.201 (e).
	Target Date	3/1/2022
	Estimate the number and type of families that will benefit from the proposed activities	The project will benefit 12 households in the City of Greenwood.



	Location Description	594 Ironwood Drive, Franklin, IN 46131
	Planned Activities	No Place to Call Home is a unique program designed to provide homeless prevention and intervention services to Johnson County residents. No Place to Call Home provides a coordinated entry system for individuals and families to be assessed for and receive services to prevent homelessness or find stable housing for those who are homeless. Grant funding from the City of Greenwood would allow No Place to Call Home to continue to offer high quality services to homeless and near homeless residents in Greenwood. Funds would be used to 1) support the costs of coordination efforts including personnel, benefits, occupancy and other program expenses of the coordination budget and 2) utilize funds for financial assistance for individuals in the program to prevent homelessness.
8	Project Name	Greenwood Parks – Northeast Park
	Target Area	Low Mod Census Tracts
	Goals Supported	Public Facility Improvement
	Needs Addressed	Public Infrastructure and Facility Improvement
	Funding	CDBG: \$182,742.41 Total: \$182,742.41
	Description	Replace/upgrade site amenities in park (water fountains, restrooms, seating, play equipment). Suggested parks are Westside Park and Northeast Park. This project is eligible under 24 CFR Part 570.201 (c).
	Target Date	9/30/2020



	Estimate the number and type of families that will benefit from the proposed activities	100 Persons
	Location Description	To be determined.
	Planned Activities	Replace/upgrade site amenities in park (water fountains, restrooms, seating, play equipment at Northeast Park.



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

Community Development Block Grant funding must be used to meet one of three national objectives, including serving low to moderate income people/housing/areas. The City of Greenwood has a number of areas which meet the HUD definition of a low to moderate income area, with 51 percent of the residents earning an income 80 percent or below the HUD Area Median Family Income (HAMFI). Funds may also be used to assist low to moderate income households, or those earning at or below 80 percent of the median family income. The table below shows the income limit by household size for the City of Greenwood.

	Size of household							
	1-	2-	3-	4-	5-	6-	7-	8-
	person	person	person	person	person	person	person	person
Income Limit – 80% of								
HAMFI	\$38,150	\$43,600	\$49,050	\$54,500	\$58,900	\$63,250	\$67,600	\$71,950

Table 8 – HUD Income Limits

Geographic Distribution

Target Area	Percentage of Funds
Low Mod Census Tracts	50.9
City Wide Initiatives	49.1

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

CDBG funds will be concentrated in those block groups with at least 51 percent low and moderate-income households; see Figure 2, below for identification of these areas. With concentrations of housing problems and racial minorities in these areas, it is imperative the City of Greenwood focus its efforts in those areas to improve the quality of life for those residents.



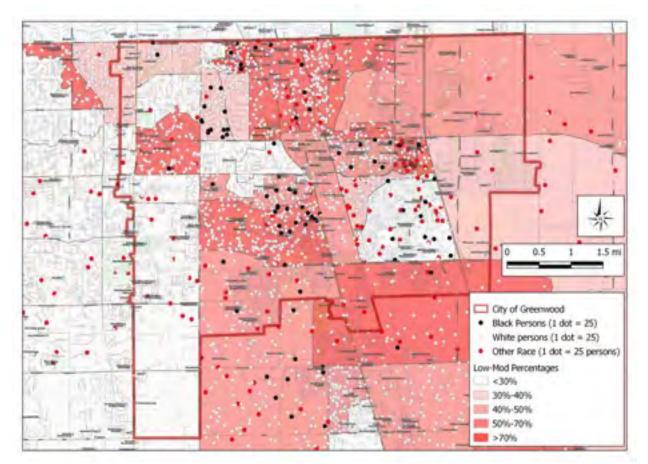


Figure 2 - Residents by Race and Income Area

Discussion

Please see discussion points in the sections above.



Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

One Year Goals for the Number of Households to be Supported					
Homeless	0				
Non-Homeless	0				
Special-Needs	6				
Total	6				

 Table 10 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Househo	olds Supported
Through	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	6
Acquisition of Existing Units	0
Total	6

Table 11 - One Year Goals for Affordable Housing by Support Type

Discussion

Due to the overwhelming demand for public assistance associated with impacts from COVID-19, the City has prioritized activities to meet these needs, along with public facilities projects, for the PY 2020 CDBG program. The City of Greenwood is actively searching for an organization that will offer affordable housing development in the community. During the PY2020 Action Plan application process, one organization applied for funding, Servants at Work, Inc. (SAWS), an organization that builds ADA approved high quality removable and reusable wooden wheelchair ramps for mobility challenged, low-income residents living at or below 80% AMI and having no other means of receiving a ramp. In the coming year, SAWs will assist 6 households with accessibility.



AP-60 Public Housing – 91.220(h)

Introduction

The City of Greenwood does not have a locally based public housing provider nor a housing choice voucher provider. The State of Indiana, through the Indiana Housing and Community Development Authority subcontracts the housing choice voucher program to Human Services, Inc., to serve Johnson, Shelby, Bartholomew, Decatur, and Jackson Counties. Human Services, Inc. has several locations but the Johnson County location is in Franklin, IN. There are no public housing units, or multifamily housing owned by a public housing agency, located within the City of Greenwood. There are rental properties that accept housing choice vouchers within the City of Greenwood and there is a total of 3,973 households utilizing a housing choice voucher.

The Section 8 program, or Housing Choice Voucher, program offers subsidy to a household to allow them to rent any apartment in the local housing authority's jurisdiction. The household will pay 30 percent of their gross monthly income towards rent and the Housing Choice Voucher covers the remaining cost of the rent. Thus, if a two-bedroom apartment is \$700 per month and the household can only afford \$250 per month, the remaining \$450 of rent is paid by the NHA through the voucher.

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

The most immediate need for the City is advocating for additional voucher assistance. The waiting lists for the limited affordable housing projects in the City are long or closed. Through stakeholder interviews, the need for additional rental subsidies, particularly for seniors is high.

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

Housing Choice Vouchers from the U.S. Department of Housing and Urban Development (HUD) allow households to access housing that would not be affordable to them. The household pays 30 percent of their gross monthly income and the voucher pays the remainder of the rent owed to the landlord.

Through the administration of CDBG programs, the City of Greenwood will support public services across the community. The City of Greenwood will require public service recipients to have available information about affordable homeownership programs and fair housing in all locations where CDBG funded services are provided. Voucher recipients may find information about homeownership opportunities if they receive supportive services from a CDBG supported program.



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

Not applicable

Discussion

The City of Greenwood does not have any public housing units within the City limits. The Indiana Housing and Community Development Authority only offers housing choice vouchers to low income residents in Greenwood. Currently there are no affordable housing developers based in Greenwood, Indiana. The City of Greenwood will utilize the next five years of this Consolidated Plan to identify and educate landlords about the Housing Choice Voucher program to make available more housing for those people wishing to live in Greenwood but need a subsidy to live in Greenwood.



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

Introduction

The Indiana Balance of State Continuum of Care (CoC) is the planning body for initiatives in ending homelessness in Indiana. To do so, this group supports the development and ongoing maintenance of a strategic, comprehensive system to address homelessness. This includes strategies for engaging mainstream partnerships, the provision of shelter, temporary housing, services, and permanent housing. The goal is to ensure that all residents of the state of Indiana are able to access and maintain permanent housing.

The Indiana Balance of State Continuum of Care is made up of 91 counties in 16 distinct regions. Each region has a region chair and is comprised of providers who serve people experiencing homelessness or at risk of homelessness. All regions are part of the IN Balance of State CoC Collaborative Application to HUD for McKinney Vento funding.

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

Greenwood, as part of Johnson County, is part of Region 11 in the State of Indiana Continuum of Care, made up of seven counties: Bartholomew, Brown, Decatur, Jackson, Jennings, Johnson, and Shelby. The council has meetings every other month at Human Services, Inc. in Bartholomew County. The group has taken an active role in the Point in Time Count and is working with a formally homeless individual to help "find" homeless neighbors in the community. By finding the homeless neighbors, the Continuum can better understand the needs of the community. Formerly homeless neighbors, working through the providers, offer expertise on the strength of programs in the community and the gaps in services to the Region 11 Council. The CoC will utilize next year to strengthen the homeless service network, improving the assessment of the homeless community and its needs, recurring more providers to utilize HMIS data tracking systems and Coordinated Entry systems.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City of Greenwood does not have any crisis shelter or emergency beds. Households seeking crisis housing often rely on shelters in neighboring communities.



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

Due to low point in time count numbers in Johnson County and its proximity to Marion County/Indianapolis, homeless services are often found in other counties of the Region where a need and number of homeless individuals is greater. This fact does not look to change in the next five years. Stakeholders suggested that a Rapid Re-Housing (RRH) program located in Greenwood may be an easier program to implement, over high cost of developing a shelter. Based on best practices, Rapid Re-Housing may be a more successful intervention in the area. The City of Greenwood will work with the providers in PY2020 within Region 11 to determine how a program with an RRH component can be implement in the community. Expected implementation of any pilot project would be in PY2022 or PY2023.

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

Limited financial resources prohibit the City of Greenwood from supporting any one project or program with a significant amount of funds. The City can spend up to 15 percent of its annual allocation towards public services. The City hosted an open application process to accept applications for public services, meeting the basic needs of the City's most vulnerable residents. In PY 2020, the City will provide \$26,000 in CDBG funding for KIC-IT, an organization whose scope of services is to assist homeless youth & young adults (ages 15-26), or those who are at risk of being homeless in Johnson County. KIC-IT provides wraparound services to these households and individuals.

Discussion

Discussion points are included in the narratives above.



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

Introduction:

While barriers to affordable housing can come from anywhere, the U.S. Department of Housing and Urban Development (HUD) recognizes a few universal barriers. Local and state regulations on zoning and building are the most recognized barriers to affordable housing. With increased regulation comes an increased cost to build housing that meets all regulations.

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

To help the community as a whole overcome the barriers to affordable housing development, and also maximize the impact in the community, the City of Greenwood will strive to achieve the following goals:

- 1. Expand and sustain the supply of safe, decent affordable housing.
- 2. Support programs that help the most vulnerable households achieve self-sufficiency.
- 3. Invest in public facility and public infrastructure needs of low-income neighborhoods.
- 4. Improve institutional structure and coordination among providers.

Discussion:

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

- Select target areas based on proximity to transportation options
- Attract for-profit developers to partner with non-profit service agencies to develop affordable housing development for extremely low-income families; connecting services and rental assistance with new developments
- Build projects without long-term debt to help fund operations and maintenance of property
- Advocate for public and private transportation options for low-income families living outside of walking distance of amenities needed for daily living, such as grocery stories, health care and employment options



- Enlist all levels of City government to be "cheerleaders" for affordable housing
- Feed positive stories to media outlets to counter negative stories oriented from the urban core

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

As a new CDBG program, the City of Greenwood will serve as an advocate for affordable and fair housing in the community. The Analysis of Impediments to Fair Housing outlines a number of opportunities to reduce the impediments or eliminate the impediments found to fair housing choice. These opportunities include:

- Passing a local fair housing ordinance to include all protected classes, including race, color, age sex, sexual orientation, gender identify, disability, national origin, religion, income status, veteran status, limited English proficiency, or any other protected classification under federal law.
- Begin a testing program to determine if any housing discrimination exists in the local rental housing market.
- Begin a fair housing education program for local housing providers, supportive services providers, realtors, landlords, management companies, and elected and appointed officials of the City government.



AP-85 Other Actions - 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

The 2019-2023 Consolidated Plan discusses the challenge for Greenwood is that many of the people the funding is intended to benefit are hidden among the middle class and wealthy in the growing community. As recently as June, 2019, local news media has reported the development of a 180-unit luxury apartment building that will charge rents ranging from \$900 to \$1,400 per month. The desire to create luxury housing often overshadows the need for all types of housing.

The situation this past year was greatly complicated by the COVID-19 Pandemic, which disrupted employment, services, and rent payments nationwide. HUD responded by providing supplemental CDBG assistance (CDBG-CV) that the City used for additional public services, responding directly to needs triggered by the Pandemic. These funds are addressed in the PY2019 Action Plan (as amended).

The City of Greenwood offered a competitive funding application process for service and housing providers in the fall of 2019. CDBG funding for programs was to be directed to programs and projects that meet the following criteria:

- Meet a goal of the 2019-2023 Consolidated Plan
- Demonstrate a significance of need
- Serve an eligible area within Greenwood
- Project or program is eligible under HUD rules
- Create a visual impact in the neighborhood, particularly if an infrastructure project

Activities and projects that met multiple of the above criteria received higher priority, reducing the amount of funding spent on programs or projects that do not meet the underserved communities and households. It is noteworthy that without the supplemental CDBG-CV monies, several applications for public services would have gone unfunded.

Actions planned to foster and maintain affordable housing

The primary strategy in 2019 to 2023 for the Greenwood CDBG Program is to close the gap on housing for households earning less than 30 percent of the area median income. With so few housing units are available and affordable to this income bracket it is essential to families living in poverty to have more housing options. And, the new housing options must be closer to work, transportation options and public amenities such grocery stores, health care and schools. Under



each priority of the Consolidated Plan, the City of Greenwood has listed additional strategies that will receive support but may not receive direct funding from the City's CDBG program.

The PY 2020 Action Plan advances this goal through is support of the Servants at Work, Inc. (SAWS) application. This organization provides high quality- removable, and reusable wooden wheelchair ramps for mobility challenged low-income residents, enabling them to remain in their existing housing unit and avoid relocation. In PY2020, the SAWs will assist 6 households with persons living with a disability to improve access to their homes.

Additional Strategies with non-financial support:

- 1. Support affordable multi-family housing development offering housing for incomes earning 0-30 percent of the area median family income.
- 2. Support public and private partnerships to develop affordable housing, with a goal of 10 percent of new residential building permits to be issued for housing units.
- 3. Support affordable, senior housing development.
- 4. Find additional resources for rental subsidies that support extremely low-income households or those earning 0-30 percent of the area median income.
- 5. Support the quality of affordable rental housing through repair assistance programs.

Actions planned to reduce lead-based paint hazards

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

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

Actions planned to reduce the number of poverty-level families

The primary strategy in 2019 to 2023 for Greenwood will be to close the gap on housing for households earning less than 30 percent of the area median income and assist with basic daily living needs.



With so few housing units available and affordable to this income bracket, it is essential for families living in poverty to have more housing options. And, the new housing options must be closer to work, transportation options and public amenities such grocery stores, health care and schools. Through the priority, to *expand and sustain the supply of safe, decent affordable housing*, Greenwood will address this need.

Actions planned to develop institutional structure

The City of Greenwood's CDBG Program's final goal does not have any specific projects or programs that will be funded by the City. Through administrative efforts and partnerships in the community, the City will work to increase coordination across the community, with the intended outcome of improving services for low-income households. The United Way's Impact Network and Region 11 of the Balance of State Continuum of Care can provide an outlet for this coordination and capacity building.

Priority #4 – Institutional Structure - Improve institutional structure and coordination among providers across the City and advocate for fair housing. Suggested strategies to meet this priority are:

- 1. Participate in the Regional Continuum of Care and support homelessness prevention and intervention initiatives.
- 2. Connect with the City of Indianapolis and regional initiatives to support individuals living with HIV/AIDS in Greenwood.
- 3. Support fair housing initiatives and education in the community.

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

The United Way of Johnson County is the primary way to connect all service providers throughout Greenwood. The Network will continue its efforts to build capacity and coordinate service provisions across the county in the coming year. The City of Greenwood will join this effort and support institutional coordination among providers.

The City of Greenwood wants to support and expand the efforts of this organization to not only build up the capacity of its members, but to also connect the members to local housing providers and the Region 11 Planning Council for the Indiana Continuum of Care. By connecting the three different organizations, planning efforts will be more streamlined and projects developed from those efforts will go more to address the households and individuals with the most need.



Discussion:

The Annual Action Plan will address many items as noted in the previous discussion points. However, as a recipient of HUD funds, Greenwood certifies it will affirmatively further fair housing choice by conducting an analysis of impediments to fair housing choice, take appropriate actions to overcome the effects of any impediments identified, and maintain records reflecting the analysis and actions taken in this regard. The City is committed to ensuring fair housing choice for all residents within its jurisdiction. The City completed an Analysis of Impediments to Fair Housing in conjunction with this Consolidated Plan, covering the years 2019 through 2023, same as the Consolidated Plan.

The Analysis of Impediments to Fair Housing evaluated regulations as to zoning and planning regulations and their impact on housing. The Analysis of Impediments did not find any types of zoning that impose limits on housing, but did find that architectural design elements could be cost prohibitive towards the development of affordable housing. The study has found that the following impediments to fair housing choice:

- No comprehensive list of landlords accepting housing choice vouchers, making it difficult for those holding vouchers to locate housing.
- No clear way to report housing discrimination within the City of Greenwood nor is there a fair housing ordinance for the City.
- It is not clear whether the architectural standards for new construction bias residential development towards or away from single-family units. However, they may increase the transactional costs for affordable housing development.
- The Greenwood Comprehensive Plan is largely focused on single family housing units.

Greenwood, as a recipient of federal CDBG, must take appropriate actions to overcome the effects of the impediments identified within this plan and maintain records reflecting the analysis and actions taken. This list below shows actions called for in the Analysis of Impediments to Fair Housing (AI) developed simultaneously with the Consolidated Plan last year:

- 1. Fund the development of affordable housing at a greater rate.
- 2. Advocate on behalf of affordable housing developers in the community to bring state and federal resources to the City of Greenwood.
- 3. Publish a listing of rental properties that will accept housing choice vouchers and other housing assistance to help households locate affordable housing in the City of Greenwood
- 4. Provide educational programming for public officials, particularly who are newly elected, on fair housing issues.
- 5. Establish a website, linked to the main City of Greenwood home page that will promote fair housing and connect residents to places of advocacy and investigative knowledge. This web page should include direct links to the U.S Department of



Housing and Urban Development's Fair Housing website, as well as the Indiana Civil Rights Commission and the Fair Housing Center of Central Indiana.

- 6. The City should clarify its anti-discrimination policy fair housing ordinance that includes all the usual protected classes as well as sexual orientation and gender identity and veteran military status.
- 7. Work with partners to actively promote fair housing testing within the Greenwood rental housing community.



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

Introduction:

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The City's CDBG program has not collected any program income to date and does not expect to utilize any program income in PY2020.

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(l)(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 \$0 the start of the next program year and that has not yet been reprogrammed
- 2. The amount of proceeds from section 108 loan guarantees that will be used \$0 during the year to address the priority needs and specific objectives identified in the grantee's strategic plan
- 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 \$0 planned use has not been included in a prior statement or plan.
- 5. The amount of income from float-funded activities \$0 \$0
- Total Program Income

Other CDBG Requirements

- 1. The amount of urgent need activities
- 2. The estimated percentage of CDBG funds that will be used for activities 100% 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.



Annual Action Plan 2020

51

\$0

Appendix A –

- Public Notices
- Meeting Notes
 - Survey
- Survey Results
- Summary of Public Comments



Alicia, The City of Greenwood is eligible to receive Community Development Block Grants (CDBG). We are trying to determine the greatest needs in the city and are looking for your input. You can participate in three ways.

- 1. **Take a short survey**. Please answer all questions. Your information won't be shared. <u>2020 CDBG Citizen Survey</u>
- Participate in a virtual CBDG Community Conversation October 15, 2020 | 5:30 PM Webex Meeting link: <u>https://cityofgreenwood.my.webex.com/cityofgreenwood.my/j.php?</u> <u>MTID=m75ad34fb22ef33d68620f2111b51c9c8</u> Meeting number:132 998 7608 Password:1234 RSVP for the Virtual CDBG Community Conversation to: Molly Laut @ <u>mailto:lautm@greenwood.in.gov?subject=RSVP Yes, CDBG Community</u> <u>Conversation</u>
- 3. Participate in a **live Aspire Community Matters** forum October 28, 2020 | 3:00 PM | Greenwood Amphitheater | <u>Register Here</u>

A committee has been created to assist with the determination of projects. Learn more about CDBG Grants and what has been done so far at: <u>www.greenwood.in.gov/CDBG</u>.

Let us know if you would like to be added to an email list to receive updates about the program.

- YES, add my name to the list
- NO, not at this time. Please remove me from future notifications.

Please forward this email to others in your network. Thank you for your input.

CDBG Main Contact: Kevin Steinmetz – Office of the Mayor Capital Projects Manager <u>steinmek@greenwood.in.gov</u>

MOLLY LAUT Office of the Mayor Strategic Marketing & Community Relations

G R E E N W O O D 300 South Madison Avenue ML

Greenwood, IN 46142 317.887.5008 office 317.650.8795 mobile lautm@greenwood.in.gov greenwood.in.gov

2020 CDBG | Citizen Survey

Step 1 of 1

Your feedback is important to us. The City of Greenwood encourages and seeks the advice of its citizens in planning, implementing, and assessing the goals of the Community Development Block Grant (CDBG) program. Program goals are: to provide decent housing and a suitable living environment, and expand economic opportunities principally for low and moderate-income people. The data collected in this survey will be used to determine need. All name and address information will be redacted. More details about our program is available at: www.greenwood.in.gov/CDBG

Please fill out the following survey as completely as possible.

* Denotes a required field

Contact Information

All data collected in this survey will be used for reporting to HUD only. Name and address information will be redacted. First Name* Last Name* Email Address* Address 1 City State -- Select a State v ZIP Second portion of ZIP Code is optional. Age 0-18 V Race / Ethnicity White/Caucasian V Rent or Own Rent

Own

COVID-19 Questions

Answer the following questions for funding of COVID activities from CARES Act money, and are not part of the ongoing CDBG grant program.

How has the COVID-19 pandemic affected you?

□ Job Loss □ Unable to pay rent □ Unable to pay mortgage □ Unable to pay for groceries □ Business slowdown □ None of the above

The City has additional dollars that could be spent for a program to respond to COVID-19. What type do you think is most needed in the City?

- O COVID-19 testing for front line workers
- O COVID-19 testing for teachers and students
- O COVID-19 testing for anyone who thinks they have been exposed
- O Contact tracing efforts
- O Food pantries
- O Rental Assistance to prevent evictions
- O Mortgage Assistance to prevent foreclosures
- O Utility Assistance
- O Small business assistance for locally owned businesses
- None of these. I will add a suggestion in the comments box

General CDBG Questions

The following programs are part of the annual CDBG Grant funding.

Which type of project would you like to see Greenwood invest more dollars?

- O Updating sidewalks to be ADA accessible
- O Updating park facilities to be ADA accessible
- O Adding more fields, courts and/and play equipment to parks
- O Adding more sidewalks/pedestrian paths to make sure neighborhoods are walkable
- None of these. I will add a suggestion in the comments box.

What type of housing assistance is most needed in Greenwood?

- O Rent or mortgage assistance
- O Down payment assistance for new home buyers
- O Renovating older homes for new home buyers
- O Helping homeowners with much needed repairs
- None of these. I will add a suggestion in the comments box.

Would you like to be added to the CDBG email list?

□ Yes, I am interested in hearing about CDBG plans & public meetings □ Not at this time

Comments

Cancel Submit>>

Survey – Items to Note:

- o Received 60 responses
- o All responses came from people who identified as White/Caucasian
- o 9 responses came from those who rented their home
- o COVID 19 Impact
 - o 35 respondents said COVID-19 did not have an impact on their household
 - o 19 respondents said they had a business slowdown
 - o 3 had job loss
 - 5 said they were unable to pay rent, unable to pay mortgage or unable to pay for groceries
- How should City respond to COVID?
 - o 7 said should help food pantries
 - o 15 said rental assistance
 - 3 said mortgage assistance
 - o 15 said small business assistance
 - 13 said contact tracing, testing for front line workers/teachers/students or people who have been exposed
- o Types of public facility improvements
 - o 37 said more pedestrian walkways sidewalks to make walkable neighborhoods
 - 8 said updating park facilities
- Types of housing assistance
 - o 20 said rental or mortgage assistance
 - o 13 said renovating old homes for new homebuyers
 - o 13 said helping homeowners with needed repairs

City of Greenwood Virtual Public Meeting 10-15-20 5:30 PM

After a brief presentation, participants were asked a few questions about the needs in the community. The discussion was general and open with a few of the comments from the public to be:

- The City of Greenwood needs to continue to prevent evictions in the time of COVID-19.
- It's more than COVID1-19, the City has a lack of affordable housing. Stakeholders mentioned being unable to find an apartment that rents less than \$1000 per month or a house that costs in the area of \$100,000.
- The Community needs a variety of housing at a variety of prices so everyone who wants to live in Greenwood can do so.
- Access to transportation is a need. A few of the community members did not know about public transportation available in the County. Even that transportation has its limits and does not assist individuals going to 2nd or 3rd shift jobs.
- There is a need for daily living needs, such as car repairs for when the limited transportation cannot get a family member to work or a child/student to school.
- The community needs a "place" where people seeking help can find help in Greenwood. The fact most providers are located in Franklin is a barrier for those seeking help or for public officials to know where to send people looking for help.
- The community needs more higher paying jobs and affordable housing, must be a twoprong approach.
- Childcare is a need for the community both quality and affordable. Although, in the pandemic, it seems that some child care spots are still going unfilled with Girls Inc and Boys and Girls Club in Franklin. A similar model in Greenwood is needed.

Aspire Meeting – October 28, 2020 3:30 PM Topic: Affordable Housing

Panel: Brad Coffing (MIBOR), Erin Slevin (Bridges Alliance), Lee Ann Wilbur (Habitat for Humanity), and Andrew Bradley (Prosperity Indiana)

Moderator: Jennifer Hollingshead

Approximately 14 people attended.

Had 40 minutes of panelists addressing questions regarding affordable housing.

- What is affordable housing?
 - Affordable means less than 30% of a household income (Habitat)
 - Attainable means for low income households, that they can find housing that is affordable and available
- ALICE Asset Limited Income Constrained
- Does Johnson County have housing for its workforce?
 - Can people who support the amenities liv in the community? If no, then those amenities will decrease.
 - Housing is not attainable now because it will flip fast.
- Prosperity Indiana Housing 4 Hoosiers is a guide for renters
- Have seen log jams for various products at various price points in Johnson County.
- Housing narrative.org provides narrative and answers in talking with NIMBY help rally around housing needs
- SDDA districts one person asked if the community would take advantage of those but have not heard much on these Did a google search of these and did not find any designated for 2020 in Johnson County, Indiana.

Had a 20-minute breakout by community. No stakeholders joined the Greenwood section.

DAILY JOURNAL, JOHNSON COUNTY, IND.

CALL CLASSIFIEDS / 736-2700

WEDNESDAY, FEBRUARY 10, 2021 **B**5



CITY OF GREENWOOD <u>PUBLICATION OF THE PROGRAM YEAR 2020 CDBG ACTION PLAN</u> <u>SUBSTANTIAL AMENDMENT TO THE PROGRAM YEAR 2019 CDBG ACTION</u> <u>PLAN</u>

The City of Greenwood, for the second year will receive an allocation (\$358,841) of Community Development Block Grant (CDBG) funding. The U.S. Department of Housing and Urban Development (HUD) has consolidated the planning, application, and reporting requirements for CDBG. The statute for this grant program sets forth three basic goals: provide decent housing, provide a suitable living environment and expand economic opportunities. To receive these funds, the City of Greenwood must allocate the funding to projects through its 2020 Action Plan.

In response to the COVID-19 Pandemic, the City of Greenwood has received an allocation of \$515,699 of CDBG funding, of which \$389,699 remains to be allocated to specific projects. This funding must meet the same basic goals as the traditional CDBG program.

The CARES Act allows the City of Greenwood to apply for waivers to certain statutory requirements to implement a response more quickly. The City of Greenwood will utilize waivers to allow for virtual meetings and for a shortened public comment for Consolidated Plan and Annual Action Plan amendments. This shortened period will be a minimum of five (5) days and will enable the City to expedite funding programs that meet community needs as a result of the COVID-19 pandemic.

The draft copies of these plans will be available on the City of Greenwood website at <u>https://www.greenwood.in.gov/cdbg</u> and hard copies will be available upon request to the Mayor's Office beginning February 25, 2021.

PUBLIC MEETING

The City of Greenwood will host a virtual meeting at Noon on February 25, 2021 to summarize the plan and receive input from the community. Members of the community may attend via zoom at https://zoom.us/j/98845341601? pwd=Q05xK0xBQkM5MGxJTWw2MVBKV1gvdz09

Meeting ID: 988 4534 1601

Passcode: 1234

Dial in: 312 626 6799 US

Citizens are encouraged to review the draft plans and submit comments to the City of Greenwood, Federal Grant Administrator, 300 South Madison Avenue, Greenwood, Indiana, 46142, by March 4, 2021.

Further information about these plans is available from Kevin Steinmetz, City of Greenwood, 300 South Madison Avenue, Greenwood, Indiana, 46142, 317-887-5000, <u>steinmek@greenwood.in.gov.</u>

The City of Greenwood does not discriminate on the basis of race, color, age, sex, sexual orientation, gender identity, disability, national origin, religion, income status, veteran status, limited English proficiency or any other protected classification under federal law and provides. upon request, reasonable accommodation to afford an

ML

individual with a disability an equal opportunity to participate in all services, programs and activities.

Please submit all questions or comments to: 2020 CDBG | Comment or Question

CDBG Contacts:

KEVIN STEINMETZ Office of the Mayor Capital Projects Manager

MOLLY LAUT Office of the Mayor Strategic Marketing & Community Relations Appendix B 424 Forms

OMB Number: 4040-0004 Expiration Date: 12/31/2022

Application for	Federal Assistance SF-424	
* 1. Type of Submis		
* 3. Date Received: 03/04/2021	4. Applicant Identifier:	
5a. Federal Entity lo	entifier: 5b. Federal Award Identifier:	
State Use Only:		
6. Date Received by	State: 7. State Application Identifier:	
8. APPLICANT INF	ORMATION:	
* a. Legal Name:	City of Greenwood	7
* b. Employer/Taxpa 35-6001050	yer Identification Number (EIN/TIN): * c. Organizational DUNS: 0000830504887	
d. Address:		
* Street1: Street2: * City: County/Parish: * State: Province: * Country: * Zip / Postal Code:	Greenwood City Center 300 South Madison Street Greenwood In: Indiana USA: UNITED STATES 46142-3151	
e. Organizational	Jnit:	
Department Name: Mayor's Office	Division Name:	
f. Name and conta	ct information of person to be contacted on matters involving this application:	
Prefix: Mr Middle Name: * Last Name: St Suffix:	* First Name: Kevin]
Title: Capital P	rojects Manager	
Organizational Affilia	tion:	
* Telephone Numbe	Fax Number:	
* Email: steinme	k@greenwood.in.gov	

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	Select Applicant Type:	
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10. Name of Federal Ag	gency:	
Department of Hous	ing and Urban Development	
11. Catalog of Federal D	omestic Assistance Number:	
14.218		
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rs. Competition identific		
Title:		
14. Areas Affected by Pr	roject (Cities, Counties, States, etc.):	_
	Add Attachment Delete Attachment View Attachment	
15. Descriptive Title of	Applicant's Project:	
The City of Greenw	ood will assist low to moderate income households with affordable housing c infrastructure improvements and social services outlined in the FY 2020 Action	
Attach supporting documer	nts as specified in agency instructions.	
Add Attachments	Delete Attachments View Attachments	

16. Congressional Districts	Of:			
* a. Applicant IN08			* b. Program/Project IN	10.8
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17. Proposed Project: * a. Start Date: 10/01/202	-		the Fred Dates for	100 10001
	0		* b. End Date: 09	9/30/2021
18. Estimated Funding (\$):				
* a. Federal	358,841.00			
* b. Applicant	0.00			
* c. State	0.00			
* d. Local	0.00			
* e. Other	0.00			
* f. Program Income	0.00			
* g. TOTAL	358,841.00			
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ASSURANCES - CONSTRUCTION PROGRAMS

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:

- 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.
- 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.
- Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
- 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.

- Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) 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).
- 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.
- Will comply with all Federal statutes relating to non-10 discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) 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. 92-255), 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. 91-616), 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. §§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. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statue(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statue(s) which may apply to the application.

Previous Edition Usable

Authorized for Local Reproduction

Standard Form 424D (Rev. 7-97) 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.
- Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
- 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. 91-190) 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 11988; (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 176(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).

- 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.
- 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. §§469a-1 et seq).
- 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 106(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	
What we make	Mayor	
APPLICANT ORGANIZATION	DATE SUBMITTED	
City of Greenwood	03/04/2021	

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Appendix C Certifications

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.

Uniform Relocation Act and 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, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant 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 Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701u) and implementing regulations at 24 CFR Part 135.

Marker Myn Signature of Authorized Official

2/22/2021 Data

Specific Community Development Block Grant 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 plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan 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 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 CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having 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 (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) ______ [a period specified by the grantee 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.

<u>3. Special Assessments.</u> 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.

In addition, 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 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 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 of Authorized Official

<u>2/22/2021</u> Date

Mayor Title

OPTIONAL Community Development Block Grant Certification

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 particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBGassisted activities which are designed to meet other community development needs having 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.

<u>2/22/20</u>21 Date

<u>Mark w. Myn</u> Signature of Authorized Official <u>Mayor</u> Title