



City of Greenwood

CDBG Program Year 2024

Consolidated Annual Performance Evaluation Report

Draft for review December 13-27, 2025

The Consolidated Annual Performance and Evaluation Report (CAPER) for Greenwood's Community Development Block Grant (CDBG) program is available for public review and comment from December 13 - 27, 2025 at www.greenwood.in.gov/cdbg and at the Greenwood Public Library.

The CAPER provides an overview of CDBG spending and accomplishments for Program Year 2024 ending September 30, 2025. Greenwood will include all public comments in the final submission to the US Department of Housing and Urban Development on December 29, 2025.

Greenwood residents and other interested parties may submit public comments to CDBG@greenwood.in.gov, City of Greenwood, Attn: CDBG Comments, 300 S Madison Ave, 46142. Comments must include the name and address of the person submitting the comment and be received by 4:30PM on December 27, 2025.

For CAPER access accommodations, contact Kevin Steinmetz at the City of Greenwood, 317-887-5000 or steinmek@greenwood.in.gov three business days before the public comment period ends. An Equal Opportunity Office.

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CR-05 - Goals and Outcomes

Progress the jurisdiction has made in carrying out its strategic plan and its action plan. 91.520(a)
This could be an overview that includes major initiatives and highlights that were proposed and executed throughout the program year.

In Program Year (PY) 2024, Greenwood completed an activity from the previous consolidated plan by assisting 20 novel residents aged 62+ or 18+ with a disability with subsidized transportation across the county. This public service activity began in PY 2023 but required Technical Assistance (TA) to organize outreach and document beneficiary eligibility. This activity assisted 55 residents in total across PYs 2023 and 2024. It is, by far, the most effective of Greenwood's public service activities. Riders report they previously could not afford this bus service and now have access to grocery stores and doctors' offices they can afford on a fixed income.

Greenwood started construction on the parking lot at Northeast Park. This PY 2022 activity was delayed due to a watershed study and an eight-step decision-making process for floodplain management to meet the requirements of 24 CFR 55.20. Greenwood initially scheduled construction to be complete by the end of PY 2024, but the contractor, Dave O'Mara, needed coaching to regain compliance with federal labor standards. Greenwood provided significant TA to O'Mara to regain compliance with federal labor requirements, and construction is 80% complete as of December 2025. Beneficiary and Section 3 reporting on this project will happen in the PY 2025 CAPER.

Greenwood's CDBG consultant spent PY 2024 seeking a housing provider willing to make repairs to low- to moderate-income houses, setting the program up for a housing accomplishment in PY 2025.

Finally, Greenwood funded emergency rent and utility payments for six low- to moderate-income households in two activities, and job and skills training for two low- to moderate-income residents. Due to issues with expenditures, these three public service subrecipients will not be funded in future PYs unless they demonstrate to Greenwood that their administrative systems have improved significantly

Comparison of the proposed versus actual outcomes for each outcome measure submitted with the consolidated plan and explain, if applicable, why progress was not made toward meeting goals and objectives. 91.520(g)

Categories, priority levels, funding sources and amounts, outcomes/objectives, goal outcome indicators, units of measure, targets, actual outcomes/outputs, and percentage completed for each of the grantee's program year goals.

Greenwood prioritized funding subrecipients that provide emergency financial assistance to prevent homelessness, based on Consolidated Plan feedback. The city funded two subrecipients in PY 2024 that assisted six low- to moderate-income households: two households were assisted in a late-starting PY 2023 activity, and four households were assisted in a PY 2024 activity.

Subrecipients also provided job training and skill-building to two beneficiaries in a PY 2024 activity and subsidized local transportation costs for 20 disabled and elderly residents in a PY 2023 activity.

Greenwood's consultants, City Consultants & Research, LLC, provided extensive TA to each subrecipient, providing feedback and training on income qualifications and reimbursement submissions. Despite the TA, three subrecipients were unable to document CDBG eligibility without hours of assistance from Greenwood staff. As part of its timeliness workout plan, Greenwood made the difficult decision to stop funding these three organizations.

At the start of PY 2024, Greenwood had no potential subrecipients to assist in providing housing that is affordable to all residents, one of the highest-priority needs identified in the Consolidated Plan. City Consultants met with groups working in the county and secured a subrecipient to provide housing for PY 2025.

Greenwood also struggled to meet its goal for the public facility activity, which is not a priority for residents, but a necessary activity to meet the expenditure deadline. City staff moved the PY 2024 public facility activity from Woodmen to Northeast Park. This activity is currently awaiting State Historical Preservation Office review and approval, and should have documented beneficiaries in PY 2025 to meet the next expenditure deadline.

Assess how the jurisdiction's use of funds, particularly CDBG, addresses the priorities and specific objectives identified in the plan, giving special attention to the highest priority activities identified.

Greenwood identified three goals in the PY 2024 Consolidated Plan, excluding administration: Expand and improve affordable housing options, support residents to become self-sustaining, and improve quality of life.

Greenwood funded two of the three non-administration goals in PY 2024; there were

no affordable housing providers who were willing to accept CDBG funding for PY 2024. Since this goal is the highest priority identified by residents, staff spent time locating a subrecipient for funding in PY 2025, and the consultants are working with the provider to set up the necessary administrative systems.

CR-10 - Racial and Ethnic composition of families assisted

Describe the families assisted (including the racial and ethnic status of families assisted). 91.520(a)

| | CDBG |
|---|------|
| White | 24 |
| Black or African American | 2 |
| Asian | 1 |
| American Indian or American Native | 0 |
| Native Hawaiian or Other Pacific Islander | 0 |
| | |
| Total | 27 |
| | |
| Hispanic | 0 |
| Not Hispanic | 27 |

Table 1 – Table of assistance to racial and ethnic populations by source of funds

Narrative

The chart above does not list individuals identifying as more than one race. Below is a more complete chart that lists all those served in PY 2024.

| | Total |
|---|-------|
| White | 24 |
| Black or African American | 2 |
| Asian | 1 |
| American Indian or Alaskan Native | 0 |
| Native Hawaiian or Other Pacific Islander | 0 |
| African American/Black & White | 0 |
| Asian & White | 1 |
| American Indian/Alaskan Native & White | 0 |
| American Indian/Alaskan Native & Black/African American | 0 |
| Other Multi-Racial | 0 |
| Total | 28 |
| Hispanic | 0 |
| Not Hispanic | 28 |

CR-15 - Resources and Investments 91.520(a)

Identify the resources made available

| Source of Funds | Source | Resources Made Available | Amount Expended During Program Year |
|-----------------|------------------|--------------------------|-------------------------------------|
| CDBG | public - federal | 295,084 | 363,605.14 |

Table 2 - Resources Made Available

Narrative

Greenwood was finally able to spend some PY 2022 funding on long-delayed parking lot improvements at Northeast Park, increasing the amount expended in the PY above what was made available.

Identify the geographic distribution and location of investments

| Target Area | Planned Percentage of Allocation | Actual Percentage of Allocation | Narrative Description |
|-----------------------|----------------------------------|---------------------------------|-----------------------|
| City Wide Initiatives | 34 | 100 | |
| Low Mod Census Tracts | 66 | 0 | |

Table 3 - Identify the geographic distribution and location of investments

Narrative

Greenwood CDBG allocated no PY 2024 funds in IDIS to census tracts in PY 2024. The change in location for the PY 2024 public facility activity, plus Greenwood not yet having an infrastructure activity subject to BABA, delayed the start of the Environmental Review. Greenwood still plans to allocate funds to low- to moderate-income census tracts but does not establish public facility activities in IDIS until after the Requested Release of Funds is approved.

Leveraging

Explain how federal funds leveraged additional resources (private, state and local funds), including a description of how matching requirements were satisfied, as well as how any publicly owned land or property located within the jurisdiction that were used to address the needs identified in the plan.

Greenwood does not require a match for funding but does encourage its subrecipients to supplement their CDBG funding with other sources. Greenwood's consultants will provide TA for subrecipients to more accurately document matching funding from all sources in PY 2025.

Greenwood used publicly owned land for the PY 2022 Northeast Park activity, providing additional, accessible parking and stormwater retention, slated for completion in PY 2025.

CR-20 - Affordable Housing 91.520(b)

Evaluation of the jurisdiction's progress in providing affordable housing, including the number and types of families served, the number of extremely low-income, low-income, moderate-income, and middle-income persons served.

| | One-Year Goal | Actual |
|--|---------------|--------|
| Number of Homeless households to be provided affordable housing units | 0 | 0 |
| Number of Non-Homeless households to be provided affordable housing units | 0 | 0 |
| Number of Special-Needs households to be provided affordable housing units | 0 | 0 |
| Total | 0 | 0 |

Table 4 – Number of Households

| | One-Year Goal | Actual |
|--|---------------|--------|
| Number of households supported through Rental Assistance | 11 | 6 |
| Number of households supported through The Production of New Units | 0 | 0 |
| Number of households supported through Rehab of Existing Units | 0 | 0 |
| Number of households supported through Acquisition of Existing Units | 0 | 0 |
| Total | 11 | 6 |

Table 5 – Number of Households Supported

Discuss the difference between goals and outcomes and problems encountered in meeting these goals.

Greenwood had two subrecipients provide rental assistance to prevent homelessness in PY 2024. One of the subrecipients, United Way of Johnson County, previously served as a subrecipient in this capacity with CBDG-CV funding, meeting all goals of its previous contracts. After signing the contract and undergoing subrecipient training, United Way was unwilling to collect the information required under Part 5 for income qualification. Greenwood undertook progressive sanctions: it requested updated information multiple times, offered additional training, and asked United Way to return its remaining PY 2023 and 2024 funding to avoid repayment to HUD for unqualified beneficiaries.

The other subrecipient, The Salvation Army, did not meet its listed goals for

expenditure and number of beneficiaries. During monitoring, Greenwood determined that their lack of administrative systems and internal controls makes them too high-risk to fund in the future.

Discuss how these outcomes will impact future annual action plans.

Greenwood introduced a more robust application process for PY 2025 that severely reduced the likelihood of unwittingly funding subrecipients with minimal administrative systems. Greenwood consultants determined that, without a dedicated staff person at the city, it is inadvisable to increase administrative capacity at more than one subrecipient within two years. This restriction will continue in future action plans.

Include the number of extremely low-income, low-income, and moderate-income persons served by each activity where information on income by family size is required to determine the eligibility of the activity.

| Number of Households Served | CDBG Actual |
|-----------------------------|-------------|
| Extremely Low-income | 0 |
| Low-income | 2 |
| Moderate-income | 4 |
| Total | 6 |

Table 6 – Number of Households Served

Narrative Information

As mentioned in the goals and outcomes portion, the subrecipients providing the rent assistance underperformed in the number of beneficiaries they assisted. Once Greenwood establishes its owner-occupied repair program, it will return its focus to finding a subrecipient for rental assistance.

CR-25 - Homeless and Other Special Needs 91.220(d, e); 91.320(d, e); 91.520(c)

Evaluate the jurisdiction's progress in meeting its specific objectives for reducing and ending homelessness through:

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

Greenwood, as part of Johnson County, is in Region 11 of Indiana's Continuum of Care (CoC), along with seven other counties. The CoC council has bimestrial meetings at

Human Services, Inc. in Bartholomew County. The group has taken an active role in the Point-in-Time (PIT) Count and is working with a formerly unhoused individual to facilitate outreach with other unhoused and housing-insecure community members. The CoC is strengthening the homeless service network, improving the assessment of the homeless community and its needs, and encouraging more providers to use HMIS data-tracking and Coordinated Entry systems.

Addressing the emergency shelter and transitional housing needs of homeless persons

Greenwood and surrounding Johnson County do not have any crisis shelters or emergency beds. Households seeking crisis housing often rely on shelters in neighboring communities, like Indianapolis, and on funding availability for short-term motel stays.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: likely to become homeless after 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); and, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Human Services, Inc., in Bartholomew County, is the only CoC-funded Rapid Re-Housing program in Region 11. Services for people experiencing homelessness are found in other communities with greater perceived need and more accurate PIT count numbers.

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

Greenwood does not have a service provider for individuals experiencing homelessness within its jurisdiction.

CR-30 - Public Housing 91.220(h); 91.320(j)

Actions taken to address the needs of public housing

Greenwood does not have a locally based public housing or housing choice voucher provider. 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. Greenwood has no public housing units or multifamily housing owned by a public housing agency. Households with housing choice vouchers must locate rental properties that accept vouchers in Greenwood without assistance from the city.

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

Greenwood asks public service subrecipients to make affordable housing information available at CDBG-funded services. Realistically, minimal affordable housing is available in Greenwood so little information is available.

Actions taken to provide assistance to troubled PHAs

N/A

CR-35 - Other Actions 91.220(j)-(k); 91.320(i)-(j)

Actions taken 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. 91.220 (j); 91.320 (i)

Barriers to affordable housing may come from anywhere. Local and state zoning and building regulations are the most recognized barriers; increased regulation begets increased construction costs to meet all regulations. Greenwood's 2024 Analysis of Impediments to Fair Housing found additional impediments:

- Housing problems are localized in low-to-moderate-income areas.
- Census tracts with concentrations of minorities have increased rates of denials.
- Housing choice is affected by lack of affordable housing in Greenwood and adversely affects protected classes.
- Fair housing laws and reporting options are not effectively communicated to Greenwood residents
- Institutional and regional coordination of enforcement and advocacy needs to improve.

Greenwood's CDBG consultant assisted in developing the Comprehensive Plan during PY 2023 and served on the steering committee to provide a voice for affordable housing, fair housing, and community development.

Actions taken to address obstacles to meeting underserved needs. 91.220(k); 91.320(j)

Greenwood's primary obstacle to serving underserved needs in the community is that many programs are based outside Greenwood and lack the capacity to handle the administrative burden of federal funds.

Greenwood funds Gateway Services' Access Johnson County to provide fixed-route and on-demand transportation for seniors and disabled adults, increasing access to medical providers, grocery stores, and other amenities that many have to travel to within the largely pedestrian-unfriendly county.

Actions taken to reduce lead-based paint hazards. 91.220(k); 91.320(j)

Greenwood did not carry out any activities in PY 2024 that would disturb lead paint. If

any activities were funded, all existing units would be screened for lead-based paint, if applicable, following federal requirements.

Actions taken to reduce the number of poverty-level families. 91.220(k); 91.320(j)

Greenwood funded Bridges of Johnson County Circles program, providing job and basic living skills to two low- to moderate-income residents. Circles seeks to provide tools to help beneficiaries elevate themselves out of poverty and reach at least 200% of the Federal Poverty Guidelines.

Actions taken to develop institutional structure. 91.220(k); 91.320(j)

Greenwood used its Administration funding to update Policies and Procedures and the CDBG application to assist subrecipients in capacity-building to support vulnerable residents. Greenwood committed ten or more hours per month to each Public Service subrecipient in PY 2024 to ensure they understood the requirements and had systems in place to maintain accurate records and assist during staff turnover.

Actions taken to enhance coordination between public and private housing and social service agencies. 91.220(k); 91.320(j)

United Way of Johnson County is the primary connection for service providers throughout the county through quarterly meetings. Greenwood CDBG had a representative attend meetings to support coordination among providers.

Identify actions taken to overcome the effects of any impediments identified in the jurisdictions analysis of impediments to fair housing choice. 91.520(a)

Greenwood CDBG staff prioritized increasing knowledge on fair housing topics, devoting 15 hours to Fair Housing Center of Central Indiana trainings and attending the Fair Housing Conference. The CDBG team also made fair housing training materials available to local elected officials.

CR-40 - Monitoring 91.220 and 91.230

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

Due to staff turnover at the City of Greenwood, CDBG staff took a novel approach to monitoring for PY 2024. Despite substantial TA throughout the current and previous PYs, when evaluating the highest-risk subrecipients for monitoring, Greenwood determined that many lacked the capacity or desire to regain compliance with federal requirements.

Greenwood's consultants ensured that any amounts currently claimed for reimbursement had adequate eligibility documentation and recommended that two subrecipients, United Way and Greenwood Education Foundation, return funding. Greenwood also determined that they would deny future funding requests from The Salvation Army due to a lack of attention to detail in documenting income.

Greenwood engages in ongoing review of activity compliance in addition to annual monitoring; CDBG consultants thoroughly review reimbursement claims before Greenwood staff processes them, and administrative requirements are outlined in annual subrecipient trainings and follow progressive sanctions for subrecipients.

For PY 2025, Greenwood began requiring all CDBG subrecipients with awards of \$9,000 or more to provide evidence of an independent or single financial audit to decrease the likelihood of financial errors.

Citizen Participation Plan 91.105(d); 91.115(d)

Describe the efforts to provide citizens with reasonable notice and an opportunity to comment on performance reports.

The PY 2024 CAPER was available for a 15-day comment period from December 13-27, 2025. Greenwood published a notice in the local paper on December 12, 2025, and made the CAPER available at the Greenwood Public Library, on the city's website, and in hard copy upon request. There were ### comments during this period.

CR-45 - CDBG 91.520(c)

Specify the nature of, and reasons for, any changes in the jurisdiction's program objectives and indications of how the jurisdiction would change its programs as a result of its experiences.

Greenwood anticipates how it addresses supportive services or improvements to public facilities will remain the same. Over the five years of the Consolidated Plan, the city expanded its partnerships to provide services in the community. The primary challenge has been to find an affordable housing provider.

Does this Jurisdiction have any open Brownfields Economic Development Initiative (BEDI) grants?
No.

[BEDI grantees] Describe accomplishments and program outcomes during the last year.
N/A

CR-58 - Section 3

Identify the number of individuals assisted and the types of assistance provided

| Total Labor Hours | CDBG |
|---------------------------------------|------|
| Total Number of Activities | 0 |
| Total Labor Hours | 0 |
| Total Section 3 Worker Hours | 0 |
| Total Targeted Section 3 Worker Hours | 0 |

Table 7 – Total Labor Hours

| Qualitative Efforts - Number of Activities by Program | CDBG |
|---|------|
| Outreach efforts to generate job applicants who are Public Housing Targeted Workers | 0 |
| Outreach efforts to generate job applicants who are Other Funding Targeted Workers. | 0 |
| Direct, on-the job training (including apprenticeships). | 0 |
| Indirect training such as arranging for, contracting for, or paying tuition for, off-site training. | 0 |
| Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching). | 0 |
| Outreach efforts to identify and secure bids from Section 3 business concerns. | 0 |
| Technical assistance to help Section 3 business concerns understand and bid on contracts. | 0 |
| Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns. | 0 |
| Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services. | 0 |
| Held one or more job fairs. | 0 |
| Provided or connected residents with supportive services that can provide direct services or referrals. | 0 |
| Provided or connected residents with supportive services that provide one or more of the following: work readiness health screenings, interview clothing, uniforms, test fees, transportation. | 0 |
| Assisted residents with finding child care. | 0 |
| Assisted residents to apply for, or attend community college or a four year educational institution. | 0 |
| Assisted residents to apply for, or attend vocational/technical training. | 0 |
| Assisted residents to obtain financial literacy training and/or coaching. | 0 |

| | |
|--|---|
| Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns. | 0 |
| Provided or connected residents with training on computer use or online technologies. | 0 |
| Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses. | 0 |
| Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act. | 0 |
| Other. | 0 |

Table 8 – Qualitative Efforts - Number of Activities by Program

Narrative

There were no Section 3 activities with beneficiaries reported in PY 2024.