

Program Year 2023

Consolidated Annual Performance and Evaluation Report (CAPER)

2601 Greenbush St, Lafayette IN 47904

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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.

The U.S. Department of Housing and Urban Development (HUD) awards various funding resources to Entitlement Communities across the United States. HUD bases awards on formula calculations, including the community's population, pre-1940 housing stock, growth, and decline. The City of Lafayette received \$643,145 for the Community Development Block Grant (CDBG), and \$941,538 in HOME Investment Partnership (HOME) for the 2023 Program Year (PY) from July 1, 2023, to June 30, 2024. This Consolidated Annual Performance and Evaluation Report (CAPER), or year-end report, discusses Lafayette's accomplishments in PY 2023.

During FY 2023, the City spent \$306,412.27 in CDBG, \$207,917.78 in HOME, and \$31,719.19 in CDBG-CV funding. As the COVID-19 pandemic became endemic, the City focused on programs that could efficiently spend funds to meet the FY 2026 deadline.

The Lafayette Housing Consortium, unincorporated regions of Tippecanoe County, and the communities of Battle Ground, Lafayette, and West Lafayette jointly allocate HOME funds. The City of Lafayette is the lead agency in the Consortium. It administers HOME funds throughout Tippecanoe County, while Lafayette Housing Authority (LHA) ensures the Consortium and City of Lafayette achieve the Consolidated Plan's objectives.

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.

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.

In the PY 2023 Action Plan, the City of Lafayette focused CDBG resources on increasing access to food, necessary repairs to help residents age in place, and providing shelter and services to unhoused residents. The City spent \$306,412.27 of CDBG, \$31,719.19 of CDBG-CV, and \$207,917.78 of HOME in PY 2023. One activity was awarded in PY 2021, and work was completed in PY 2023. Four activities were awarded in PY 2022, and work was completed in PY 2023. Of the 16 CDBG activities underway in some capacity in PY 2023, nine were current-year. Of the nine activities awarded in PY 2023, five were completed within the same year awarded.

The CDBG activities awarded in PY 2023 that moved forward include:

1. Lafayette Housing Authority incurred administration costs totaling \$116,423.60. LHA used a portion of these funds to pay a consultant to assist with program oversight, including document submission and reports to HUD, to help comply with HUD regulations.
2. The City of Lafayette incurred administration costs totaling \$2,452.07.
3. Lafayette spent \$34,205.97 for homeowner repair services. While the activity is still open, they assisted eight households in PY 2023.
4. Big Brothers Big Sisters of Greater Lafayette used \$7,500 to mentor two juvenile residents.
5. Lafayette Urban Ministry used \$20,000 to provide 347 residents with emergency shelter.
6. LTHC Homeless Services used \$34,970.84 to assist 1246 residents with homelessness-related services.
7. Meals on Wheels used \$20,000 to increase food accessibility for 232 residents.
8. YWCA of Greater Lafayette used \$8,207.24 to provide domestic violence services to 50 households.

The City completed one activity from PY 2021 and four activities from PY 2022 CDBG in PY 2023.

Because of the COVID-19 pandemic, HUD awarded a special allocation of CDBG CARES Act funding called CDBG-CV. The City completed two CV project(s) in PY 2023, including:

- Meals on Wheels used \$10,133.35 in PY 2023 to assist 13 Lafayette households reported in PY 2020.
- Lafayette Urban Ministry used \$15,448.79 to install external lockers, benefitting 347 residents in PY2023.

In PY 2023, the City used \$119,891 in HOME funds to provide Tenant-Based Rental Assistance, and new homeowner unit construction with down payment assistance. Lafayette will continue to assist low- and moderate- income households in PY 2024.

The City experienced difficulties with several of its activities:

- The Lafayette Housing Authority Grant Administrator position remained vacant for most of the program year. The position was filled in July 2024 and will utilize additional Admin funding in PY2024.
- CDBG-funded public service subrecipients did not meet their projected beneficiary goals for the program year. One agency declined to continue with CDBG funding in PY 2024 due to the difficulty their staff experienced obtaining qualifying documentation from their participants. Several agencies experienced staff turnover during the year.
- Two Parks project completions were delayed by expanding the scope of improvements to use the balance of funding available and are estimated to complete in PY 2024.

- Ramp and sidewalk projects were delayed due to constraints on contractor availability and other projects taking priority for the Engineering Department.
- Streetlight projects were delayed so that Tribal notifications of ground-disturbing activity could be processed before installation.

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 | HOME |
|---|-------------|----------|
| White | 1344 | 5 |
| Black or African American | 432 | 2 |
| Asian | 8 | 0 |
| American Indian or American Native | 9 | 0 |
| Native Hawaiian or Other Pacific Islander | 5 | 0 |
| Total | 1798 | 7 |
| Hispanic | 29 | 0 |
| Not Hispanic | 1769 | 7 |

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

Narrative

Above is a chart that lists all those served in PY 2023 by the City of Lafayette and its subrecipients by funding resource, it does not list those individuals and households identifying as multi-racial or of more than one race; please see that information in the image below.

| | CDBG | CDBG CV | HOME |
|---|------|---------|------|
| White | 1344 | 239 | 5 |
| Black or African American | 432 | 107 | 2 |
| Asian | 8 | 1 | 0 |
| American Indian or American Native | 9 | 0 | 0 |
| Native Hawaiian or Other Pacific Islander | 5 | 0 | 0 |
| African American/Black & White | 1 | 0 | 0 |
| Asian & White | 0 | 0 | 0 |
| American Indian/Alaskan Native & White | 2 | 0 | 0 |
| American Indian/Alaskan Native & Black/African American | 0 | 0 | 0 |
| Other/Multi-Racial | 76 | 0 | 1 |
| Total | 1877 | 347 | 8 |
| Hispanic | 30 | 10 | 0 |
| Not Hispanic | 1847 | 337 | 8 |

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 | 675,199 | \$306,412.27 |
| HOME | public - federal | 1,278,912 | \$207,917.78 |

Table 2 - Resources Made Available

Narrative

Lafayette used CDBG, HOME, and CDBG-CV funds for activities that met priorities from the Consolidated Plan and the PY 2023 Action Plan. The City utilized funds targeted to meet the greatest needs, and expenditures were directly related to programs that supported the City's Consolidated Plan.

The City of Lafayette expended \$306,412.27 of CDBG entitlement, \$207,917.78 of HOME, and \$31,719.19 of CDBG-CV funding in PY 2023.

The City has \$119,504.54 in CDBG-CV funds left to draw. This amount includes unused funds of \$29,046.43 admin and \$552.11 from completed activities. These funds are expected to be added to the final CDBG-CV project with a plan amendment in PY 2024.

The remaining project is Public Infrastructure to improve handicap ramps at intersections in Tecumseh neighborhood which will utilize the balance of CDBG-CV funds increasing accessibility of the neighborhood allowing for safe, socially-distanced, outdoor pedestrian activity of the residents to increase resiliency to mitigate future coronavirus outbreaks or health events.

Identify the geographic distribution and location of investments

| Target Area | Planned Percentage of Allocation | Actual Percentage of Allocation | Narrative Description |
|--------------------------|----------------------------------|---------------------------------|-----------------------|
| City-Wide | 36 | 31.89 | |
| Low Income Census Tracts | 31 | 7.25 | |
| Tippecanoe County | 33 | 59.86 | Regional Area |

Table 3 – Identify the geographic distribution and location of investments

Narrative

Lafayette uses its CDBG funding on city-wide public service activities and on public facilities and infrastructure in targeted, low-income areas. The Lafayette Housing Consortium, through the City of Lafayette and LHA, uses HOME funding county-wide in the unincorporated areas of Tippecanoe County, Battle Ground, West Lafayette, and Lafayette.

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.

The City of Lafayette did not utilize publicly owned land or property in PY 2023 activities.

HUD granted Lafayette a 50% match reduction based on the poverty criterion for HOME. The City's percentage of residents in poverty must be at least 16.44% to qualify; Lafayette's percentage of poverty is 18.97% based on data obtained from the *American Community Survey 2016-2020 Five-Year Estimates from Census*, the latest data available at the time of determination.

Two HOME activities, 1510 and 1511, contributed \$36,180 in PY 2023 match. CDBG does not require matching funds, but due to the limited funding available, CDBG activities utilized \$1,379,224 in private, \$54,937 in state, \$0 in local funding, and \$1,579,646 in other non-Lafayette federal funding.

| Fiscal Year Summary – HOME Match | |
|--|---------|
| 1. Excess match from prior Federal fiscal year | 5386015 |
| 2. Match contributed during current Federal fiscal year | 36180 |
| 3. Total match available for current Federal fiscal year (Line 1 plus Line 2) | 5422195 |
| 4. Match liability for current Federal fiscal year | 16892 |
| 5. Excess match carried over to next Federal fiscal year (Line 3 minus Line 4) | 5405303 |

Table 4 – Fiscal Year Summary - HOME Match Report

| Match Contribution for the Federal Fiscal Year | | | | | | | | |
|--|----------------------|----------------------------|-------------------------------|------------------------------|-------------------------|---|----------------|-------------|
| Project No. or Other ID | Date of Contribution | Cash (non-Federal sources) | Foregone Taxes, Fees, Charges | Appraised Land/Real Property | Required Infrastructure | Site Preparation, Construction Materials, Donated labor | Bond Financing | Total Match |
| 1510 | 5/16/2023 | 0 | 0 | 0 | 0 | 16840 | 0 | 16840 |
| 1511 | 9/30/2023 | 0 | 0 | 0 | 0 | 19340 | 0 | 19340 |

Table 5 – Match Contribution for the Federal Fiscal Year

HOME MBE/WBE report

| Program Income – Enter the program amounts for the reporting period | | | | |
|---|---|---|--------------------------------|--|
| Balance on hand at begin-ning of reporting period \$ | Amount received during reporting period \$ | Total amount expended during reporting period \$ | Amount expended for TBRA \$ | Balance on hand at end of reporting period \$ |
| 8116 | 1990 | 8312 | 32052 | 1794 |

Table 6 – Program Income

| Minority Business Enterprises and Women Business Enterprises – Indicate the number and dollar value of contracts for HOME projects completed during the reporting period | | | | | | |
|---|-------|-----------------------------------|---------------------------|--------------------|----------|--------------------|
| | Total | Minority Business Enterprises | | | | White Non-Hispanic |
| | | Alaskan Native or American Indian | Asian or Pacific Islander | Black Non-Hispanic | Hispanic | |
| Contracts | | | | | | |
| Number | 2 | | | | | 2 |
| Dollar Amount | 95000 | | | | | 95000 |
| Sub-Contracts | | | | | | |
| Number | 15 | | | 2 | 2 | 11 |
| Dollar Amount | 55237 | | | 6200 | 5688 | 43349 |
| | Total | Women Business Enterprises | Male | | | |
| Contracts | | | | | | |
| Number | 2 | | 2 | | | |
| Dollar Amount | 95000 | | 95000 | | | |
| Sub-Contracts | | | | | | |
| Number | 15 | | 15 | | | |
| Dollar Amount | 55237 | | 55237 | | | |

Table 7 - Minority Business and Women Business Enterprises

| Minority Owners of Rental Property – Indicate the number of HOME assisted rental property owners and the total amount of HOME funds in these rental properties assisted | | | | | | |
|--|-------|-----------------------------------|---------------------------|--------------------|----------|--------------------|
| | Total | Minority Property Owners | | | | White Non-Hispanic |
| | | Alaskan Native or American Indian | Asian or Pacific Islander | Black Non-Hispanic | Hispanic | |
| Number | | | | | | |
| Dollar Amount | | | | | | |

Table 8 – Minority Owners of Rental Property

| Relocation and Real Property Acquisition – Indicate the number of persons displaced, the cost of relocation payments, the number of parcels acquired, and the cost of acquisition | | | | | | |
|--|-------|-----------------------------------|---------------------------|--------------------|----------|--------------------|
| Parcels Acquired | | | | | | |
| Businesses Displaced | | | | | | |
| Nonprofit Organizations Displaced | | | | | | |
| Households Temporarily Relocated, not Displaced | | | | | | |
| Households Displaced | Total | Minority Property Enterprises | | | | White Non-Hispanic |
| | | Alaskan Native or American Indian | Asian or Pacific Islander | Black Non-Hispanic | Hispanic | |
| Number | | | | | | |
| Cost | | | | | | |

Table 9 – Relocation and Real Property Acquisition

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 | 6 | 6 |
| Number of Non-Homeless households to be provided affordable housing units | 33 | 10 |
| Number of Special-Needs households to be provided affordable housing units | 0 | 0 |
| Total | 39 | 16 |

Table 10 – Number of Households

| | One-Year Goal | Actual |
|--|---------------|-----------|
| Number of households supported through Rental Assistance | 6 | 6 |
| Number of households supported through The Production of New Units | 20 | 2 |
| Number of households supported through Rehab of Existing Units | 13 | 8 |
| Number of households supported through Acquisition of Existing Units | 0 | 0 |
| Total | 39 | 16 |

Table 11 – Number of Households Supported

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

The City did not meet its goal for the production of new housing units due to a number of factors, including HOME limits on the loan-to-value ratio. The high cost of Lafayette housing is influenced by the proximity of the University and other builders in the area, driving prices above maximum value after rehab or construction. Local CHDOs have expressed reluctance to continue to use HOME funding due to this limitation. Lafayette will continue to work with CPD and local agencies to explore ways to address this issue.

A CHDO requested the cancellation of an activity requiring the return of \$56,500 of PY2021 HOME funds

to the treasury account reporting that the property's Fair Market Value exceeded the Homeownership Sales Price Limit. The agency determined a sale would not result in a sustainable purchase for a low- to moderate- income household.

To help meet its new construction goals Lafayette has two new construction projects underway. Snowy Owl Commons (PY 2023 activity 1528) will produce 50 accessible rental units; 45 are reserved for those 55+, and five are reserved for those 62+; all units will go to low- to moderate- income residents. The Jeffersonian (PY 2023 activity 1536) will produce 50 units of housing for 55+ and utilizes eight Project Based Vouchers. This project will utilize HOME funds from PY2020, PY2022, and PY2023.

The City was under its rehabilitation goal by five units due to the subrecipient agencies lack of capacity, limited options of available and affordable properties, and limited contractors willing to work on federally funded projects.

Discuss how these outcomes will impact future annual action plans.

Lafayette only accomplished 16% of its PY 2022 AP housing goals; this is due to the time it takes to complete housing activities – many construction activities take longer than one program year to complete. The City will review the metric used to predict the number of units so it aligns with what is physically possible in a program year.

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 | HOME Actual |
|-----------------------------|-------------|-------------|
| Extremely Low-income | 1 | 6 |
| Low-income | 4 | 2 |
| Moderate-income | 3 | 0 |
| Total | 8 | 8 |

Table 12 – Number of Households Served

Narrative Information

In PY 2023, the City used \$34,205.97 of CDBG to fund eight repairs to low- and moderate-income households and \$ 119,891 in HOME to create two new homeownership opportunities and provide rental assistance for six units throughout the city increasing housing stock and assisting in preventing homelessness. Two HOME-assisted properties meet the Section 215 definition of affordable housing.

HUD defines worst-case needs as renter households with low incomes (incomes at or below 50% AMI) who do not receive government housing assistance, pay more than one-half of their income for rent, live in severely inadequate conditions, or both. To address worst-case needs, Lafayette funded Fresh Start TBRA HOME activities in PY 2022 that continued on into PY 2023. These activities assist survivors of intimate partner violence transition into stable housing. To assist seniors with low-cost housing needs, an affordable rental property is underway: Snowy Owl Commons (PY 2023 activity 1528) will produce 50 accessible rental units; 45 are reserved for those 55+, and five are reserved for those 62+; all units will go to low- to moderate- income residents. The Jeffersonian, a new construction rental property,

received Low Income Housing Tax Credits in 2023 and will be starting construction in PY2024. This project has been planned for over three years and will use HOME funding from 2020, 2021, and 2023 to create 50 new accessible rental units for seniors. These two rental projects will increase affordable housing in Lafayette by 100 units and utilize \$1,000,000 of HOME funding. The projects are expected to be completed in late PY 2025.

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

The City used \$74,970.84 in CDBG to fund YWCA, LTHC Homeless Services, and Lafayette Urban Ministry activities serving unhoused residents. These providers collaborate on outreach to the unhoused by participation in the Homeless Prevention Intervention Network of North Central Indiana (HPIN), the Indiana Balance of State Continuum of Care (BoS CoC) regional planning agency for Region 4. The City's Homeless Liaison office moved to the Lafayette Police Department and added a staff member to better coordinate services and outreach to homeless individuals.

Addressing the emergency shelter and transitional housing needs of homeless persons

Lafayette's emergency shelters provided temporary housing to 1643 residents. LTHC Homeless Services provides temporary overnight shelter, meals, and showers, assisting 1246 residents in PY 2023. YWCA Domestic Violence Intervention and Prevention Program offered temporary housing for 50 survivors of intimate partner violence. Lafayette Urban Ministry provided temporary shelter for 347 residents.

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

The City of Lafayette funds many homelessness programs with its CDBG funding. Other programs, to prevent homelessness, are funded by other resources. The City partners with LHA and the Indiana Department of Child Services to provide Housing Choice Vouchers (HCV) for residents aging out of foster care through Foster Youth to Independence (FYI), a waitlist preference that fill a gap for those who do not obtain other voucher types. The initiative makes voucher assistance available to residents 18 to 24 years old who left or will leave foster care within 90 days or residents 16 or older who are homeless or are at risk of becoming homeless.

Similar to FYI vouchers, LHA administers Family Unification Program (FUP) family vouchers, providing housing assistance to low-income families who lack adequate housing and face the imminent placement in, or the delayed discharge of, children in out-of-home care.

Tippecanoe County service provider Valley Oaks offers Bridges to Community Living. This hybrid program provides supervised group residences and teaches skills for independent living for residents

discharged from state hospitals who have a high risk of being re-hospitalized, risk of being unhoused, or who have frequent interactions with the judicial system. Valley Oaks also offers Gatekeeper Transitional Services which is a program to assist clients transitioning into or out of institutional settings, including state hospitals. Our Gatekeeper helps clients and their families navigate the complex mental health system, connects them to relevant resources, and ensures a safe transition back into the community.

The Tippecanoe County Veterans Treatment Court (VTC) assists Veterans who find it difficult to assimilate into civilian life after returning from service. and find it difficult to transition back into civilian life. VTC diverts eligible Veterans from traditional courts and offers a court-supervised treatment program as an alternative to jail time and term of probation.

The Tippecanoe County Corrections Home Detention program attempts to utilize evidence-based practices including case management, to assist individuals involved in the judicial system. Additional support is needed for those who cannot afford home detention or who may not qualify for Home Detention to prevent previously incarcerated individuals from being unhoused upon release.

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

LHA staff participate in the Homeless Prevention Intervention Network of North Central Indiana (HPIN), the Indiana Balance of State Continuum of Care (BoS CoC) regional planning agency for Region 4. HPIN's strategy to provide rent and utility assistance to residents at-risk of coincides with CDBG-funded YWCA's DVIPP Fresh Start activity. LTHC Homeless Services offers the Veteran Services Program (VSP) specifically designed to provide housing resources to help low-income Veteran families achieve housing stability and increase access to services.

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

Actions taken to address the needs of public housing

LHA administers a number of housing voucher programs, including:

The HCV program, assisting households at or below 50% AMI, managing 1,440 HCV, HUD-VASH, Emergency Housing Vouchers, Stability Vouchers, Project Based Vouchers, Mainstream Vouchers, Tenant Protection Vouchers, and Homeownership Vouchers with a rental subsidy of approximately \$7,644,803. There are 1,988 residents on the waitlist.

43 Veterans Affairs Supportive Housing Vouchers (VASH), designed to end Veteran homelessness, to LHA. VASH supports Veterans with rental assistance and Veterans Affairs social workers to assist in maintaining housing.

137 Mainstream vouchers focused on finding long-term housing solutions for residents with disabilities who are not considered elderly, transitioning out of institutional settings, rapid rehousing, or other emergency temporary housing. Funding and financial reporting for Mainstream vouchers is separate from tenant-based vouchers. LHA subsidizes one Homeownership voucher.

33 Emergency Housing Vouchers (EHV) through the American Rescue Plan Act (ARPA). EHV provides HCV to households who are homeless, at risk of homelessness, survivors of intimate partner violence, sexual assault, stalking, and human trafficking.

Five Stability Vouchers (SV) make HCV assistance available to Public Housing Agencies (PHAs) in partnership with local Continuum of Care and Victim Service Providers who assist households experiencing or at risk of homelessness, survivors of intimate partner violence, sexual assault, stalking, human trafficking, and households that include a veteran that meets one of the criteria.

59 project-based vouchers (PBV) to LTHC Homeless Services to provide around-the-clock case management for the chronically homeless to eliminate barriers for individuals (48) and families (11). LHA has 3 HAP contracts with LTHC Homeless Services housing and case management for program participants. After 12 months, participants are referred to LHA for non-PBV.

LHA serves residents 62+ with 24 PVB at the Friendship House, a housing and services facility.

The HOME TBRA Fresh Start activities from PY 2022 work in the same manner as the HCV program. Fresh Start specifically assists women exiting the Domestic Violence Intervention and Prevention Program (DVIPP) in Lafayette who are at risk of homelessness as survivors of intimate partner violence.

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

LHA does not own or manage any public housing units but administers HUD HCV, a basic rental assistance program. The LHA Board of Commissioners includes a participant commissioner who provides input on decision-making in the best interest of the program and participants who are free to choose

housing that meets the program's requirements.

LHA is not accepting new families into its homeownership program but subsidizes one household in the homeownership program. Capacity and cost burden are barriers that hinder increasing homeownership program participants.

Actions taken to provide assistance to troubled PHAs

The Section 8 Management Assessment Program (SEMAP) consistently rates LHA as a high-performing housing authority.

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)

HUD recognizes a few universal barriers to affordable housing like local and state regulations on zoning and building. Increased regulation increases the cost of building housing that meets all regulations. The 2020 Analysis of Impediments to Fair Housing did not find any types of local zoning, such as limits on vinyl siding or the appearance of housing and its design, that impose limits on housing.

While there may not be any regulatory barriers, the institutional structure used in affordable housing development may create organizational and other non-regulatory barriers. Local leaders and stakeholders suggest that the land and property acquisition cost of affordable housing development has increased so much that, even with CDBG and HOME funding allocations, providers cannot develop large numbers of affordable housing without substantial funding sources such as Low Income Housing Tax Credits. Lafayette will research best practices for affordable housing development in high-price markets to ensure future CDBG and HOME allocations are utilized.

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

The City is committed to addressing social problems that can lead to poverty and homelessness. Intimate partner violence contributes to poverty and is a leading cause of women's and children's homelessness. In PY 2023, CDBG supported the YWCA DVIPP, which provided beds, information, referrals, and legal services to 50 Lafayette residents.

LHA addresses Veteran homelessness through VASH vouchers and a Veteran and youth preference within the HCV program.

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

The City follows HUD rules for lead-based paint hazards when utilizing CDBG and HOME for housing renovation. Properties with more than \$5,000 of federal funds invested must follow the rules for Lead Paint reduction, and agencies must use interim controls and pass a lead paint hazard inspection and clearance upon completion of renovations on pre-1978 homes.

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

Lafayette, in partnership with the City of West Lafayette and the network of social service and housing providers in the community, promotes economic empowerment by supporting facilities, services, and activities aimed at developing self-sufficiency for all low- to moderate-income residents and will continue to work with local agencies to identify barriers and issues related to poverty and support programs that will help low to moderate-income households overcome those barriers to help

households stay out of poverty or become self-sufficient and elevate themselves from poverty.

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

LTHC Homeless Services's Engagement Center includes Permanent Supportive Housing (PSH) and a location for the Coordinated Entry System (CES) to place qualified residents as beds are available, using a vulnerability and needs assessment tool. The PSH units opened in November 2019, and the remainder of the Engagement Center opened in January 2020. LTHC Homeless Services served 1,246 residents experiencing or at risk of homelessness.

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

Traditional redevelopment has been led by small, non-profit community development organizations at the grassroots level. Smaller organizations cannot build large-scale projects or be holistic, limiting their impact on the target population. Some ideas to overcome these barriers and enhance coordination between public and private housing and social agencies 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 households, connecting services and rental assistance with new developments
- Enlist all levels of city government to be supportive of the development of additional affordable housing

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

An Analysis of Impediments for 2020 – 2025 was approved on May 4, 2020 and did not find any types of zoning that impose limits on housing, such as limits on vinyl siding or the appearance of housing and its design. The study found that Tippecanoe County has the following Impediments to Fair Housing:

- Concentrations of non-White populations
- Disproportionate housing needs for non-White and the elderly
- Disparities in access to community assets such as transportation and high-performance schools
- High demand for accessibility in public and affordable housing
- Low attained educational level among the general population related to fair housing.

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

Monitoring verifies that federal funds recipients comply with local objectives and federal program requirements. Lafayette works cooperatively with contractors and subrecipients via an ongoing monitoring process, providing technical assistance when needed.

- Funding requests are supported with an application review for national objectives, eligibility, and allocation recommendations. Applications include specific information regarding design, cost, and beneficiaries. Activities must be consistent with local goals and objectives as expressed in the Annual Action Plan and comply with related program regulations. A funding agreement outlining all of the requirements, regulations, and standards is required, and agreements for all real property activities specify the acceptable use of the property, the length of the restrictive period, and disposition requirements.
- On-site monitoring is conducted as the City deems necessary and reasonable; desk reviews and off-site monitoring are ongoing.
- Claims for payment are submitted with appropriate documentation to the program manager for review and payment approval.
- Subrecipients are required to submit quarterly, monthly, or annual reports on activity status and beneficiary compliance.
- Lafayette addresses compliance concerns as soon as the program manager knows of an issue with an activity. The City provides technical assistance to help maintain or regain compliance.
- Subrecipient activities are conducted by the program manager annually, using a checklist of areas for review, followed by written documentation of the level of compliance detailing methods and timeframes for regaining compliance.
- Subrecipients may be required to file a Certified Public Accountant's annual report of financial stability and federally funded project expenditures. Records are maintained for five years after project closeout, after final payments, and all related matters are closed.
- Enforcement of non-compliant activities follows 2 CFR 200.338 with the right of appeal, as well as termination of a contract.

Lafayette encourages the use of minority- (MBE), women- (WBE), and veteran- (VBE) owned businesses for each of its activities, and contracts include language encouraging the use of these businesses. Staff work closely with the individual communities and subrecipients to help procure the solicitation of MBE, WBE, and VBE contractors.

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.

Lafayette released the PY 2023 CAPER for public comment from September 9 – 23, 2024.

The City received ## comments during that period. Comments are available in the Public Notices and Comments attachment.

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.

Lafayette does not anticipate any changes to the program's objectives or goals in the next year.

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-50 - HOME 24 CFR 91.520(d)

Include the results of on-site inspections of affordable rental housing assisted under the program to determine compliance with housing codes and other applicable regulations

Please list those projects that should have been inspected on-site this program year based upon the schedule in 24 CFR §92.504(d). Indicate which of these were inspected and a summary of issues that were detected during the inspection. For those that were not inspected, please indicate the reason and how you will remedy the situation.

| IDIS | Address | Units | Date of Inspection | Pass / Fail | Failed Items |
|------|-----------------------|-------------------|--------------------|---|--|
| 1058 | 3627 Champlain | 1 unit | 4/26/24 | Pass | |
| 1058 | 3638 Champlain | 1 unit | 8/30/23 | Pass | |
| 1058 | 1317 Wensleydale | 1 unit | 5/28/24 | Pass | |
| 1058 | 3605 Greenbush | 1 unit | 12/27/23 | Pass | |
| 1058 | 3637 Greenbush | 1 unit | 2/6/24 | Pass | |
| 1058 | 1406 Shenandoah | 1 unit | 3/13/24 | Fail - Items reported complete by Manager | Unit passed on 3/29/23, 11/14/23, 2/29/24 in response to tenant complaints. 3/13/24 fail due to loose toilet bolts. |
| 1315 | 3791 Winston Dr - 101 | 1 unit | 12/6/23 | Fail - Items reported complete by Manager | exterior door weatherstripping missing one side |
| 1315 | 3791 Winston Dr - 104 | 1 unit | 12/6/23 | Fail - Items reported complete by Manager | window lock broken, smoke detector battery needed replaced |
| 1315 | 3791 Winston Dr - 201 | 1 unit | 12/6/23 | Fail - Items reported complete by Manager | exterior door weatherstripping missing one side |
| 1315 | 3791 Winston Dr - 204 | 1 unit | 12/6/23 | Pass | |
| 684 | 206-A Railroad | 1 unit | 12/14/23 | Fail | no smoke detector in basement, front door lock weak |
| 684 | 206-B Railroad | 1 unit | 12/14/23 | Pass | |
| 864 | 3983 Druze | 4 unit group home | 11/27/23 | Fail - Items reported complete by Manager | stove burner broken, 1 wall outlet broken, exterior GFIC outlet inoperable & cover missing, exterior exhaust vent cover broken |
| 865 | 3949 Electra | 4 unit group home | 11/27/23 | Fail - Items reported complete by Manager | refrigerator door gasket damaged |
| 866 | 3964 Abraham | 4 unit group home | 11/27/23 | Fail - Items reported complete by Manager | Rear deck ramp hanger deteriorated |
| 909 | 2307 Central | 2 units | 11/27/23 | Fail - Items reported complete by Manager | 1 outlet with open ground, lavatory drain stopper missing, |
| 926 | 744 S 26th | 1 unit | 10/27/23 | Fail - Items reported complete by Manager | 2 bathroom windows didn't stay open, 1 missing screen, GFIC didn't work, exterior fence loose |
| 1194 | 20 N 27th | 3 unit group home | 11/16/23 | Pass | |
| 1195 | 24 N 27th | 3 unit group home | 11/16/23 | Pass | |
| 1196 | 302 N 25th | 3 unit group home | 11/16/23 | Fail - passed on reinspection | broken switch in bathroom, lavatory drain stopper missing |
| 1264 | 1408 S 19th | 3 unit group home | 11/27/23 | Pass | |
| 1325 | 1607 N 15th | 3 unit group home | 11/16/23 | Inconclusive - reported complete by Manager | Kitchen floor repair underway |
| 1338 | 52 W 250 S | 4 unit group home | 11/27/23 | Pass | |

Lafayette inspected 46 units on 19 properties in PY 2023; 20 units passed and 26 failed initial inspection. Inspection information is available in the attached table.

Provide an assessment of the jurisdiction's affirmative marketing actions for HOME units. 24 CFR 91.520(e) and 24 CFR 92.351(a)

The City's affirmative marketing policy is attached to all HOME agreements and non-discrimination clauses and the Equal Housing logo used in public notices

Refer to IDIS reports to describe the amount and use of program income for projects, including the number of projects and owner and tenant characteristics

The City drew \$8,115.37 of HOME PI for three HOME activities in PY 2023.

Activity 1504 Fresh Start TBRA used \$3,947 to assist an extremely low-income survivor of intimate partner violence and her two children in renting a three-bedroom apartment.

Activity 1508 Fresh Start TBRA used \$3,547 to assist an extremely low- income survivor of intimate partner violence and her child in renting a two-bedroom apartment.

Activity 1528 Snowy Owl Commons used \$621.37 assist in developing 50 units of low- to moderate-income housing for residents 55 and older.

Describe other actions taken to foster and maintain affordable housing. 24 CFR 91.220(k) (STATES ONLY: Including the coordination of LIHTC with the development of affordable housing). 24 CFR 91.320(j)

Lafayette undertook the following efforts to address impediments to fair housing and increase local understanding of fair housing options:

- Attended FHCCI FH90 Accessing Housing Data
- Participated in FHCCI 12th Annual Fair Housing Conference
- Participated in Purdue Spring Housing Fair by distributing materials
- Participated in ICRC Fair Housing Panel
- Participated in Fairfield Township Resource Fair by distributing materials
- Participated in Glasswater Health & Information Fair by distributing materials

CR-58 – Section 3

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

| Total Labor Hours | CDBG | HOME | ESG | HOPWA | HTF |
|------------------------------|-------------|-------------|------------|--------------|------------|
| Total Number of Activities | 0 | 0 | 0 | 0 | 0 |
| Total Labor Hours | | | | | |
| Total Section 3 Worker Hours | | | | | |

| | | | | | |
|---------------------------------------|--|--|--|--|--|
| Total Targeted Section 3 Worker Hours | | | | | |
|---------------------------------------|--|--|--|--|--|

Table 13 – Total Labor Hours

| Qualitative Efforts - Number of Activities by Program | CDBG | HOME | ESG | HOPWA | HTF |
|---|-------------|-------------|------------|--------------|------------|
| Outreach efforts to generate job applicants who are Public Housing Targeted Workers | | | | | |
| Outreach efforts to generate job applicants who are Other Funding Targeted Workers. | | | | | |
| Direct, on-the job training (including apprenticeships). | | | | | |
| Indirect training such as arranging for, contracting for, or paying tuition for, off-site training. | | | | | |
| Technical assistance to help Section 3 workers compete for jobs (e.g., resume assistance, coaching). | | | | | |
| Outreach efforts to identify and secure bids from Section 3 business concerns. | | | | | |
| Technical assistance to help Section 3 business concerns understand and bid on contracts. | | | | | |
| Division of contracts into smaller jobs to facilitate participation by Section 3 business concerns. | | | | | |
| Provided or connected residents with assistance in seeking employment including: drafting resumes, preparing for interviews, finding job opportunities, connecting residents to job placement services. | | | | | |
| Held one or more job fairs. | | | | | |
| Provided or connected residents with supportive services that can provide direct services or referrals. | | | | | |
| 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. | | | | | |
| Assisted residents with finding child care. | | | | | |
| Assisted residents to apply for, or attend community college or a four year educational institution. | | | | | |
| Assisted residents to apply for, or attend vocational/technical training. | | | | | |
| Assisted residents to obtain financial literacy training and/or coaching. | | | | | |
| Bonding assistance, guaranties, or other efforts to support viable bids from Section 3 business concerns. | | | | | |
| Provided or connected residents with training on computer use or online technologies. | | | | | |
| Promoting the use of a business registry designed to create opportunities for disadvantaged and small businesses. | | | | | |
| Outreach, engagement, or referrals with the state one-stop system, as designed in Section 121(e)(2) of the Workforce Innovation and Opportunity Act. | | | | | |
| Other. | | | | | |

Table 14 – Qualitative Efforts - Number of Activities by Program

Narrative

There were no Section 3 projects completed in PY 2023.