

# CDBG

## Annual Action Plan 2023



Fourth Program Year: **2023**

Prepared for:

Final: June 20, 2023



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## Executive Summary

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

### 1. Introduction

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

CDBG funding may be used in the following areas:

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

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

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

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

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

#### Objectives:

#### (1) Decent Affordable Housing

Rehabilitation of single- and multi-unit housing, direct homeownership assistance to single family homebuyers, and energy conservation for affordable housing to meet the objective of decent, affordable housing.

## **(2) Suitable Living Environment**

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

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

### **Outcomes:**

#### **(1) Availability/Accessibility**

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

#### **(2) Affordability**

Rehabilitation of single- and multi-unit housing, direct homeownership assistance for single family homebuyers, and energy conservation for affordable housing with outcomes of affordable housing services and availability of quality, affordable housing units for low- and moderate-income Goshen households.

#### **(3) Sustainability**

Rehabilitation of single- and multi-unit housing, direct homeownership assistance for single family homebuyers, and energy conservation for affordable housing with the outcome of promoting a livable, sustainable community, including the creation and preservation of affordable housing.

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

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

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

## **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

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

Invitations to all public hearings/meetings are sent to a broad contact list, including local public housing and service agencies, Warsaw Housing Authority, institutions such as Goshen Health, Goshen Community Schools, Goshen College, Oaklawn, and Greencroft Goshen, City staff, City Council members and local media. As required by Goshen's citizen participation plan, two public hearings were held. The first was held to review the current five-year plan and program year 2022, to solicit input and set priorities for the 2023 annual action plan and 2023 program year activities. The second public hearing was held to review the draft 2023 annual action plan. The draft plan was posted on the City website with a link for feedback. Notice of the availability of the draft plans was also emailed to the CDBG contact list and the local Continuum of Care (Indiana Region 2 Homeless Coalition).

**Input for the 2023 Annual Action Plan was obtained through the following:**

- Public hearing for current plan review and input for upcoming plan, January 20, 2023
- Invitation to Continuum of Care requesting input on 2023 Annual Action Plan and submittal timeline, February 23, 2023
- Public comment period for draft 2023 Annual Action Plan, March 14, 2023, through April 12, 2023
- Public hearing to receive input on draft 2023 Annual Action Plan and current plan review, March 20, 2023
- Public meeting to authorize submittal of 2023 Annual Action Plan, April 17, 2023

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

**5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

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

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

All comments were accepted.

**7. Summary**

Public input was solicited and encouraged utilizing a variety of methods.

*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
CDBG Administrator	Goshen	Planning Office

Table 1 – Responsible Agencies

**Narrative (optional)**

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

**Consolidated Plan Public Contact Information**

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

### **1. Introduction**

The 2023 Annual Action Plan reflects a coordinated effort with public and private housing, health and social service agencies. The City of Goshen Redevelopment Department conducted a citywide housing market analysis, published in May of 2022, to gather information on housing availability and affordability, housing conditions, and future housing development priorities. Current demand estimates indicated the Goshen housing market was underserved. Looking at current and projected demand, it was estimated that the local market needs approximately 4,537 new housing units, which is a 33% increase, through 2030 (2,466 rental and 2,071 owner-occupied). It was also noted that there was a need for more low/mod affordable housing units that could only be built with government subsidies to keep expenses lower and meet that demand. Information from the analysis is being used to identify general strategies to address housing needs and future developments.

The City's CDBG staff participates and serves on the executive committee of the Region 2 Continuum of Care, a group of agencies and organizations interested in homelessness who meet bi-monthly to share data and information on homelessness, facilitate dialogue among service providers, and coordinate community resources and services for the benefit of individuals and families who are homeless or in imminent danger of becoming homeless, thereby reducing homelessness.

Information about all public hearings and opportunity for input was provided to a large contact list, which includes public and private housing, health and social service agencies, published in the local newspaper and posted on the City's website.

### **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(l))**

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

A public hearing with 9 participants, representing seven local agencies, was held on January 20, 2023, to review the current program year and to discuss needs, priorities and activities for the 2023 annual action plan.

The draft 2023 annual action plan was distributed to the Continuum of Care and to the broad CDBG contact list on March 13, 2023.

A second public hearing was held March 20, 2023, as part of a regular Goshen Common Council meeting, to provide opportunity for input for the draft 2023 annual plan, and to review program year 2022. Those in attendance at the public hearing were Mayor Stutsman, the Deputy Mayor, seven Council members, six City of Goshen department heads and staff, members of the media and approximately ten (10) community members. During the public hearing, there were no comments received.

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

The Indiana Region 2 Homeless Coalition (IR2HC), the local Continuum of Care, was notified during a meeting on February 23, 2023, of the 2023 Annual Action Plan completion timeline. A copy of the draft plan and notice of the public comment period and upcoming public hearing was provided to the Coalition via email on March 13, 2023.

The IR2HC is a group of public and private agencies interested in homelessness who meet bi-monthly to coordinate community resources and discuss services to address and prevent homelessness in Elkhart County and Region 2, with the aim of reducing homelessness.

The City's CDBG staff participates and serves on the executive committee of the Region 2 Continuum of Care.

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

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards 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**

The City does not receive or allocate ESG funds, but the draft 2023 annual action plan was distributed to the Region 2 Continuum of Care for review and comment. The City's CDBG staff serves on the executive committee of the Region 2 Continuum of Care.



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

Table 2 – Agencies, groups, organizations who participated

1	<b>Agency/Group/Organization</b>	<b>BOYS AND GIRLS CLUB OF GREATER GOSHEN, INC.</b>
	<b>Agency/Group/Organization Type</b>	Services-Children
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 20, 2023, public hearing, participated in the sub-recipient meeting, and is a current public service grant sub-recipient.
2	<b>Agency/Group/Organization</b>	<b>CENTER FOR HEALING AND HOPE</b>
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and was a former public service grant sub-recipient.
3	<b>Agency/Group/Organization</b>	<b>GOSHEN INTERFAITH HOSPITALITY NETWORK</b>
	<b>Agency/Group/Organization Type</b>	Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy Public service needs assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, is a member of the Region 2 Continuum of Care, received materials presented at the January 20, 2023, public hearing and subrecipient meeting and is a current public service grant sub-recipient.
4	<b>Agency/Group/Organization</b>	<b>MAPLE CITY HEALTH CARE CENTER, INC.</b>
	<b>Agency/Group/Organization Type</b>	Services-Health
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 20, 2023, public hearing and in the sub-recipient meeting, and is a current public service grant sub-recipient.

5	<b>Agency/Group/Organization</b>	<b>LACASA OF GOSHEN, INC</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, was a partner in the countywide housing needs assessment, implements the housing rehabilitation portion of the City's CDBG program, assists in CDBG program planning through neighborhood outreach, is a designated CBDO, is a member of the Region 2 Continuum of Care, participated in the January 20, 2023, public hearing and in the sub-recipient meeting, and provided input through direct contact.
6	<b>Agency/Group/Organization</b>	<b>WALNUT HILL EARLY CHILDHOOD EDUCATION CENTER</b>
	<b>Agency/Group/Organization Type</b>	Services-Children Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 20, 2023, public hearing and in the sub-recipient meeting, and is a current public service grant sub-recipient.
7	<b>Agency/Group/Organization</b>	<b>Salvation Army Goshen</b>
	<b>Agency/Group/Organization Type</b>	Public Service Agency
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Public service needs assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
8	<b>Agency/Group/Organization</b>	<b>Goshen Engineering Department</b>
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Public facilities & improvements

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and participates in the planning and implementation of public facilities & improvements projects.
9	<b>Agency/Group/Organization</b>	<b>Council on Aging</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs Public service needs assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 20, 2023, public hearing and in the sub-recipient meeting, and is a current public service grant sub-recipient.
10	<b>Agency/Group/Organization</b>	<b>YWCA OF NORTH CENTRAL INDIANA</b>
	<b>Agency/Group/Organization Type</b>	Services-Victims of Domestic Violence
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
11	<b>Agency/Group/Organization</b>	<b>Real Services, Inc./</b>
	<b>Agency/Group/Organization Type</b>	Services-Elderly Persons Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
12	<b>Agency/Group/Organization</b>	<b>ADEC</b>
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
13	<b>Agency/Group/Organization</b>	<b>AIDS MINISTRIES AIDS ASSIST</b>
	<b>Agency/Group/Organization Type</b>	Housing Services-Persons with HIV/AIDS
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
14	<b>Agency/Group/Organization</b>	<b>Elkhart County Clubhouse</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the January 20, 2023, public hearing and in the sub-recipient meeting, and is a current public service grant sub-recipient.
15	<b>Agency/Group/Organization</b>	<b>EMERGE MINISTRIES</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and a member of the Region 2 Continuum of Care.
16	<b>Agency/Group/Organization</b>	<b>GOODWILL OF MICHIANA</b>
	<b>Agency/Group/Organization Type</b>	Services-Persons with Disabilities Services-Employment Regional organization
	<b>What section of the Plan was addressed by Consultation?</b>	Non-Homeless Special Needs

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and a member of the Region 2 Continuum of Care.
17	<b>Agency/Group/Organization</b>	<b>OAKLAWN PSYCHIATRIC CENTER, INC.</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-Persons with Disabilities Services-homeless
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and a member of the Region 2 Continuum of Care, and provides permanent supportive housing.
18	<b>Agency/Group/Organization</b>	<b>VA Northern Indiana</b>
	<b>Agency/Group/Organization Type</b>	Services - Housing Services-homeless Services-Health Health Agency Other government - Federal
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Chronically homeless Homelessness Needs - Veterans Homelessness Strategy Non-Homeless Special Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and a member of the Region 2 Continuum of Care.
19	<b>Agency/Group/Organization</b>	<b>Warsaw Housing Authority</b>
	<b>Agency/Group/Organization Type</b>	PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, a member of the Region 2 Continuum of Care, and is consulted via staff contacts.

20	<b>Agency/Group/Organization</b>	<b>HABITAT FOR HUMANITY OF ELKHART COUNTY</b>
	<b>Agency/Group/Organization Type</b>	Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, is a member of the Region 2 Continuum of Care, and participated in the countywide housing needs assessment.
21	<b>Agency/Group/Organization</b>	<b>Goshen Building Department</b>
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Department provides input related to housing needs.
22	<b>Agency/Group/Organization</b>	<b>Goshen Community Relations Commission</b>
	<b>Agency/Group/Organization Type</b>	Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Fair Housing & Equal Opportunity
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and the activities of the Commission are an integral part of furthering the goals of CDBG.
23	<b>Agency/Group/Organization</b>	<b>Goshen Community Schools</b>
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Homeless Needs - Families with children Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
24	<b>Agency/Group/Organization</b>	<b>Goshen Mayor's Office</b>
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homelessness Strategy Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, participated in the public hearing on March 20, 2023, and provides overall guidance for the CDBG program.
25	<b>Agency/Group/Organization</b>	<b>Goshen Police Department</b>
	<b>Agency/Group/Organization Type</b>	Other government - Local Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Homelessness Strategy Neighborhood Activities
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list, is a member of the Region 2 Continuum of Care, and provides liaison officers for each neighborhood association.
26	<b>Agency/Group/Organization</b>	<b>Goshen Health</b>
	<b>Agency/Group/Organization Type</b>	Health Agency Major Employer
	<b>What section of the Plan was addressed by Consultation?</b>	Public service needs assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
27	<b>Agency/Group/Organization</b>	<b>Greencroft Goshen</b>
	<b>Agency/Group/Organization Type</b>	Housing Services-Elderly Persons
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is consulted regarding housing needs for the elderly.
28	<b>Agency/Group/Organization</b>	<b>MACOG</b>
	<b>Agency/Group/Organization Type</b>	Regional organization Planning organization



	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development Transportation
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and the CDBG administrator participates in the agency's transit advisory committee.
29	<b>Agency/Group/Organization</b>	<b>Goshen Ministerial Association</b>
	<b>Agency/Group/Organization Type</b>	Religious Leaders
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list.
30	<b>Agency/Group/Organization</b>	<b>Goshen Common Council</b>
	<b>Agency/Group/Organization Type</b>	Other government - Local Elected officials
	<b>What section of the Plan was addressed by Consultation?</b>	Overall plan review
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	All Goshen Common Council members are on the email distribution list. One public hearing and one public meeting are held during regular Council meetings. Council members are invited to all neighborhood CDBG meetings.
31	<b>Agency/Group/Organization</b>	<b>Chamberlain Neighborhood Association</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood Association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
32	<b>Agency/Group/Organization</b>	<b>College Farm Neighborhood Association</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
33	<b>Agency/Group/Organization</b>	<b>East Goshen Neighborhood Association</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
34	<b>Agency/Group/Organization</b>	<b>East Lincoln Crossroads Neighborhood Association</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
35	<b>Agency/Group/Organization</b>	<b>Goshen College</b>
	<b>Agency/Group/Organization Type</b>	Services-Education
	<b>What section of the Plan was addressed by Consultation?</b>	Education & public service needs
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and participated in the public hearing on January 20, 2023.
36	<b>Agency/Group/Organization</b>	<b>Historic Dickerson Landing Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Meetings are held with neighborhood associations in preparation for all public facilities and improvement projects.
37	<b>Agency/Group/Organization</b>	<b>Historic Racemere Peninsula Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
38	<b>Agency/Group/Organization</b>	<b>Historic Southside Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
39	<b>Agency/Group/Organization</b>	<b>Maplecrest Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
40	<b>Agency/Group/Organization</b>	<b>Northside Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
41	<b>Agency/Group/Organization</b>	<b>Parkside Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
42	<b>Agency/Group/Organization</b>	<b>Pickwick Village Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
43	<b>Agency/Group/Organization</b>	<b>Rieth Park Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Contacts for all neighborhood associations are on the email distribution list and meetings are held with the neighborhood associations in preparation for all public facilities and improvement projects.
44	<b>Agency/Group/Organization</b>	<b>Shanklin Millrace Neighborhood</b>
	<b>Agency/Group/Organization Type</b>	Neighborhood association Neighborhood Organization
	<b>What section of the Plan was addressed by Consultation?</b>	Neighborhood development

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

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Agency is on email distribution list and is a member of the Region 2 Continuum of Care.
49	<b>Agency/Group/Organization</b>	<b>Community Fiber Network</b>
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers
	<b>What section of the Plan was addressed by Consultation?</b>	Broadband access
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Community Fiber Network was consulted about the existing and planned expansion of residential fiber (broadband) in Goshen, and in rural areas outside city limits where broadband alternatives are limited.
50	<b>Agency/Group/Organization</b>	<b>Surf Broadband</b>
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers
	<b>What section of the Plan was addressed by Consultation?</b>	Broadband access
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Surf Broadband coverage and expansion plans were reviewed online as well as Surf Broadband shared information about broadband internet expansion projects completed and in process for the City of Goshen at a council meeting.
51	<b>Agency/Group/Organization</b>	<b>Goshen Stormwater Department</b>
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Resilience planning
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	With input from City staff, Goshen's Stormwater Department completed a Climate Change Vulnerability Assessment for Stormwater in 2021, which includes a socio-economic profile that includes discussion of characteristics such as age, poverty, limited English proficiency, households without health insurance, disabilities, and education.
52	<b>Agency/Group/Organization</b>	<b>Goshen Department of Environmental Resilience</b>
	<b>Agency/Group/Organization Type</b>	Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Resilience planning

	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	In September 2019, the City of Goshen established a Department of Environmental Resilience, and City staff have worked together to adopt a Climate Action Plan in July of 2021.
53	<b>Agency/Group/Organization</b>	<b>Christopher B. Burke Engineering, LLC</b>
	<b>Agency/Group/Organization Type</b>	Engineering consultant
	<b>What section of the Plan was addressed by Consultation?</b>	Resilience planning
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	During 2020-22, City staff worked with Christopher B. Burke Engineering, LLC, to develop a Flood Resilience Plan which was adopted in July 2022.
54	<b>Agency/Group/Organization</b>	<b>AMERICAN STRUCTUREPOINT INC.</b>
	<b>Agency/Group/Organization Type</b>	Housing consultant
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Market Analysis
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Goshen Community Development worked with American Structurepoint Inc. to develop a Housing Market Analysis for the City of Goshen which was completed in April of 2022.
55	<b>Agency/Group/Organization</b>	<b>Frontier Communications</b>
	<b>Agency/Group/Organization Type</b>	Services - Broadband Internet Service Providers
	<b>What section of the Plan was addressed by Consultation?</b>	Broadband access
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	Frontier Communications shared information about broadband internet expansion projects completed and in process for the City of Goshen at a council meeting.

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

No agencies were excluded from consultation.

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

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

Table 3 – Other local / regional / federal planning efforts

### Narrative (optional)

While there is always room for improvement, strong partnerships exist between public, private, non-profit and institutional groups in Goshen, and between the Goshen and Elkhart City CDBG programs. These relationships, which are developed, facilitated and maintained through regular contact, are a primary strength of Goshen's CDBG program, and ensure consistent implementation of the annual plan. One outcome of these partnerships has been several combined applications for grant funding and designation of LaCasa as a CBDO beginning in program year 2020. These efforts demonstrate the level of cooperation and strong working relationships which exist, which will continue to be strengthened, and which will ensure the ongoing successful implementation of the CDBG annual plan.

Consultation and coordination included review and discussion of broadband service plans with several providers, along with ongoing work with multiple agencies related to resilience to address increasing natural hazard risks associated with climate change.

Based on information reviewed in January 2023 at broadbandnow.com, fiber, satellite and 5G Internet are listed along with cable, fixed wireless, and DSL as internet types available in Goshen, with 17 internet providers for business and 14 offering residential service. According to information reviewed in January 2023 at inmyarea.com, internet coverage by type for Goshen is 57% fiber, 76% cable, 92% DSL, 100% fixed wireless, and 100% satellite. Based on consultation with Community Fiber Network, a local provider, residential fiber expansion is ongoing in the City of Goshen and in rural areas around Goshen where existing alternatives are very limited.

In September 2019, the City of Goshen established a Department of Environmental Resilience, and in July 2021, the City of Goshen adopted a Climate Action Plan for Government Operations, which “is the City’s first attempt to reduce its impact on the global climate crisis. This plan is also an attempt to curb the climate change impacts that threaten the City and local community. At its heart, this plan is offered as a map toward equity for all of Goshen’s residents, now and into the future, human and non-human alike. Seeking a more fully humane community is in the deepest interest of all.”

During 2020-22, City staff worked with Christopher Burke Engineering, LLC, to draft a Flood Resilience Plan, which was adopted in July 2022. Per the Executive Summary, the “flood resilience plan identifies smart growth strategies to improve flood resilience in the City of Goshen. The approach is two-pronged. The first uses land-use planning policies to direct growth, economic



development, and capital improvement projects to areas that are less vulnerable to flooding. This will help to prevent the problem from spreading and getting worse. The second is to implement projects to protect the people and critical assets that already exist in the vulnerable flood risk areas.”

With input from City staff, Goshen’s Stormwater Department completed a *Climate Change Vulnerability Assessment for Stormwater* in 2021, which includes a socio-economic profile that includes discussion of characteristics such as age, poverty, limited English proficiency, households without health insurance, disabilities, and education.

The City of Goshen will continue to assess the increased natural hazard risks associated with climate change and the vulnerability to these risks of housing occupied by low- and moderate-income households as CDBG plans are developed and implemented.

*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**

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

Input for the 2023 Annual Action Plan was obtained through the following:

- Public hearing for current plan review and input for upcoming plan, January 20, 2023
- Invitation to Continuum of Care requesting input on 2023 Annual Action Plan and submittal timeline, February 23, 2023
- Public comment period for draft 2023 Annual Action Plan, March 14, 2023, through April 12, 2023
- Public hearing to receive input on draft 2023 Annual Action Plan and current plan review, March 20, 2023
- Public meeting to authorize submittal of 2023 Annual Action Plan, April 17, 2023

### Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Non-targeted/broad community Housing & Service Providers	Nine attendees, representing seven local agencies.	Comments used as a reference for the CDBG plan.	None	
2	Public Meeting	Continuum of Care	Regular COC meeting with 22 participants.	Information is included in the plan related to homeless needs.	None	
3	Outreach via email	Continuum of Care	Notice of 30-day public comment period, public hearing, and draft plan was provided to CoC.	Information is included in the plan related to homeless needs.	None	
4	Outreach via email	CDBG contact list	Notice of 30-day public comment period, public hearing, and draft plan was provided to CDBG contact list.	Comments are included in citizen participation section.	None	
5	Internet Outreach	Non-targeted/broad community	Notice of 30-day public comment period, public hearing, and draft plan was posted on the City website.	Comments are included in citizen participation section.	None	<a href="http://goshenindiana.org/cdbg">http://goshenindiana.org/cdbg</a>

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/ attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
6	Newspaper Ad	Non-targeted/broad community	Notice of 30-day public comment period, notice of public hearing, and availability of draft plan was published in the Goshen News.	Comments are included in citizen participation section.	None	
7	Public Hearing	Non-targeted/broad community	Regular Council meeting	Comments are included in citizen participation plan.	None	

Table 4 – Citizen Participation Outreach

## Expected Resources

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

#### **Introduction**

For program year 2023, direct funding available for CDBG is expected to include an annual entitlement grant of \$267,010, miscellaneous income of \$7,000, and prior year resources of \$78,000, for a proposed PY 2023 annual budget of \$352,010. The prior year resources of \$78,000 consist of funds from: PY 2019 = \$14,166.83 from the cancelled Northside Construction rehab activity, PY 2020 = \$4,429.24 remaining from a multi-family rehab project, and PY 2021 = \$59,403.93 from the owner occupied rehab activity.

The Federal appropriation was enacted at the time the 2023 annual plan was developed, the budget is based upon receipt of the actual formula allocation. The final amount of Program Income, if any, will be based on the total calculated at the time the plan is submitted to HUD, and the final Program Income total will be incorporated into the budget without further public notice. Due to no Program Income at the time the plan was developed, Miscellaneous Income was added to keep the budget from decreasing.

Based on past proposals, such as HUD's Moving CDBG Forward initiative, the City expects it could lose its entitlement grant at some point in the future, based on falling below the proposed minimum threshold. The City does not directly receive HOME, ESG, HOPWA or LIHTC.

Local agencies receiving public service grants will match CDBG funds with other federal, state, local and in-kind funds, including volunteer hours. When available, CDBG funds for owner-occupied housing rehabilitation and homeownership assistance will be used with other grants/loans, such as Federal Home Loan Bank and will also be used in conjunction with volunteer hours.

Warsaw Housing Authority administers a Housing Choice voucher program that includes vouchers used in Goshen, and provided over \$1.785 million in assistance payments for voucher holders in their most recent completed fiscal year.

## Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	267,010	0	78,000	345,010	285,000	A 2023 allocation of \$267,010 will be combined with \$78,000 of prior year resources. The prior year resources of \$78,000 consist of funds from: PY 2019 = \$14,166.83 from the cancelled Northside Construction rehab activity, PY 2020 = \$4,429.24 remaining from a multi-family rehab project, and PY 2021 = \$59,403.93 from the owner occupied rehab activity.
Other	public - local	Admin and Planning	7,000	0	0	7,000	0	Miscellaneous income of \$7,000 will be added to the overall budget

Table 5 - Expected Resources – Priority Table

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

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

Warsaw Housing Authority (WHA) administers a Housing Choice voucher program, that includes vouchers for Goshen, with FY 2022 total assistance for both areas at over \$1.785 million. There are approximately 186 vouchers in use in Goshen, with 39 of those vouchers being used for NED (non-elderly disabled) households.

Lacasa was awarded a total of \$754,000 in HOME funds and \$110,000 in Development Funds from IHCDA for two multi-unit rehab projects, one for PY2020 and another for PY2021. The first was \$122,000 of CDBG funds for rehab of a vacant four-unit rental property. The second was \$141,597 of CDBG funds for rehab of a three-unit rental property. Both projects have the goal to provide a total of 7 rental units affordable at 60% AMI. Rents will follow rents for HOME and IHCDA guidelines. Per HOME guidelines, these projects will also require a 20-year affordability period, with a concurrent five-year period with the use of CDBG funds. These two multifamily rehab projects are near completion.

During program year 2022, Lacasa expects to receive a HOME and Development funds award from IHCDA, used with \$130,000 in CDBG funds, for rehab of a four-unit rental property, to provide four rental units affordable at 60% AMI. Rents will follow the rents required by the primary funding source, in this case rents for HOME as set by IHCDA. The project is currently underway.

During program year 2022, Lacasa used a HOME innovation grant to construct four new homes in the City of Goshen as part of a new homeownership assistance program. CDBG funds allocated in PY2022 for homeownership assistance will be implemented in PY 2023 to assist low/mod single family home buyers in purchasing these homes.

Program year 2023 will include \$190,000 of CDBG funds to upgrade the energy systems of three existing affordable housing developments containing 39 units total, 38 of which are permanent support housing and 1 of which houses a resident manager unit at market rate. Location and units are as follows:

- 1101 West Lincoln Avenue Apartments with 15 total units of which, 14 are permanent supportive housing units at ≤ 80% AMI and 1 manager's unit at market rate.
- 1775 Westplains I Apartments with 16 permanent supportive housing units, 15 units at ≤ 30% AMI and 1 at ≤ 80% AMI.
- 1789 Westplains II Apartments with 8 permanent support housing units, 5 units at ≤ 40% AMI, 3 units at ≤ 60% AMI, and 1 – fully ADA accessible.

The CDBG funds will require a five-year affordability period based on investment of less than \$15,000 per unit and rents for all three buildings will follow rent limits for HOME as set by IHCDA and HUD.

Funding for the rehabilitation of approximately four (4) single-family, owner-occupied homes in program year 2023 is budgeted at \$58,010. CDBG funds will be matched with volunteer labor.

CDBG public service grants received by local organizations are matched with additional funding, including volunteer labor. In PY 2022, CDBG public service budgeted funds of \$47,000 were matched with **\$665,497.96** of State, local, private and other funds, as reported in IDIS as of March 10, 2023.

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

Not applicable.

**Discussion**

Approximately 70% of the total CDBG budget will be allocated toward housing activities, including single-unit rehab and energy efficiency improvements to be undertaken by a CBDO for multi-unit rehab, meeting the objective of creating and preserving decent housing for low/moderate income families and individuals, with the outcomes of available and affordable access to housing and rehabilitation services, and sustainable and viable neighborhoods.

Approximately 14% of the total 2023 CDBG budget will be used for public service grants, funded near the 15% maximum cap, with the objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals, with the outcomes of available and affordable access to primary healthcare, mental health supportive services, early childhood education, senior transportation, and daily nutrition programs.

Approximately 16% of the total 2023 CDBG budget will be spent for program planning & administration, which will facilitate the implementation of all other activities. Program planning funds will support neighborhood outreach in neighborhoods citywide to support the overall CDBG program and promote CDBG activities. General administration funds will be spent in support of the overall CDBG program.



## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing Rehabilitation Multi Unit	2020	2024	Affordable Housing		Housing Opportunities	CDBG: \$190,000	Rental units rehabilitated: 38 Household Housing Unit
2	Housing Rehabilitation Single Unit	2020	2024	Affordable Housing		Housing Opportunities	CDBG: \$58,010	Homeowner Housing Rehabilitated: 4 Household Housing Unit
3	Public Service Grants	2020	2024	Access to Services		Access to Services	CDBG: \$47,000	Public service activities other than Low/Moderate Income Housing Benefit: 778 Persons Assisted
4	Homeless Facilities	2020	2024	Homeless		Housing Opportunities Access to Services	CDBG: \$11,750	Homeless Person Overnight Shelter: 50 Persons Assisted
5	Homeownership Assistance	2022	2024	Affordable Housing		Housing Opportunities		

Table 6 – Goals Summary

## Goal Descriptions

1	<b>Goal Name</b>	Housing Rehabilitation Multi Unit
	<b>Goal Description</b>	In program year 2023, approximately 54% of the CDBG budget will be used for energy efficiency improvements to 38 multi units of permanent supportive housing, to be undertaken by a Community Based Development Organization. The objective is to create and preserve decent rental housing for low/moderate income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable neighborhoods. CDBG funds will likely be a primary funding source.
2	<b>Goal Name</b>	Housing Rehabilitation Single Unit
	<b>Goal Description</b>	The loan/grant program for owner-occupied housing rehabilitation will continue in program year 2023, with a goal of assisting four units per year, using approximately 16% of the program year 2023 budget. One goal of investing in owner-occupied rehabilitation is to stimulate investment by landlords in the area so that rental properties are also improved. Owner-occupied rehabilitation preserves existing housing at a much lower cost than new construction, and rehabilitation may encourage private investment in maintenance and rehabilitation by neighbors. This program assists elderly residents and people with special needs to continue living in their homes and neighborhoods. The objective is to support the retention of decent housing, with the outcome of affordable rehabilitation services.
3	<b>Goal Name</b>	Public Service Grants
	<b>Goal Description</b>	In program year 2023, approximately 14% of the overall CDBG budget (funded near the 15% cap and including funding for homeless facilities) will be used for public service grants, with the objectives of creating a suitable living environment for low/moderate income families and individuals, with the outcomes of available and affordable access to services, such as primary healthcare, mental health supportive services, early childhood education, transportation and daily nutrition programs.
4	<b>Goal Name</b>	Homeless Facilities
	<b>Goal Description</b>	In program year 2023, CDBG funding for homeless facilities will be used to support the daily meals and healthy snack program at Goshen Interfaith Hospitality Network. The objective for support of homeless facilities is to provide decent housing and a suitable living environment, with the outcomes of the housing and related services being available and affordable.

<b>5</b>	<b>Goal Name</b>	Homeownership Assistance
	<b>Goal Description</b>	In program year 2023, CDBG funding from program year 2022 will be implemented to provide direct homeownership assistance to help low/mod income homebuyers purchase single family homes in Goshen, with a goal of assisting four households. The objective is to provide decent housing, with the outcome of the housing being affordable. The assistance provided will be forgivable over a period of 5 years, may include up to 50% of the down payment, all or part of: reasonable closing costs and up-front mortgage insurance premium, funds to reduce the: interest rate and/or mortgage principal.

## Projects

### AP-35 Projects – 91.220(d)

#### Introduction

In Program Year 2023, with a budget of \$352,010, including a formula allocation of \$267,010, miscellaneous income of \$7,000, and \$78,000 of prior year resources, the following projects are expected to received CDBG funding:

1. Public Service grants (\$47,000) for direct assistance to low- and moderate-income families to meet the objective of a suitable living environment, with the outcome of providing access to affordable services, such as a daily nutrition program, senior transportation, shelter meals, primary medical care, mental health supportive services, and early childhood education;
2. Rehabilitation of single-family, owner-occupied housing (\$58,010) to meet the objective of decent housing, with the outcome of available and affordable rehabilitation of owner-occupied housing for low- and moderate-income Goshen homeowners;
3. Energy conservation improvements to multi-family, rental housing (\$190,000) to meet the objective of decent housing, with the outcomes of available and affordable access to high quality rental housing for Goshen renters, and support for sustainable and viable neighborhoods; and
4. Program planning and general administration (\$57,000).

#### Projects

#	Project Name
1	Program Administration
2	Program Planning
3	Boys & Girls Club
4	Council on Aging of Elkhart County
5	Elkhart County Clubhouse
6	Goshen Interfaith Hospitality Network
7	Maple City Health Care Center
8	Walnut Hill Early Childhood Center
9	Single Unit Housing Rehab
10	Energy Conservation Multi Unit Housing

Table 7 - Project Information

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

##### Multi-Unit Housing Rehab – Energy Efficiency Improvements:

Undertaken by a CDBO

Approximately 54% of the budget

Objective is to create and preserve decent rental housing for low/mod income families and individuals

Outcomes of available and affordable access to high quality rental housing  
Support for sustainable and viable neighborhoods  
Goal for 2023 is 39 units (38 affordable, 1 market rate)  
Require a five-year affordability period based on investment of less than \$15,000 per unit

**Owner-Occupied Housing Rehab:**

Approximately 16% of the budget  
Objective of supporting the retention of decent, safe housing  
Outcome of affordable rehab services  
Goal for 2023 is 4 units

**Direct Homeownership Assistance**

Funded in program year 2022, implemented in 2023  
Objective of providing decent, affordable housing  
Outcome of affordable housing for low/mod income single family homebuyers

**Public Service Grants**

Approximately 14% of the budget, funded at the 15% maximum cap  
Objectives of creating a suitable living environment and providing decent housing for homeless and low/moderate income families and individuals  
Outcomes of available and affordable access to primary healthcare, mental health supportive services, early childhood education, senior transportation, and daily nutrition programs.

**Program Planning & Administration**

Approximately 16% of the budget, funded at the 20% maximum cap  
Facilitate the implementation of all other activities  
Planning funds primary objective is to support neighborhood outreach in income eligible areas  
General administration funds will be spent in support of the overall CDBG program

The City of Goshen will implement the CDBG priorities using a neighborhood-based strategy, with the primary objective of creating a suitable living environment, with the outcome of a more sustainable and livable neighborhood. The CDBG focus areas are based on income eligible Census block groups, which are typically older areas where investment is needed in housing and infrastructure. Outreach efforts will strengthen neighborhood associations and help support implementation of CDBG activities, such as identifying homeowners in need of housing rehabilitation assistance. The neighborhood-based strategy has been used successfully in several previous neighborhoods, and, based on this positive experience, the City plans to continue this strategy of concentrating housing rehabilitation, public facilities improvements, community development activities, and support for neighborhood associations within a specific neighborhood in order to maximize the impact of limited funds.

Within the areas eligible for CDBG funding, obstacles to meeting underserved needs include an inadequate amount of CDBG funding, lack of participation by landlords and neighborhood residents who own property in the area, and lack of awareness. These obstacles will be addressed through the cooperative implementation of the CDBG plan, with the City, local public service organizations, Lacasa, Habitat for Humanity, and the families and individuals in neighborhoods working together. Part of the strength of the Goshen CDBG program is a result of the positive working relationships that exist between the City and local partners, including other public agencies, non-profit agencies,

and neighborhood residents. Lacasa's neighborhood outreach worker and the City's neighborhood association coordinator will continue to work together to develop and strengthen neighborhood associations. When neighborhood associations are active, residents work together to improve their neighborhood and implementation of the CDBG program is more effective.

AP-38 Project Summary

**Project Summary Information**

<b>1</b>	<b>Project Name</b>	Program Administration
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Multi Unit Housing Rehabilitation Single Unit Public Service Grants Homeless Facilities Homeownership Assistance
	<b>Needs Addressed</b>	Housing Opportunities Access to Services Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$43,000 Misc Income: \$7,000
	<b>Description</b>	Program administration to pay for staff, staff training, supplies and other administrative costs.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	General Program administration funds will pay for staff, staff training, supplies and other administrative costs in support of the implementation and administration of the overall CDBG program.
<b>2</b>	<b>Project Name</b>	Program Planning
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Multi Unit Housing Rehabilitation Single Unit
	<b>Needs Addressed</b>	Housing Opportunities Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$7,000
	<b>Description</b>	Program planning, including neighborhood outreach, in support of the CDBG program and CDBG activities.
	<b>Target Date</b>	6/30/2024

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	
	<b>Location Description</b>	
	<b>Planned Activities</b>	Program planning, including neighborhood outreach, in support of the CDBG program and CDBG activities.
<b>3</b>	<b>Project Name</b>	Boys & Girls Club
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$6,855
	<b>Description</b>	Provide support for daily nutrition program at Boys & Girls Club.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 500 school-age, low/mod income children will benefit.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income individuals and families, with the objective of making services available and affordable, including access to a daily nutrition program at the Boys & Girls Club.
<b>4</b>	<b>Project Name</b>	Council on Aging of Elkhart County
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$5,140
	<b>Description</b>	Provide support for senior transportation program.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 12 low/mod income senior citizens will benefit.
	<b>Location Description</b>	



	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income individuals and families, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including support for the Goshen senior transportation program at the Council on Aging.
5	<b>Project Name</b>	Elkhart County Clubhouse
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$4,160
	<b>Description</b>	Provide support for daily lunch program for individuals with mental illness.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 100 low/mod individuals who are considered disabled because of mental illness will benefit.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit low/moderate income individuals and families, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including support for the daily lunch program for those with mental illness at the Elkhart County Clubhouse.
6	<b>Project Name</b>	Goshen Interfaith Hospitality Network
	<b>Target Area</b>	
	<b>Goals Supported</b>	Homeless Facilities
	<b>Needs Addressed</b>	Housing Opportunities Access to Services
	<b>Funding</b>	CDBG: \$11,750
	<b>Description</b>	Provide support for shelter healthy eating program.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 50 individuals, including homeless families with children and single females, will benefit.

	<b>Location Description</b>	
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of service programs designed to benefit homeless individuals, including families with children, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services available and affordable, including support for the shelter meal and snack program at Goshen Interfaith Hospitality Network.
7	<b>Project Name</b>	Maple City Health Care Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$5,385
	<b>Description</b>	Provide support for integrated primary health care.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 100 low/mod individuals will benefit.
	<b>Location Description</b>	
	<b>Planned Activities</b>	Funding in this category will contribute to direct support fo service programs designed to benefit low/moderate income individuals and families, with the objective of supporting and enhancing a suitable living environment, with the outcome making services available and affordable, including access to affordable primary health care at Maple City Health Care Center.
8	<b>Project Name</b>	Walnut Hill Early Childhood Center
	<b>Target Area</b>	
	<b>Goals Supported</b>	Public Service Grants
	<b>Needs Addressed</b>	Access to Services
	<b>Funding</b>	CDBG: \$13,710
	<b>Description</b>	Provide support to supplement parent fees for early childhood education.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 16 low/mod income children will benefit.

	<b>Location Description</b>	
	<b>Planned Activities</b>	Funding in this category will contribute to direct support of services programs designed to benefit low/moderate individuals and families, with the objective of supporting and enhancing a suitable living environment, with the outcome of making services affordable and available, including access to affordable early childhood education at Walnut Hill Early Childhood Center.
<b>9</b>	<b>Project Name</b>	Single Unit Housing Rehab
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Single Unit
	<b>Needs Addressed</b>	Housing Opportunities Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$58,010
	<b>Description</b>	Rehabilitation of single-family, owner-occupied housing units, to improve housing for low- and moderate-income homeowners.
	<b>Target Date</b>	6/30/2024
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 4 low/mod homeowners will benefit.
	<b>Location Description</b>	
	<b>Planned Activities</b>	The City intends to continue the loan/grant program for owner-occupied housing rehabilitation in program year 2023. One goal of investing in owner-occupied rehabilitation is the stimulate investment by landlords in the area so that rental properties are also improved. Owner-occupied rehabilitation preserves existing housing at a much lower cost than new construction, and rehabilitation may encourage private investment in maintenance and rehabilitation by neighbors. This program assists elderly residents and people with special needs to continue living in their homes and neighborhoods. The objective is to support the retention of decent housing, with the outcome of affordable rehabilitation services.
<b>10</b>	<b>Project Name</b>	Energy Conservation Multi Unit Housing
	<b>Target Area</b>	
	<b>Goals Supported</b>	Housing Rehabilitation Multi Unit
	<b>Needs Addressed</b>	Housing Opportunities Neighborhood Revitalization
	<b>Funding</b>	CDBG: \$190,000

<b>Description</b>	Energy conservation for multi-family, rental housing units, to maintain & preserve quality rental housing for low-and moderate-income renters.
<b>Target Date</b>	6/30/2024
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	An estimated 38 low/mod households and housing units will benefit
<b>Location Description</b>	
<b>Planned Activities</b>	Energy efficiency improvements for multi-unit affordable housing, to be undertaken by a Community Based Development Organization. The objective is to preserve affordable rental housing for low/moderate income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable neighborhoods.

## *AP-50 Geographic Distribution – 91.220(f)*

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

Goshen's population is contained within ten Census tracts (1, 2, 3.01, 3.02, 4, 5.01, 5.02, 6, 13 and 20). Based on the 2021 low/mod income summary data (LMISD) released by HUD for CDBG, effective April 1, 2021, four Census tracts, 1, 2, 3.02, and 5.02 contain the highest percentage of low/mod income population, with a total of seven of the 14 block groups within the four Census tracts containing 51% or more low/mod income population, making them income eligible areas for CDBG. These income eligible areas are: block group 2 in Census tract 1, block groups 1, 3 and 4 in Census tract 2, block groups 2 and 3 in Census tract 3.02, and block group 1 in Census tract 5.02. A map of the seven income-eligible block groups is provided as an attachment. This map is dated 2019, but the data for FY 2022 remained unchanged according to the April 2022 release. There has been no update to date for FY 23.

Census 2020 data indicates that Goshen's population has increased an estimated 5% since 2010 data was released and is 66.3% White, 3.5% Black/African American, 1.8% Asian, and 25.9% Hispanic/Latino.

The 2015-2019 ACS CHAS data indicates that almost half (48%) of households in Goshen are low-mod income. Renters make up a higher percentage of low-mod income households at 28% and owners at 20% of the total 48%. Compare this to the data for the state of Indiana where there is a fairly equal distribution between owners and renters below 80% AMI.

The 2015-2019 ACS CHAS data indicates that 74% of households in Goshen have a housing cost burden of < 30%. However, when breaking it down further, nearly half (48%) are owners, while only about a quarter (26%) of those without a housing cost burden are renters. Furthermore, 33% of low/mod income households (renters and owners combined) have a housing cost burden that is >30% and in regards to housing problems, 89% of them are found amongst low/mod income occupants.

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

for quality affordable housing for both renters and owners.

### **Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>

Table 8 - Geographic Distribution

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

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

### **Discussion**

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

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

## Affordable Housing

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

#### **Introduction**

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

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

The City is not aware of any local ordinances or policies which create unreasonable barriers to affordable housing. The City will continue to explore incentives and opportunities available for the development of affordable housing, and will continue to use local public resources for infrastructure improvements to enhance living conditions in low/moderate income neighborhoods. Efforts will continue to preserve existing affordable housing and create new affordable housing, through housing rehabilitation and new construction. To attract and stimulate housing development, the City is working on creating a residential Tax Increment Financing (TIF) policy. Beginning in PY 2022, the City began providing direct homeownership assistance through CDBG to increase access to affordable housing for low/mod income homebuyer households.

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

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

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

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

Oaklawn, the service provider, with a total of 38 units in Goshen at three locations.

LaCasa applied for a total of 9 project-based vouchers (PBV) for two of their properties in early 2021. The Lincoln Avenue Redevelopment property (including Shoots and Hattle buildings) has 28 units, and LaCasa requested 7 PBVs. Approval for these vouchers are is still in process with potential issuance this year. The Westplains II property has 8 units, and LaCasa requested and was approved for 2 PBVs in May 2021.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	42
Special-Needs	0
<b>Total</b>	<b>42</b>

Table 9 - One Year Goals for Affordable Housing by Support Requirement

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	0
The Production of New Units	0
Rehab of Existing Units	42
Acquisition of Existing Units	0
<b>Total</b>	<b>42</b>

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

## Discussion

Census 2020 data indicates that Goshen's population has increased 5% since 2010 data was released and is 66.3% White, 3.5% Black/African American, 1.8% Asian, and 25.9% Hispanic/Latino. The 2015-2019 ACS CHAS data indicates that almost half of households in Goshen are low-mod income with a higher percentage of them being renters. Compared to the state of Indiana where there is a fairly equal distribution between owners and renters < 80% AMI. CHAS also indicates higher percentages of housing problems and cost burden in both renter and owner low-mod income households.

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

Energy conservation improvements are planned to 38 PSH rental units, through multi-unit rehab, to be undertaken by a CBDO. In addition, completing: Act #298 from 2020, 4 units, Act #316 from 2021, 3 units and Act #326 from 2022, 4 units. The objective is to create and preserve high quality affordable rental housing for low/mod income families and individuals, with the outcomes of available and affordable access to high quality rental housing, and support for sustainable and viable



neighborhoods.

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

In PY 2023, the goal is to rehab 4 single-unit owner-occupied homes, with CDBG funds matched with local, state and federal funds, and private and in-kind donations and volunteer labor. This program targets low/mod income elderly, persons with disabilities, and large and small related households who want to continue living in their homes. Assistance is primarily in the form of deferred loans and available citywide. Rehab preserves existing housing, encourages private investment in maintenance and rehab in the neighborhood.

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

Warsaw Housing Authority (WHA) administers a housing choice voucher program that includes vouchers for Goshen. Goshen Housing Authority was dissolved in November 2018, and Goshen vouchers were absorbed by WHA. WHA has committed to maintaining housing choice voucher assistance in Goshen. One-year goals for PY 2023 are based on the 186 Housing Choice vouchers currently in use, including 147 standard vouchers and 39 NED vouchers for persons with disabilities.

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

Support for homeless persons and persons with special needs will continue in PY 2023 through support for emergency shelter and permanent supportive housing (PSH). PSH in Goshen is a partnership of Lacasa, the owner/developer, and Oaklawn, the service provider, with a total of 38 PSH units at three sites. PSH is a successful model that provides stable housing and supportive services and aims to fill a gap in housing needs for Oaklawn clients, by providing independent options for clients who are at risk of being underhoused.

**Priority #5: Homeownership Assistance (Low/mod income homebuyers, 0-80% AMI)**

The goal is to provide direct assistance to low/mod income households for acquisition of affordable single family housing, through assistance of up to 50% of the down payment, all or part of reasonable closing costs, and/or up-front mortgage insurance premium, funds to reduce the interest rate, and/or mortgage principal. Lacasa used a HOME Innovation grant to construct four new single family homes in the City of Goshen as part of a homeownership assistance project. In PY2023 the homeownership assistance program will be implemented with PY2022 CDBG funds to assist low/mod single family homebuyers in purchasing these four homes.

## *AP-60 Public Housing – 91.220(h)*

### **Introduction**

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

In their most recent completed fiscal year, Warsaw Housing Authority administered approximately \$1.785 million in housing assistance to voucher recipients, a 6% decrease from the prior year. There are approximately 186 vouchers currently in use in Goshen, including 39 NED (non-elderly disabled) vouchers for persons with disabilities.

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

There is strong local support for maintaining access to housing choice vouchers, and WHA has committed to maintaining housing choice voucher assistance in Goshen. The CDBG program advocates to preserve the use of housing choice vouchers in the City of Goshen and has led initiatives to garner more support for WHA operations and capacity building, promoting greater accessibility for their services for City of Goshen residents.

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

There are no public housing units in Goshen. Warsaw Housing Authority (WHA) operates a Housing Choice voucher program, including vouchers for Goshen, which were absorbed when Goshen Housing Authority was dissolved in 2018. WHA works closely with other agencies who provide services for low- and moderate-income families, and have been working with volunteers in Goshen who are providing case management. WHA operates a Good Housekeeping Award program, initiated in 2015, to promote pride in housing and to encourage tenants to keep units clean and immediately report maintenance issues rather than waiting for an inspection. In 2022, nearly half, 52%, of Goshen WHA clients received a Good Housekeeping award. One resident's name from Goshen was drawn for a prize. He received a \$150 gift certificate that he was going to use to buy food and clothing. WHA also has been administering a Rental Education class, educating new voucher holders about the fundamentals of being a good, well-informed tenant.

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

Not applicable.

### **Discussion**

In addition to the Housing Choice voucher program, subsidized housing available in Goshen

includes:

- Section 8, 250 units at Greencroft Goshen are Income based rental units for elderly
- Section 202 PRAC, 41 units at Maple Leaf Commons are supportive housing for elderly
- Income Based Rental, 15 units at Mercer Manor are supported by USDA rural development
- Low Income Housing, 72 units at Arbor Ridge Apartments are Lacasa-general partner and property manager funded through Low Income Housing Tax Credit Project
- Affordable Rentals, 28 units at Lincoln Avenue Apartments (Hattle Hotel and Shoots Building). Both buildings were deteriorating, now newly renovated creating efficiency one- and two- bedroom units
- Low/Mod Rentals, 60 units at Maple Court Place Apartments were funded by Low-Income Housing Tax Credit Project in 2011 housing and contain 6 – 1 bedroom, 24 – 2 bedroom, 24 – 3 bedroom, and 6 – 4 bedroom apartments.
- Affordable Rentals, 33 units at Hawks Arts and Enterprise Center. Opened in 2015 and funded by \$6.8 million of LIHTC, HOME and FHLB funds.
- Permanent Supportive Housing (PSH), 8 units at Westplains II. A 2021 Lacasa/Oaklawn project to fill a gap in housing needs for Oaklawn clients by providing independent options for clients who are at risk of being under/unstably housed. Units are: 5 – ≤ 40% AMI, 3 – ≤ 60% AMI, 1 – fully ADA accessible.
- Permanent Supportive Housing (PSH), 16 units at Westplains I Apartments. Rental assistance is provided through rental assistance vouchers, formerly known as Shelter+Care vouchers. Lacasa is the owner/developer and Oaklawn Psychiatric Center is the service provider. Units are: 15 - ≤ 30% AMI, 1 - ≤ 80% AMI.
- Permanent Supportive Housing (PSH), 14 (+ 1) units at Lincoln Avenue West Apartments. Rental assistance is provided through rental assistance vouchers, formerly known as Shelter+Care vouchers. Lacasa is the owner/developer and Oaklawn Psychiatric Center is the service provider. Units are: 14 - ≤ 80% AMI, and 1 – market rate for resident manager.
- Benham Avenue Apartments, located in the City of Elkhart, is another permanent supportive housing partnership of LaCasa and Oaklawn Psychiatric Center which opened in April 2020. This \$1.8 million project included HOME, Housing Trust Fund and IHEDA Development Funds and also utilizes rental assistance/project-based vouchers for their tenants.

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

### **Introduction**

Advocacy, education and coordination of housing and homeless programs in Indiana is managed by the Indiana Housing & Community Development Authority (IHCDA), through the regional Continuum of Care (CoC) network. Goshen, located in Elkhart County, is part of Region 2 CoC, and actively participates with the Indiana Region 2 Homeless Coalition, which meets bi-monthly. Goshen's CDBG administrator serves on the executive committee of the CoC. The City of Goshen does not expect to receive any direct public or private funding in program year 2023 to address homeless needs and to prevent homelessness.

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

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

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

1. A total of 38 units of permanent supportive housing have been constructed and occupied in Goshen;
2. In program year 2019, construction began for a new permanent supportive housing (PSH) project in the City of Elkhart, Benham Avenue Apartments, to provide 11 new housing units and supportive services for chronically homeless. Occupancy began in April 2020. Funding for the \$1.8 million project included HOME, Housing Trust Fund, and IHCDA Development Fund, with rental assistance provided through Shelter+Care vouchers. The PSH project is another partnership of Lacasa, the owner/developer, and Oaklawn Psychiatric Center, the service provider;
3. In November of 2022, Goshen Interfaith Hospitality Network had a grand opening of a homeless shelter in a rehabilitated elementary school in the City of Goshen. For 27 years they had operated out of various churches and hotels. They have named the facility First Light Mission and are housing approximately 39 individuals.
4. Westplains II, a Lacasa/Oaklawn project to increase affordable rental options, was completed and occupied in late Spring 2021, and includes 8-one bedroom-units, with five units  $\leq$  40% AMI and three units  $\leq$  60% AMI, and one unit fully ADA accessible. Westplains II aims to fill a gap in housing needs for Oaklawn clients, by providing independent options for clients who are at risk of being under/unstably housed;
5. Agencies outside the City of Goshen, such as Oaklawn Psychiatric Center, Elkhart County Clubhouse, Salvation Army, Warsaw Housing Authority, The Window, and Elkhart Township Trustee's office, will continue to provide supportive services to the chronically homeless population;
6. The Indiana Region 2 Homeless Coalition will continue to work with IHCDA to increase the effectiveness of the Region 2 Continuum of Care; and
7. The City of Goshen, City of Elkhart, Faith Mission, Lacasa, Oaklawn Psychiatric Center, Goshen Interfaith Hospitality Network, Habitat for Humanity, and other local agencies will

continue to hold regular discussions and work together to address issues related to chronic homelessness.

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

Within Elkhart County, emergency shelter for homeless individuals and families is provided by Faith Mission, located in the City of Elkhart. In Goshen, emergency shelter for families and single women and families is provided by Goshen Interfaith Hospitality Network (GIHN) also known as First Light Mission. Emergency shelter for victims of domestic violence is provided by the YWCA Safe Haven Women's Shelter. Permanent supportive housing (PSH) is provided in Elkhart County by AIDS Ministries and Oaklawn Psychiatric Center, with 38 fixed-site PSH units in Goshen, and an additional 36 fixed and scattered site (vouchers) beds in Elkhart County. Transitional housing for homeless households is provided by Emerge Ministries, located in the City of Elkhart, with a total of 16 beds, serving households with and without children. Faith Mission's transitional housing program is undergoing rehabilitation at 525 Middlebury Street. When the project is completed this year, it will contain 11 apartments, with two or three bedroom units, for families with children. In December 2022, Faith Mission opened their Tiny House Village on campus which includes 12 individual homes as part of their transitional housing program to provide a low-cost housing option to clients while also encouraging them toward financial independence and long-term stable housing.

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

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

Three permanent supportive housing (PSH) projects have been constructed in Goshen. The first PSH project, Lincoln West Apartments, contains 14 units, and was completed in December 2011 and fully occupied by March 2012. The second PSH project, Westplains Apartments, with 16 units, was completed in January 2014 and was fully occupied by March 2014. The third PSH project, Westplains II was completed and occupied in late Spring 2021, and includes 8-one bedroom-units, with five units  $\leq$  40% AMI and three units  $\leq$  60% AMI, and one unit fully ADA accessible. Westplains II aims to fill a gap in housing needs for Oaklawn clients, by providing independent options for clients who are at risk of being under/unstably housed. The PSH projects are a partnership of Lacasa, the

owner/developer, and Oaklawn Psychiatric Center, the service provider.

Benham Avenue Apartments, a new Lacasa-Oaklawn PSH project with 11 units in the City of Elkhart, was under construction in PY 2019, and completed and occupied in Spring 2020.

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

The Indiana Region 2 Homeless Coalition is a group of agencies and organizations interested in homelessness who meet regularly to share data and information on homelessness, facilitate dialogue among service providers, and coordinate community resources and services for the benefit of individuals and families who are homeless or in imminent danger of becoming homeless, thereby reducing homelessness. The Coalition has participation from a large number of local agencies, which during calendar year 2022 included AIDS Ministries, Beaman Home, Beacon Medical, Bowen Center, Bradley Company, Brightpoint, CAPS, Center for Business Excellence, Church Community Services, City of Elkhart, City of Goshen, Concord Schools, Elkhart Community Schools, Elkhart County Public Defender, Elkhart County Special Education Cooperative, Elkhart Housing Authority, Elkhart Excel Center, Emerge Ministries, Faith & Hope Houses, Faith Mission, Fellowship Missions, Goodwill, Goshen Community Schools, Guidance Ministries, Goshen Interfaith Hospitality Network, Habitat for Humanity, Indiana Health Centers, Lacasa, Maple City Health Care Center, MDwise, MHS Medicaid, Oaklawn Psychiatric Center, Project Scope, Recovery Café, Salvation Army Goshen, Senator Todd Young's office, Serenity Place, SPA Women's Ministry, Veteran's Administration, and YWCA of Northern Indiana. The Coalition and direct connections with participating agencies are the primary structure through which the City of Goshen will carry out its homelessness strategy.

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

The most direct method of preventing homelessness for the City is the Housing Choice Voucher program. Warsaw Housing Authority (WHA) operates a Housing Choice voucher program, which includes vouchers for Goshen. Goshen Housing Authority was dissolved in November 2018. The Housing Choice voucher program provided approximately \$1.785 million in assistance payments in its most recently completed fiscal year. There are approximately 186 vouchers currently in use in Goshen, including 39 for persons with disabilities.

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

strategy to ensure that individuals are not released from institutions into homelessness.

In 2020, Project Scope, a 4-5 bed transitional housing program for men coming out of incarceration started in the City of Elkhart.

The Elkhart County Reentry Initiative (ECRI) is a collaborative group of local agencies and service providers that aims to meet monthly to network and share resources with the goal of removing barriers to successful reentry from incarceration and to reduce recidivism, which is estimated at 30-70% for Elkhart County. Some of the challenges faced by individuals returning to the community from prison are employment, education, housing, transportation, access to resources, health (addictions/mental illness/physical), accountability and a changing world. ECRI is providing training for mentors, accountability partners or transitional coaches to help individuals with reentry challenges.

## **Discussion**

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

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

### **Introduction:**

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

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

The City is not aware of any local ordinances or policies which create unreasonable barriers to affordable housing. The City will continue to explore incentives and opportunities available for the development of affordable housing, and will continue to use local public resources for infrastructure improvements to enhance living conditions in low/moderate income neighborhoods. Efforts will continue to preserve existing affordable housing and create new affordable housing, through housing rehabilitation and new construction. To attract and stimulate housing development, the City is working on creating a residential Tax Increment Financing (TIF) policy. In PY 2022, the City began providing direct homeownership assistance through CDBG to increase access to affordable housing for low/mod income homebuyer households.

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

Census 2020 data indicates that Goshen's population has increased an estimated 5% since 2010 data was released and is 66.3% White, 3.5% Black/African American, 1.8% Asian, and 25.9% Hispanic/Latino. The 2015-2019 ACS CHAS data indicates that almost half (48%) of households in Goshen are low-mod income with a higher percentage of them being renters. Compare this to the data for the state of Indiana where there is a fairly equal distribution between owners and renters below 80% AMI. It also indicates higher percentages of housing problems and cost burden in both renter and owner low-mod income households.

Efforts to address barriers include the City of Goshen Redevelopment Department citywide housing market analysis, published in May of 2022, to gather information on housing availability and



affordability, housing conditions, and future housing development priorities. Current demand estimates indicated the Goshen housing market was underserved. Looking at current and projected demand, it was estimated that the local market needs approximately 4,537 new housing units, which is a 33% increase, through 2030 (2,466 rental and 2,017 owner-occupied). It was also noted that there was a need for more low/mod affordable housing units that could only be built with government subsidies to keep expenses lower and meet that demand. Information from the analysis is being used to identify general strategies to address housing needs and future developments.

## **Discussion:**

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

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

Permanent supportive housing (PSH) is a partnership of Lacasa, the owner/developer, and Oaklawn, the service provider, with a total of 38 units in Goshen at three locations. PSH is a successful model that provides stable housing and supportive services.

Current projects and efforts to remove barriers include:

- The Warsaw Housing Authority administers the Housing Choice Voucher Program which includes vouchers for City of Goshen. Since April 2022, with support from the City of Goshen, Warsaw Housing Authority has staff in Goshen every Tuesday, to accept pre-applications and complete re-certifications for existing voucher holders, to promote greater accessibility to their services for City of Goshen residents and preserve the utilization of vouchers. In addition, they are providing a monthly Rental Education class in Goshen, educating new voucher holders about the fundamentals of being a well-informed tenant and linking clients to community resources.
- Westplains II, a Lacasa project from 2021, to increase affordable rental options, with 5 units ≤ 40% AMI and 3 units ≤ 60% AMI, to divert Oaklawn clients from homelessness and provide independent options for clients who would otherwise be underhoused.
- A Lacasa project with two units at 102 N 9th St, completed in 2020, to increase rental housing options, with each 3-bedroom unit for families ≤ 60% AMI.
- Lacasa received approval for 2 project-based vouchers at Westplains II late Spring 2021. Lacasa's application for 7 project-based vouchers for their Lincoln Avenue Redevelopment properties is still pending with estimated approval in 2023.
- A \$1.4 million Lacasa project for rehab of 5 multi-family dwellings in East Lincoln Crossroads to provide 20 quality rental units of which 16 units have been completed to-date. The last 4 units will complete in summer of 2023.
- A Lacasa HOME Innovation Grant for affordable housing construction in Goshen was

obtained. In 2022-23 the program constructed 4 affordable single-family houses for sale to families at or below 80% AMI, with pre-purchase counseling, home ownership training, financial education, and matched savings. The HOME Innovations program will be enhanced by CDBG direct homeownership assistance to 4 Goshen homebuyers, forgivable over a period of 5 years, including up to 50% of the down payment, all or part of reasonable closing costs and/or part of the up-front mortgage insurance premium, and funds to reduce the interest rate and/or mortgage principal.

- Lacasa financial empowerment services include financial training/coaching, matched savings, homebuyer training, and workplace financial empowerment.
- In October 2021 ground breaking began on a \$30 million project to build a 120 unit assisted living facility in Goshen. The project, named Green Oaks, goal is to provide modern, affordable housing for area elderly seniors who are at or below 80% AMI. This residential care facility at 282 Johnston Street will be completed in 2023.

## *AP-85 Other Actions – 91.220(k)*

### **Introduction:**

The 2020-2024 five-year consolidated CDBG plan includes the following priorities, which will guide the choice of specific activities and actions for program year 2023:

#### **1) Housing Opportunities**

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

#### **2) Access to Services**

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

#### **3) Neighborhood Revitalization**

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

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

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

Census 2020 data indicate that Goshen's population has increased an estimated 5% since 2010 data was released and is 66.3% White, 3.5% Black/African American, 1.8% Asian, and 25.9% Hispanic/Latino. The 2015-2019 ACS CHAS data indicates that almost half (48%) of households in Goshen are low-mod income with a higher percentage of them being renters. Compare this to the data for the state of Indiana where there is a fairly equal distribution between owners and renters below 80% AMI. It also indicates higher percentages of housing problems and cost burden in both renter and owner low-mod income households.

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

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

Permanent supportive housing (PSH) is a partnership of Lacasa, the owner/developer, and Oaklawn, the service provider, with a total of 38 units in Goshen at three locations. PSH is a successful model that provides stable housing and supportive services.

- Since April 2022, with support through a grant from the City of Goshen, Warsaw Housing Authority has staff in Goshen every Tuesday, to accept pre-applications and complete re-certifications for existing voucher holders, to promote greater accessibility to their services for City of Goshen residents and preserve the utilization of vouchers. In addition, they are providing a monthly Rental Education class in Goshen, educating new voucher holders about the fundamentals of being a well-informed tenant and linking clients to community resources.
- Westplains II, a Lacasa developed project in partnership with Oaklawn, to increase affordable rental options, with 5 units ≤ 40% AMI and 3 units ≤ 60% AMI, to divert Oaklawn clients from homelessness and provide independent options for clients who would otherwise

be underhoused, was completed and occupied in 2021.

- In 2021 with the help of a HOME Innovation Grant Lacasa started a project for 4 new single family homes at 307 S 7th St, 224 S 7th S, 715 N 7th St, and 212 Crescent St. to provide affordable homeownership opportunities in Goshen for families at or below 80% AMI. The program includes pre-purchase counseling, home ownership training, financial education, and matched savings. The HOME Innovations program will be enhanced by CDBG direct homeownership assistance implemented in PY2023 for the 4 Goshen homebuyers. Loans will be forgivable over a period of 5 years, including up to 50% of the down payment, all or part of: reasonable closing costs, up-front mortgage insurance premium, and funds to reduce the interest rate, and/or mortgage principal.
- A Lacasa project with 2 (3-bedroom) units at 102 N 9th St, completed in 2020, to increase rental housing options for families  $\leq$  60% AMI.
- Lacasa received approval for 2 project-based vouchers at Westplains II late Spring 2021. Lacasa's application for 7 project-based vouchers for their Lincoln Avenue Redevelopment properties is pending with estimated approval in 2023.
- A \$1.4 million Lacasa project for rehab of 5 multi-family dwellings in East Lincoln Crossroads to provide 20 quality rental units and 16 units have been completed to-date. The last 4 units will be finished summer of 2023.
- Lacasa financial empowerment services include financial training/coaching, matched savings, homebuyer training, and workplace financial empowerment.

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

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

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

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

reported to the State Board of Health, the property owner and the parents/guardian.

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

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

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

The Housing Choice voucher program is an essential foundation of the City's housing strategy, as it assists families so that they pay no more than 30 percent of their gross income for rent and utilities. This reduces the need for constant shifting of housing units, and provides stability so children are able to remain in the same school for no less than one year.

In addition to the Housing Choice voucher program, other affordable housing in Goshen includes:

- 250 = Section 8 elderly units at Greencroft Goshen,
- 41 = Section 202 PRAC units for elderly in Maple Leaf Commons,
- 15 = income-based rental units at Mercer Manor, supported by USDA Rural Development,
- 60 = low/moderate income apartment units at Maple Court Place,
- 28 = affordable units in the Shoots and Hattle buildings,
- 72 = affordable units at Arbor Ridge,
- 38 = units of fixed-site permanent supportive housing (PSH) in three locations,
- 7 = units of scattered site PSH were occupied in Goshen in PY 2021, for individuals with disabilities
- 33 = affordable one- and two-bedroom units, Hawks Arts and Enterprise Center

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

The City of Goshen's annual plan for program year 2023 will be carried out through the Planning office, Board of Public Works & Safety, Clerk Treasurer's office, and Mayor's office, with primary responsibility for administration through the Planning Office. The Planning office will work closely with Lacasa to manage and implement the housing activities. The planning neighborhood outreach activity will be implemented by Lacasa.

Plan implementation will occur in close cooperation with a number of local non-profit and institutional partners, including Lacasa, Region 2 Continuum of Care, Boys & Girls Clubs of Elkhart County, Council on Aging of Elkhart County, Elkhart County Clubhouse, Goshen Interfaith Hospitality Network, Maple City Health Care Center, Walnut Hill Early Childhood Center, Oaklawn Psychiatric

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

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

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

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

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

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

The City of Goshen Redevelopment Department conducted a citywide housing market analysis, published in May of 2022, to gather information on housing availability and affordability, housing conditions, and future housing development priorities. Current demand estimates indicated the Goshen housing market was underserved. Looking at current and projected demand, it was estimated that the local market needs approximately 4,537 new housing units, which is a 33% increase, through 2030 (2,466 rental and 2,017 owner-occupied). It was also noted that there was a

need for more low/mod affordable housing units that could only be built with government subsidies to keep expenses lower and meet that demand. Information from the analysis is being used to identify general strategies to address housing needs and future developments.

### **Discussion:**

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



## Program Specific Requirements

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

#### **Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)**

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

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

#### **Other CDBG Requirements**

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

The overall benefit to persons of low and moderate income will be calculated based on a single program year, PY 2023.

The Federal appropriation was enacted at the time the 2023 annual plan was developed, the budget is based upon receipt of the actual formula allocation.

## Attachments

### Citizen Participation Comments

#### Citizen Participation Overview and Detailed Comments

##### 2023 Annual Action Plan: Goshen, Indiana

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

Input for the 2023 Annual Action Plan was obtained through the following:

- Public hearing for current plan review and input for upcoming plan, January 20, 2023;
- Invitation to Continuum of Care requesting input on 2022 Annual Action Plan and submittal timeline, February 23, 2023;
- Public comment period for draft 2023 Annual Action Plan, March 14, 2023, through April 12, 2023;
- Public hearing to receive input on draft 2023 Annual Action Plan and current plan review, March 20, 2023;
- Public meeting to authorize submittal of 2023 Annual Action Plan, April 17, 2023;

A public hearing was held on January 20, 2023, to review the current program year and request input for the upcoming plan. Nine (9) individuals were in attendance, with seven individuals representing six local agencies. One of those in attendance was an interested community member, a Goshen College professor, who was gathering information on the grant and how to educate her students on policy. Comments received during this public hearing affirmed the current practices and use of CDBG funds. Notice of this public hearing was published in the Goshen News on January 12, 2023, and posted on the City's calendar and CDBG website on January 9, 2023.

The Indiana Region 2 Homeless Coalition (IR2HC), the local Continuum of Care, was notified during a meeting on February 23, 2023, of the 2023 Annual Action Plan completion timeline. The IR2HC is a group of public and private agencies who meet bi-monthly to coordinate and discuss services to address and prevent homelessness in Elkhart County and Region 2. A copy of the draft plan and notice of the public comment period and upcoming public hearing was provided to the Coalition via email on March 13, 2023.

The draft 2023 Annual Action Plan, notice of the public comment period and upcoming public hearing was distributed to the broad CDBG contact list, consisting of more than 100 individuals and organizations on March 13, 2023.

Notice of public hearing and notice of availability of the 2023 Annual Action Plan was published in the Goshen News on March 13, 2023, with the plan available for review on March 14, 2023, online at <https://goshenindiana.org/cdbg> and at the Goshen Planning Office.

A second public hearing was held on March 20, 2023, as part of a Goshen Common Council meeting, to provide opportunity for input for the draft 2023 Annual Action Plan and again review the current program year. Prior to the public hearing, the link to the draft plan, along with a notice of public hearing and notice of availability of the draft plans was provided to the regular Council distribution list, along with a summary of the proposed CDBG priorities, budget, and an overview of the current program year 2022.

Those in attendance at the March 20, 2023, public hearing were: Mayor Stutsman, the Deputy Mayor, seven Council members, six City of Goshen department heads and staff, members of the media and approximately ten (10) community members. During the public hearing, there were no comments received.

A final public meeting was held April 17, 2023, at a regular Goshen Common Council meeting, to authorize submittal of the 2023 annual plan, with Mayor Stutsman, seven Council members, Council youth advisor, multiple City department heads and staff, and approximately twenty (20) community members attending. At the Council meeting, the Community Development Specialist explained the HUD allocation has been received and the plan can be submitted upon approval. There were no questions regarding the Annual Plan from the Council, City staff or community members. There was one question from Council about the clause regarding excessive force in the HUD Certifications that was discussed. Council unanimously agreed to authorize the submittal of the 2023 CDBG annual plan.

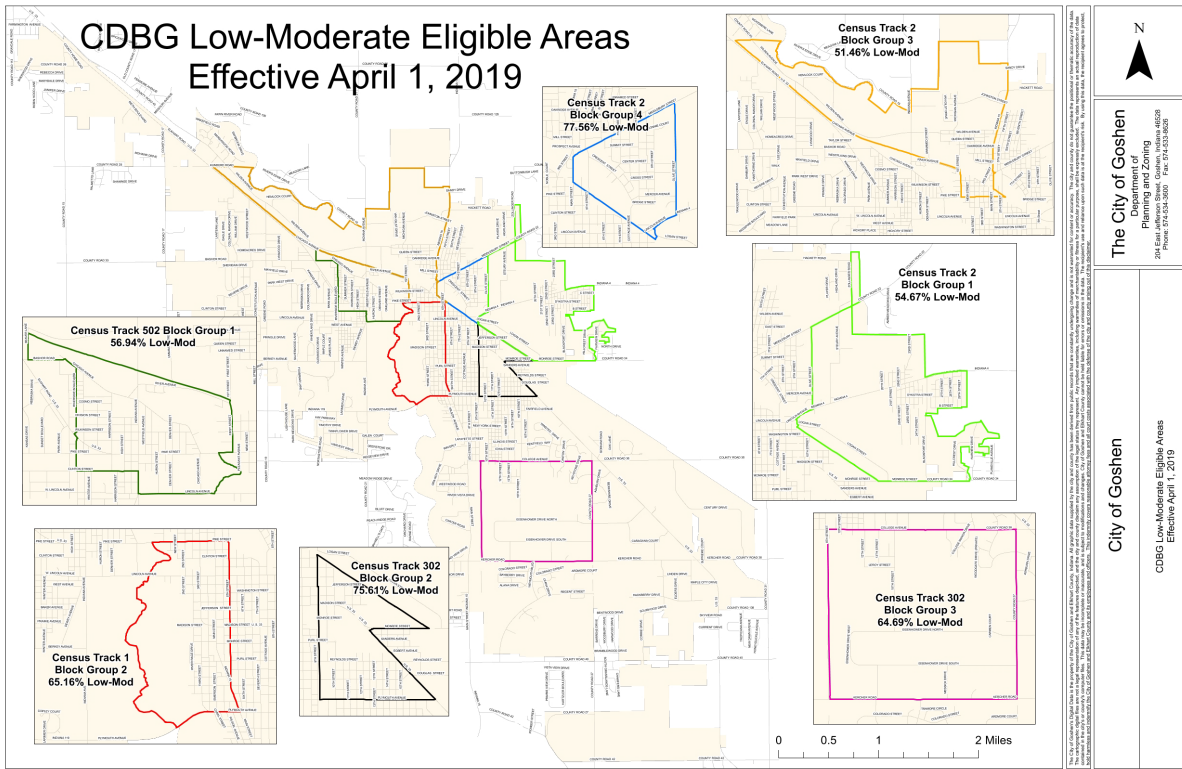
## Grantee Unique Appendices

### GRANTEE APPENDICES

City of Goshen

March 10, 2023

1. Map of Income-Eligible Census Block Groups
2. Proof of Publication
  - a) January 20, 2023, Public Hearing
  - b) March 20, 2023, Public Hearing & 30-day Public Comment Period - *TBD*
3. Additional Required Info Not Covered in E-Con



# Proof of Publication

<b>COPY</b>
Ad # 1810128

STATE OF INDIANA,  
Elkhart County, } ss:

**Notice of Public Hearing**  
City of Goshen  
CDBG Annual Action Plan for Program Year 2023

The City of Goshen is preparing the Community Development Block Grant (CDBG) Annual Action Plan for Program Year 2023 (July 1, 2023, through June 30, 2024) and is soliciting public input. The following were identified as priority needs and specific objectives for community and neighborhood development in the City of Goshen for the CDBG Five-year Consolidated Plan (2020-2024):

- Housing Opportunities**
  - Improve owner-occupied housing through rehab
  - Increase quality of rental housing
  - Increase transitional housing options
  - Reduce housing cost burden through higher wage job opportunities and job training
  - Provide permanent supportive housing for chronically homeless
  - Support affordable housing creation and preservation
  - Provide emergency shelter for homeless individuals and families
  - Expand housing options and assistance
  - Maintain and facilitate use of Housing Choice voucher program
- Access to Services**
  - Increase access to affordable healthcare
  - Increase services for mental health
  - Support programs for youth
  - Increase access to affordable childcare and early childhood education
  - Support services for elderly and the disabled
  - Support public transportation
  - Provide emergency shelter for homeless individuals and families
  - Provide permanent supportive housing for chronically homeless
  - Support counseling/advocacy for underserved populations
  - Increase access to substance abuse prevention and treatment
  - Support life skill development, including job training
  - Support nutrition programs and food assistance
- Neighborhood Revitalization**
  - Improve owner-occupied housing through rehab
  - Remove blighted residential properties
  - Address issue of vacant/foreclosed houses
  - Increase quality of rental housing
  - Support public infrastructure projects
  - Repair/replace existing sidewalks
  - Support neighborhood parks

For Program Year 2023, the City of Goshen expects to fund program activities in the following areas: public services, owner-occupied housing rehabilitation, multi-unit housing, homeownership assistance, program planning and program administration.

The City will hold a public hearing to review Program Year 2022 and to solicit input for the 2023 Annual Plan on Friday, January 20, 2023, at 9:30 AM in the Annex Building Conference Room at 204 E. Jefferson Street. Non-English speaking persons and others needing special assistance to participate in the hearing process should contact the City as soon as possible.

January 12 hepaxip

NEWS is a daily  
ed in the City of  
e annexed true copy  
cutive week as follows:

January 12, 2023

*Kristine F. Erb*  
\_\_\_\_\_  
Kristine F. Erb

Subscribed and sworn before me this day of **January 12, 2023**

*Angela S. Kulczar*  
\_\_\_\_\_  
Angela S. Kulczar Notary Public

\$84.46

My commission expires February 04, 2027  
Commission # NP0718334

The Goshen News  
114 S. Main St., Goshen, IN 46526  
ID # 82-2664009



# Proof of Publication

<b>COPY</b>
Ad # 1819505

**Notice of Public Hearing and Notice of Availability of Annual Action Plan for Program Year 2023  
City of Goshen  
Community Development Block Grant (CDBG)**

The City of Goshen's CDBG Annual Action Plan for Program Year 2023 has been prepared and is available for public review and comment beginning March 14, 2023. The plan is available on the City website at [www.goshenindiana.org/cdbg](http://www.goshenindiana.org/cdbg).

For program year 2023, the City of Goshen expects to receive an allocation of \$267,010 in CDBG funds. This allocation will be combined with miscellaneous income of \$7,000 and \$78,000 in prior years resources for a total budget of \$352,010.

The proposed use of CDBG funds for program year 2023 is as follows:

1. <b>Public Service Grants</b> - Provision of services to low- and moderate-income households and persons City-wide	= \$47,000
2. <b>Owner-occupied Rehabilitation</b> of homes occupied by low- and moderate-income households through loans, grants and deferred payment loans City-wide	= \$68,010
3. <b>Multi-Family Housing Rehabilitation</b> - a multi-unit project to create and preserve affordable housing	= \$190,000
4. <b>Planning, general administration, environmental reviews, and audit</b>	= \$37,000
<b>Total</b>	<b>\$352,010</b>

Comments may be submitted to Theresa Cummings, Goshen City Planning, 204 E. Jefferson Street, Suite 4, Goshen, IN, 46526; (574) 539-9370, [theresacummings@goshencity.com](mailto:theresacummings@goshencity.com) on or before 30 days after March 14, 2023, and no later than April 12, 2023. A summary of comments and responses will be submitted to HUD.

The City will hold a public hearing on the proposed 2023 Annual Action Plan on Monday, March 20, 2023, at 6 pm during the City Council meeting in the City Council Chambers, at the Goshen Police and Courts Building, 111 E. Jefferson Street, Goshen. The Goshen Police and Courts Building is handicapped accessible. Non-English-speaking persons and others needing special assistance to participate in the hearing process should contact the City as soon as possible. A link to access this meeting will be posted on the City's website at <https://goshenindiana.org/calendar>.

The public hearing will include a review of the proposed 2023 Annual Action Plan, a review of the current 2022 program year and opportunity for citizen comment.

Jeremy P. Stutsman, Mayor  
City of Goshen  
202 S. 5th Street  
Goshen, IN 46526  
Phone 574-539-8621  
TTY 574-534-3185#85

March 13 - hspajp

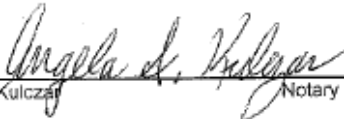
STATE OF INDIANA,  
Elkhart County, } ss:

published in the City of  
at the annexed true copy  
consecutive week as follows:

**March 13, 2023**

  
Anna Kovalenko

Subscribed and sworn before me this day of **March 13, 2023**

  
Angela S. Kulczar, Notary Public

**\$71.46**

My commission expires February 04, 2027  
Commission # NP0718334

The Goshen News  
114 S. Main St., Goshen, IN 46526  
ID # 82-2664009



Annual Action Plan  
2023

ADDITIONAL REQUIRED INFO NOT COVERED IN E-CON  
CDBG Annual Action Plan, Program Year 2023  
May 12, 2023

Required Elements of 24 CFR §91.100 and §91.200(b)

*1) The City did not include consultation and coordination information and documentation with Broadband internet service providers, organizations engaged in narrowing the digital divide.*

The following information, originally included in the 2020-24 Consolidated Plan, has been updated for the 2023 Annual Action Plan:

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

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

From the 2020-24 Consolidated Plan:

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

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

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

Based on information reviewed in January 2023 at broadbandnow.com, fiber, satellite and 5G Internet are listed along with cable and DSL as internet types available in Goshen, with 22 internet providers, 14 offering residential service and 90.2% broadband coverage. The 2021 ACS 5-year estimates indicate 10,727 households out of 12,418 total households (86.4% of total households) have a broadband internet subscription, and that 11,300 households out of 12,418 total households (91% of total households) have a computer. Of those with a computer, 86.8% have a broadband internet subscription.

Surf Internet, a local broadband internet provider, has a memorandum of understanding with CDBG Sub-Recipient, Lacasa, to provide free internet and whole house WI-FI systems for a fifteen year period to residents at several of its low/mod apartments buildings; including 12 units at the Hattle House Apartments, 4 units at 409 E. Madison Street, and 7 units at 317 Arbor Court. They are working on agreements for additional locations. Surf Internet is also a part of the Affordable Connectivity Program through the FCC, to help low-income households gain access to high-speed internet regardless of income and to help them pay for internet service and connected devices.



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

From the 2020-24 Consolidated Plan:

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

Based on information reviewed in January 2023 at broadbandnow.com, fiber, satellite and 5G Internet are listed along with cable and DSL as internet types available in Goshen, with 22 internet providers and 14 offering residential service. According to information reviewed in January 2023 at inmyarea.com, internet coverage by type for Goshen is 57% fiber, 76% cable, 92% DSL, 100% fixed wireless, and 100% satellite.

At the common council meeting on March 6, 2023 several broadband internet providers were in attendance to talk about progress and projects for installing internet cables for coverage of Goshen residents. Surf Internet stated that every Goshen resident in a project area was notified at least seven times through door hangers and letters. They installed underground internet cables for approximately 6,000 households in Goshen in one year, and have no further expansion plans except to do two more neighborhoods in 2023 as requested by the residents. Frontier has also used yard signs and door hangers to reach residents. Frontier reported they started work in August 2022 to reach 13,500 households in the Goshen area, and City of Goshen will have 100% coverage. The Mayor mentioned that AT & T will be another provider coming thru Goshen next year offering additional services.

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*2) The City did not include consultation and coordination information and documentation with Resilience agencies whose primary responsibilities include the management of flood prone areas, public land or water resources and emergency management agencies.*

The following information, originally included in the 2020-24 Consolidated Plan, has been updated for the 2023 Annual Action Plan:

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

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

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

As outlined in Resolution 2019-19, *A PROPOSAL FOR A SPECIAL RESOLUTION TO REDUCE CARBON EMISSIONS, INCREASE ENERGY EFFICIENCY AND RENEWABLE ENERGY USE, TO CREATE A CLIMATE CHANGE-RESILIENT CITY OF GOSHEN MUNICIPAL GOVERNMENT (HEREINAFTER REFERRED TO AS THE CITY OF GOSHEN) THAT WILL PROTECT THE FUTURE MEMBERS OF OUR COMMUNITY*, adopted April 23, 2019:

- *The Purdue Climate Change Research Center has determined that under continued business-as-usual "no action" carbon emissions, the Midwest should expect increased risks to public health, infrastructure and agriculture due to increased heat wave intensity and frequency, more extreme*

*droughts, increased heavy rain events and flooding, decreasing agricultural yield, and degrading air and water quality.*

- *The average temperature trend analyses from NASA Goddard Institute for Space Studies Surface Temperature Analysis show significant average temperature rise.*
- *The American Meteorological Society has declared there is unequivocal evidence of a changing climate since the 1950s.*
- *The American Meteorological Society has also determined that the dominant cause of the warming is due largely to the burning of fossil fuels.*
- *Numerous respected agencies and organizations including the American Lung Association, the National Academy of Sciences, and the Department of Defense Quadrennial Defense Review have determined that climate change is a serious risk to life, a threat multiplier, and a threat to national security.*
- *Localized risks to Hoosiers affecting human health, infrastructure and agriculture have included costly and dangerous extreme heat and drought conditions (2012), record-breaking rains and subsequent floods (2015 and 2018), and overall chaotic weather extremes.*
- *In 2008, 82 of Indiana's 92 counties were declared Presidential disaster areas due to winter weather, severe storms, and flooding, and incurred over \$1.9 billion in damage to public infrastructure, housing, and agriculture.*
- *On February 21, 2018, the Elkhart River reached record flooding levels of 12.49 feet, affected 250+ structures, caused several areas of our community to be evacuated, public safety mobilized and performed dozens of water rescues, 3 of the city's 5 river crossings were closed and resulted in a State of Emergency.*
- *In February 2019, the Community of Goshen experienced the coldest record days with wind chills reaching -58°F. Creating potentially deadly conditions for our homeless residents, causing water pipes to burst, and forcing several businesses, nonprofits, schools, and the City Government to close.*
- *Extreme weather and temperature changes associated with climate change, cause accelerated damage to Goshen's infrastructure of roads and paths, and to our water utilities.*

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

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

In September 2019, the City of Goshen established a Department of Environmental Resilience, and in July 2021, the City of Goshen adopted a Climate Action Plan for Government Operations, which "is the City's first attempt to reduce its impact on the global climate crisis. This plan is also an attempt to curb the climate change impacts that threaten the City and local community. At its heart, this plan is offered as a map toward equity for all of Goshen's residents, now and into the future, human and non-human alike. Seeking a more fully humane community is in the deepest interest of all."

During 2020-22, City staff worked with Christopher Burke Engineering, LLC, to draft a Flood Resilience Plan, which was adopted in July of 2022. Per the Executive Summary, the "flood resilience plan identifies smart growth strategies to improve flood resilience in the City of Goshen. The approach is two-pronged. The first uses land-use planning policies to direct growth, economic development, and capital improvement projects to

areas that are less vulnerable to flooding. This will help to prevent the problem from spreading and getting worse. The second is to implement projects to protect the people and critical assets that already exist in the vulnerable flood risk areas.”

Goshen’s Stormwater Department completed a *Climate Change Vulnerability Assessment for Stormwater* in 2021, which includes a socio-economic profile (attached) that includes discussion of characteristics such as age, poverty, limited English proficiency, households without health insurance, disabilities, and education.

The City of Goshen will continue to assess the increased natural hazard risks associated with climate change and the vulnerability to these risks of housing occupied by low- and moderate-income households as CDBG plans are developed and implemented.

## 2. SOCIO-ECONOMIC PROFILE OF GOSHEN

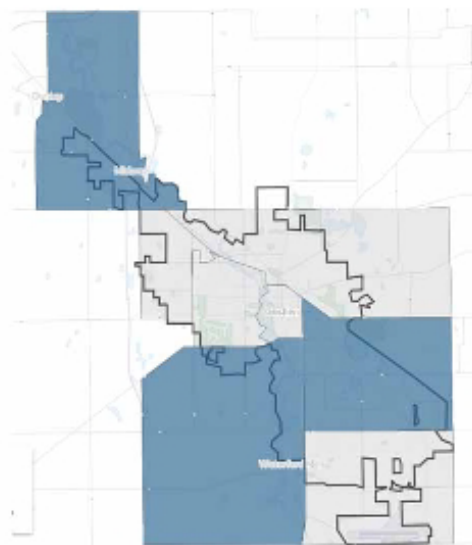
Table 1: Section Summary <sup>1</sup>			
Population by age range	Age	Income	
<p>Population by age range</p>	35.4	\$21,603	\$48,399
	Median age	Per capita income	Median household income

Goshen is a unique and diverse city—a multi-generational community home to peoples representing a variety of languages, ethnicities, religious practices, political views, educational achievement, economic situations, and jobs. It is this diversity that makes Goshen great.

Some of the characteristics of the community mark Goshen's strengths in an uncertain climate future while others reveal some of its vulnerabilities—the neighborhoods and peoples that will need additional

resources to adapt to this future in an equitable way. To fully understand how the City of Goshen is resilient or vulnerable to climate change, a deeper look at the community's socio-economic (social and economic) characteristics is needed. Using the *Neighborhoods at Risk* (Data Mapper, compiles 2018 American Community Survey data) tool from Headwaters Economics, nine characteristics were analyzed that help explain local vulnerabilities:

- A. Percent of population over 65
- B. Percent of population under 5
- C. Percent of community in poverty
- D. Percent of population with limited English proficiency
- E. Percent of population identifying as a Person of Color or Hispanic
- F. Percent of households without health insurance
- G. Percent of households without a car
- H. Percent of population with disabilities
- I. Percent of rental and mobile homes
- J. Percent of population without a high school diploma



**Figure 3: Blue Census Tracts:** Tracts in Goshen where the percentage of the population 65 years and older exceeds the national average of 15.2%.

*A Note On the Data:*

*A new census was conducted in the year 2020. At the time of writing, the new numbers were not yet publicly accessible.*

The American Community Survey periodically updates demographic data using survey methodology and the 2018 Survey numbers used in the analysis represent the best available data for Goshen.

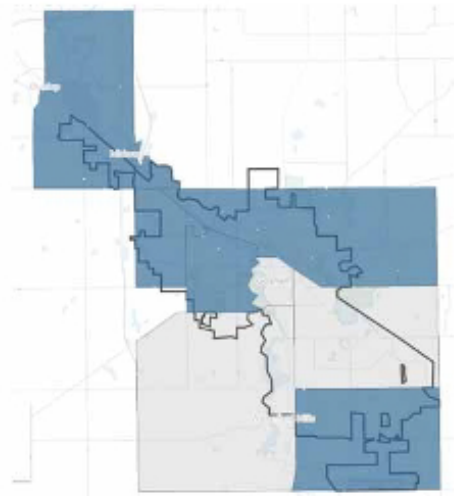
The size of census tracts in Goshen—the geographic unit available to display demographic data—are too large in area to understand clearly the finer detail of vulnerability distribution amongst distinct neighborhoods in Goshen. Census tracts also do not align with City limits. Thus, the following analysis should be considered as generalizations to guide thinking, but on-the-ground knowledge remains essential to thinking about equity in the vulnerability assessment and ongoing planning efforts.

### A. Percent of population over 65

As of 2018, the City of Goshen had 33,915 residents, 16% (5,675) of which were 65 years or older.<sup>2</sup> This is higher than the U.S. national average for residents over 65, which is 15.2%. Of this population, approximately 1,037 (3.1%) are 80 years or older. Goshen is home to many services developed specifically for elderly populations. Notably, Greencroft Communities located along College Avenue is one of the largest elderly residential housing facilities in the region. Several other neighborhoods have been specifically designed with retirement age persons in mind.

This figure is important because elderly populations are at increased risk of compromised health related to environmental hazards and climate change. In fact, age is the single greatest risk factor related to illness and death from extreme heat<sup>3</sup> and the elderly are more likely to have pre-existing medical conditions or compromised mobility, which reduces their ability to respond to extreme heat and extreme weather events<sup>4</sup> (which are both likely to become more frequent due to climate change). Finally, the increased likelihood of chronic disease,<sup>5</sup> combined with the fact that older adults are more susceptible to air pollution, which is expected to become worse due to climate change, makes them a uniquely vulnerable population.<sup>6</sup>

All of these factors combined mean that the elderly require unique and/or additional services compared to younger residents. As such, understanding the community's age profile helps determine the appropriate types of services and resources needed to ensure all of Goshen's residents can survive and thrive in a climate-altered future.



**Figure 4:** Blue Census Tracts: tracts in Goshen where the population under the age of five exceeds the national average of 6.1%.

### B. Percent of population under 5

As of 2018, 6.9% (2,346) of the City of Goshen's population was under five years of age. This is just one-tenth of a percentage point higher than the national average of 6.8%.<sup>7</sup> The areas of Goshen with higher than average populations of children under the age of five are largely concentrated in the northwest section of the City. Note that at least one of these tracts lies mostly outside City limits, but can give a general sense that there may be more family housing units in that region.

Knowing what percentage of residents are under the age of five, and where they reside, is important because children's developing bodies are particularly sensitive to health problems and environmental stresses,<sup>8</sup> including those associated with climate change. Children also spend more time outside and have faster breathing rates than adults, so they are more at risk for respiratory problems related to things such as ground-level ozone, airborne particulates, wildfire smoke, and allergens;<sup>9</sup> all of which can be exacerbated by climate change. Moreover, because their immune systems are not fully developed, children are more susceptible to infectious diseases,<sup>10</sup> including those that spread during natural disasters.

Focusing efforts on reducing youth vulnerability makes

sense for many reasons, including the fact that childhood lays the foundation for lifelong health, meaning that poor health during childhood can significantly increase the likelihood of problems throughout adulthood.<sup>11</sup> With the rising cost of health care in the U.S., ensuring that Goshen has a healthy, productive community is pivotal to not only wellbeing but also social structure and the economy.

As the City seeks to ensure its youth are resilient to climate change, particular attention needs to be paid to youth that are living in poverty. Children living in poverty are less likely to receive high-quality health care, meaning that they may be especially sensitive to changes in climate and the ensuing health impacts.<sup>12</sup> Children living in poverty are also more likely to live in vulnerable areas, including areas that have poor air quality, limited transit options, and homes that are less resilient to changing weather patterns. As the City moves forward with building community-wide resilience, care must be taken to ensure that children, especially those in poverty, are prioritized.

### C. Percent of community in poverty

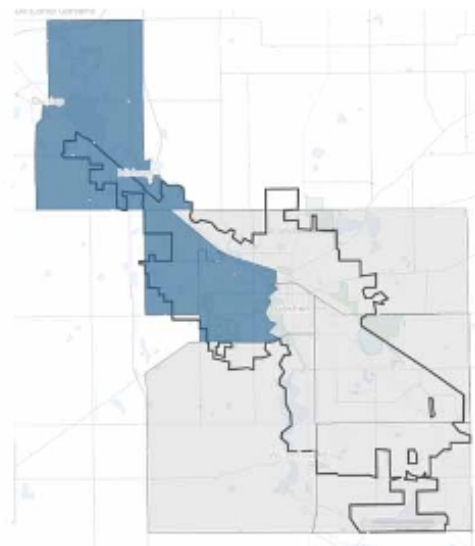
Poverty is typically defined using multiple factors including household income and the number of household members. In 2018, the City of Goshen had 1,197 families living in poverty. The U.S. Department of Commerce

Census Bureau calculated a total of 8,264 family units in Goshen for whom they determined poverty status in 2018. That makes the rate of families living in poverty 14.5% in 2018. This number is significantly above the U.S. national average of 10.1%.<sup>13</sup> Looking closer into these groups, data shows that in Goshen 13.1% of families with children live in poverty—well above the national average of 7.5%. Finally, 10.5% of the City's families are both living in poverty and a single mother household. That's more than double the national average of 4.5%.

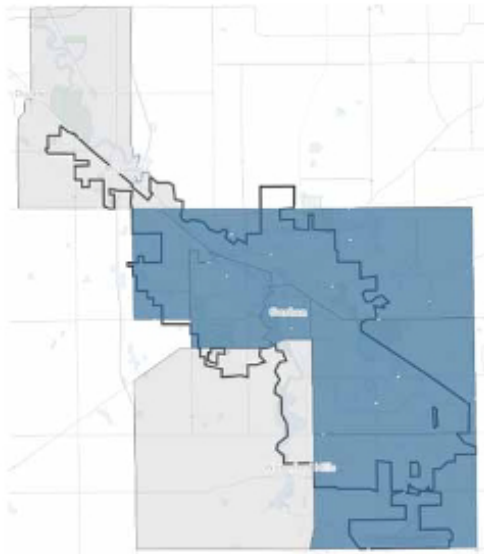
The City will look for updated numbers from the 2020 census as the Global Pandemic and its fallout may have significantly impacted these numbers. National trends could provide some insight on the expected impacts, but Goshen's heavy reliance on manufacturing may make for trends unique to the region. While the raw numbers for rates of poverty may have changed dramatically, the distribution of the populations more likely to be in poverty likely did not. The map of census tracts can thus still give a general sense of where the most economically vulnerable populations may live.

Understanding the percent and location of those living in poverty is critical because low income is one of the strongest predictors of compromised health as well as an individual's ability to recover from disasters.<sup>14</sup> Moreover, natural disasters disproportionately impact the poor because of things such as inadequate housing, social exclusion, a diminished ability to evacuate, lack of property insurance, and more acute emotional stress.<sup>15</sup> In addition, research has shown that low-income people are more likely to be overlooked during the emergency response period following a disaster.<sup>16</sup> Low-income populations are also more likely to live or work in areas with greater exposure to environmental hazards, including working in jobs that require outdoor labor.<sup>17</sup>

Income inequality within a community is also associated with poor health outcomes: residents in low-income neighborhoods tend to have higher incidences of asthma, depression, diabetes, heart conditions, and emotional stress compared to higher-income neighborhoods.<sup>18</sup> Low-income households also have to make lifestyle compromises to make ends meet, such as choosing unhealthy foods, less food, substandard housing, or delayed medical care.<sup>19</sup> Having limited income may also mean that it is simply too expensive to run fans, air conditioners, or heaters to manage indoor living temperatures, not to mention that many low-income



**Figure 5: Blue Census Tracts:** tracts in Goshen where the percentage of families living in poverty exceeds the national average of 10.1%.



**Figure 6:** Blue Census Tracts: tracts in Goshen where the percentage of persons who do not speak English well exceeds the national average of 4.4%.

residences are located in high crime areas, meaning that residents may feel unsafe opening their windows.<sup>20</sup> Finally, the poor are least likely to have health insurance, which further exacerbates their vulnerability to the negative health impacts associated with climate change such as deteriorating air quality, higher incidences of asthma, and increased allergens.<sup>21</sup>

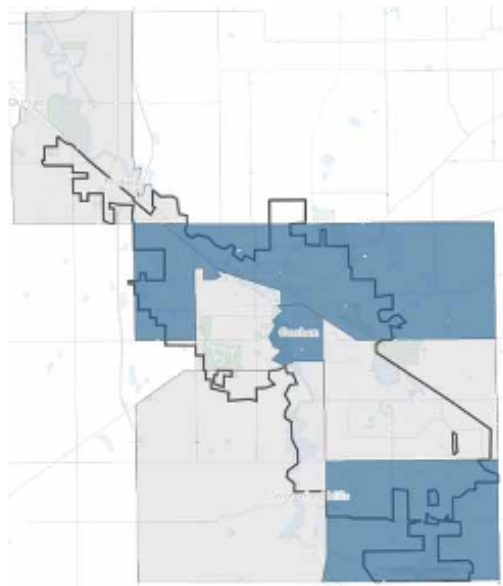
Goshen's rates of poverty being higher than the national average make these considerations all the more important. Lower-income areas tend to have the highest exposure to environmental harm and the least capacity to recover. With concerted effort, Goshen can work to be an exception to the trend that lower-income neighborhoods receive fewer climate mitigation efforts and slower and weaker emergency response in a disaster. Making resources accessible and incorporating vulnerability into emergency planning are important first steps.

#### **D. Percent of population with limited English proficiency**

Goshen's diversity of peoples makes for a dynamic City. According to the US Census Bureau, in 2018, 6.8% of the Goshen community "speak English 'not well'" (2,144 people). This is higher than the national average of 4.4%.<sup>22</sup>

Understanding the percentage and location of people with limited English proficiency is important because many, if not most aspects of life in the US require basic fluency in English. For example, knowing about and then accessing emergency services, learning about poverty reduction programs, or accessing health care all necessitate basic English proficiency. Research has found that limited English proficiency can:

- Limit a person's ability to effectively act during emergencies;<sup>23</sup>
- Make it harder to interact with agencies and access advisory information, thereby limiting the amount of support available to respond to and recover from disasters of all types;<sup>24</sup>
- Make it harder for people to get higher-wage jobs;<sup>25</sup> and
- Result in isolation from other segments of the US population, and social isolation can be a serious health risk.<sup>26</sup>



**Figure 7:** Blue Census Tracts: tracts in Goshen with a percentage of people identifying as a person of color or Hispanic exceeds the community median of 33.2% (the national average is 38.9%).

Because of these factors, the City must work to ensure populations with limited English proficiency have access to the information, tools, and resources they need to build resilience. In Goshen, this often means creating dual-language informational materials, but it also takes creative thinking about how to reach diverse populations and who the most effective messengers are.

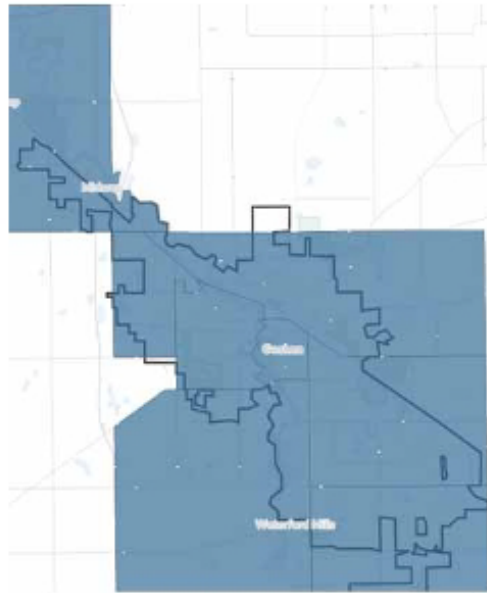
### E. Percent of population identifying as a Person of Color or Hispanic

As of 2018, 34.3% of the population in Goshen (11,639) identified as a person of color or Hispanic. This is lower than the national average of 38.9%. Looking in greater detail at a few key categories, 2.6% (891) identified as Black or African American, 3.7% (1,248) identified as two or more races, and 27.6% (9,372) identified as Hispanic or Latino.<sup>27</sup>

Looking to the next generation, the demographics of Goshen Community Schools (GCS) give some sense of the direction the community is heading. Of GCS's approximately 6,500 currently enrolled students, over 63% identify as a race other than white, non-Hispanic. Hispanic origin alone accounts for 56% of students—making them the largest single sub-group.<sup>28</sup>

This information is important because race and ethnicity strongly correlate with disparities in health, exposure to environmental pollution, and vulnerability to natural hazards, including climate-related natural hazards.<sup>29</sup> More specifically:

- Research consistently finds race-based environmental inequities across many variables, including the tendency for minority populations to live closer to noxious facilities and Superfund sites, and to be exposed to pollution at greater rates than whites.<sup>30</sup>
- Across races, the rates of preventable hospitalizations are highest among black and Hispanic populations. Preventable hospital visits often reflect inadequate access to primary care. These types of hospital visits are also costly and inefficient for the health care system.<sup>31</sup> Relative to other ethnicities and races, Hispanics and Black/African Americans are less likely to have health insurance but rates of uninsured are dropping for both groups.<sup>32</sup>
- Compared to other races, blacks have higher rates of



**Figure 8:** Blue Census Tracts: tracts in Goshen where the percentage of households without health insurance exceeds the national average of 9.4%.

infant mortality, homicide, heart disease, stroke, and heat-related deaths.<sup>33</sup>

- Hispanics have higher rates of diabetes and asthma, compared to other ethnicities.<sup>34</sup>
- Minority communities often have less access to parks and nutritious food and are more likely to live in substandard housing, all of which can negatively impact health outcomes.<sup>35</sup>
- Minorities tend to be particularly vulnerable to disasters and extreme heat events. This is due to language differences, housing patterns, substandard housing, community isolation, and cultural barriers.<sup>36</sup>
- Blacks and Hispanics, two segments of the population that are currently experiencing poorer health outcomes, are an increasing percentage of the U.S. and Goshen's population.<sup>37</sup>

Given these realities, it is important the City of Goshen ensures the effective integration of the needs, perspectives, and lived realities of its diverse population into efforts to enhance resilience. To this end, Mayor



Jeremy Stutsman (January 2016-present) has initiated a number of efforts to include more diverse voices in conversations about the City's work and future direction. These efforts include a number of citizen advisory councils and commissions including, but not limited to, the Community Relations Commission, Goshen Arts Council, Mayor's Environmental Advisory Committee, and Mayor's Latino Advisory Committee.

#### F. Percent of households without health insurance

As of 2018, an estimated 5,004 households within Goshen (15%) did not have health insurance. This is well above the national average of 9.4%. As apparent in Figure 8, all of the census tracts in Goshen have an uninsured rate that exceeds this national average.

Goshen's particular vulnerability in this regard means a number of services have developed over the years in an attempt to fill some gaps in available healthcare services. Maple City Healthcare, the Goshen Health Foundation, and The Center for Healing and Hope are a few organizations that work to provide lower-cost medical services to Goshen residents.

Researchers have found that those without health insurance often do not have a regular source of medical care which means they are more likely to use hospital emergency services for preventable conditions or standard needs.<sup>38</sup> About a quarter of uninsured adults have reported that they delayed or did not seek medical care due to the expected costs.<sup>39</sup> Many have also skipped medications and healthcare providers are less likely to prescribe medications to the uninsured in the first place.<sup>40</sup>

All of these consequences of being uninsured make Goshen's population less equipped to deal with health threats. Compromised sanitary conditions due to flooding, extreme heat, and increased air pollution are just a few health threats that residents may face in the future. Given the changing environment and the sensitivity of Goshen's population to health threats, the City needs to create systems and continue to support existing services that promote a healthier population with adequate health resources for all.

#### G. Percent of households without a car

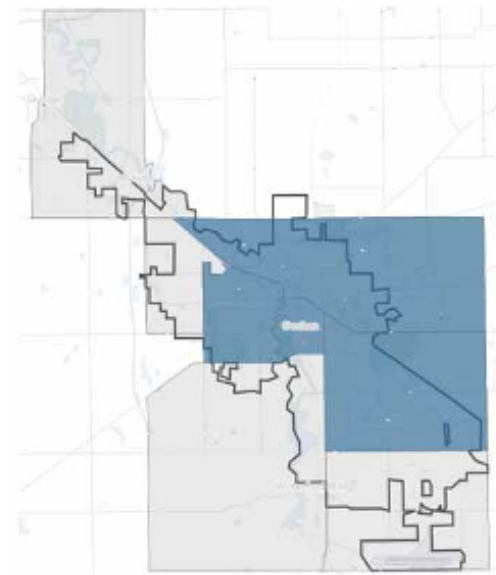
As of 2018, 1,342 households in Goshen did not own a car. That is 10.9% of all households as compared to 8.7% nationally.

In a small sized city like Goshen where public transportation options are limited, lack of access to a car creates a major vulnerability for a sizeable percentage of the City's households. The City is actively working with the Michiana Area Council of Governments (MACOG) to expand the region's public transportation system. The latest efforts include expansion into the northside of Goshen—an area that is currently underserved.

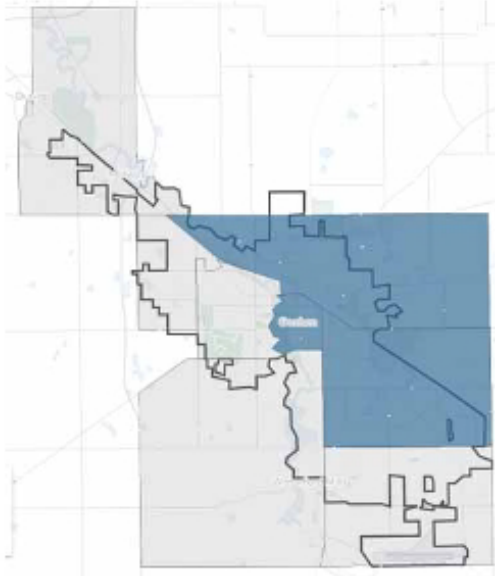
Research has shown that access to a car promotes greater financial stability as people are more likely to be employed and work higher paying jobs.<sup>41</sup> Vehicles can also be essential during emergency situations. For natural disasters, heat waves, and other threats, cars give people the mobility to evacuate or seek safety and care within their community.<sup>42</sup>

#### H. Percent of population with disabilities

As of 2018, 4,416 residents in Goshen were living with some kind of disability. This represents 13.3% of the total population; a figure higher than the national average of 12.6%.<sup>43</sup>



**Figure 9:** Blue Census Tracts: tracts in Goshen where the percentage of households without a car exceeds the national average of 8.7%.



**Figure 10:** Blue Census Tracts: tracts in Goshen where the percentage of those living with disabilities exceeds the national average of 12.6%.

Disabled persons are subject to a series of health complications that are often significantly heightened due to environmental conditions. For example, limited mobility raises heat mortality,<sup>44</sup> as it can significantly delay and/or prevent effective evacuation during times of disaster. Extreme weather events can also disrupt one's ability to get medical treatment, which can be disastrous for those with compromised health. These are only some of the heightened vulnerabilities faced by people with disabilities.

Because of this, Goshen is determined to incorporate the needs of the disabled into attempts to create a more resilient community. This includes ensuring entities that service populations with disabilities (i.e., Courtyard Health Care, Greencroft, The Laurels of Goshen, Waterford Crossing, etc.) have adequate resources for responding to crises events.

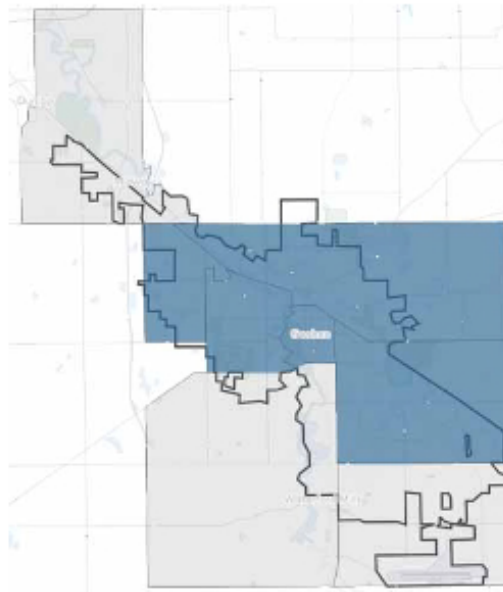
### I. Percent of rental or mobile homes

As of 2018, 44.9% of housing units in Goshen were rentals; an additional 10.7% were mobile homes.<sup>45</sup> This rate is

significantly higher than the national average (36.2% for rentals, 5.6% for mobile homes).

Understanding what percentage of the population owns a home is important because home ownership contributes to well-being and stability. Home ownership also improves mental health, including increasing self-esteem and creating a heightened sense of control over one's living situation and financial security.<sup>46</sup> On the flip side, the financial stress associated with losing one's home is heightened by people's attachment to place and their neighborhoods.<sup>47</sup>

In terms of renters, studies have repeatedly shown that renters pay a larger proportion of their income in rent; rental rates have increased over the past 25 years with no sign of abatement.<sup>48</sup> This financial burden is exacerbated by the fact that rental homes are typically not well maintained with conditions such as dampness, mold, and exposure to toxic substances or allergens heightened for those residing in rental units.<sup>49</sup> Because of this, renters may pay even more to heat, cool, or make their rentals more accommodating, further exacerbating the financial impact associated with renting.



**Figure 11:** Blue Census Tracts: tracts in Goshen where the percentage of rental housing units exceeds the national average of 36.2%.

Not explicitly shown in census data, another important factor impacting Goshen is sufficient affordable housing. Goshen's median home tax valuation for a single family, non-rental home is currently \$148,400.<sup>50</sup> Lack of available rental units and increasing costs of home ownership in Goshen pushes more and more people to substandard and overcrowded housing. Interrelated, people experiencing temporary or prolonged periods of homelessness are especially vulnerable during extreme heat and rain events. To decrease the vulnerabilities associated with inadequate and substandard housing, Goshen must work to address its lack of affordable and appropriate housing.

### J. Percent of population without a high school diploma

- As of 2018, 4,666 people age 25 or older in Goshen did not have a high school diploma (21.9%). This is significantly higher than the national average of 12.3%,<sup>51</sup> a troubling statistic since high school completion is a common proxy for overall socio-economic circumstances. In particular, lack of education is strongly correlated with poverty and poor health. For example:
- People without a high school degree are more than twice as likely to live in inadequate housing compared to those with some college education.<sup>52</sup>
- Thirty-eight percent of Americans without a high school degree do not have health insurance, compared to 10 percent with a college degree.<sup>53</sup>
- The rate of diabetes is much greater for those without a high school degree. Incidence of this disease is more than double the rate of those who have education beyond high school.<sup>54</sup>
- Binge drinking is most severe among those without a high school degree. This demographic group had the highest rate of binge drinking across all measured categories (such as income, race, ethnicity, or disability status).<sup>55</sup>

The high percentage of the population without a high school diploma requires special considerations for how information is communicated regarding disaster risks and response. Identifying which population segments are more likely to be without a high school diploma will help in creating better targeted community risk education and ensuring equitable disaster response.

### A Note on Vulnerabilities Faced by Goshen's Immigrant Community

The census data alone cannot fully describe the unique vulnerabilities within significant segments of Goshen's population. A notable part of Goshen's community profile is the immigrant community and the sizable undocumented population. Goshen is home to many first- and second-generation immigrant families—the majority from Mexico and other parts of Central America. Many of the vulnerabilities looked at in this section disproportionately affect immigrant families including a percentage of the community living in poverty, peoples with limited English proficiency, and those lacking health insurance, high school diplomas, and access to affordable, adequate housing.

For many, there are also the added stresses and barriers of life without legal documentation. Even if a person could afford to own a car for example, they may be unable to obtain a valid driver's license. Similar barriers exist for obtaining health insurance or securing a home loan.

A sizable portion of the community without legal documentation requires a few special considerations when considering climate mitigation and disaster response planning. First, there is the possibility that the census statistics undercount persons living with a particular vulnerability. Second, much work is needed to establish trust and work in collaboration with partners who are already serving immigrant populations. Hesitancy to work with government agencies creates barriers to climate disaster risk education, informed emergency response, and recovery efforts.

### Cumulative Socio-Economic Vulnerability

Combining the findings from each of the previous sections, a map was created denoting some of the most socio-economically vulnerable neighborhoods (Figure 12). This figure identifies all the Census Tract where the City of Goshen has higher than the national average for all of the following variables: people who have difficulty speaking English; the number of rental units; population that is uninsured; households who lack access to a car; children under 5 years and people over 65 years old; and people with disabilities.

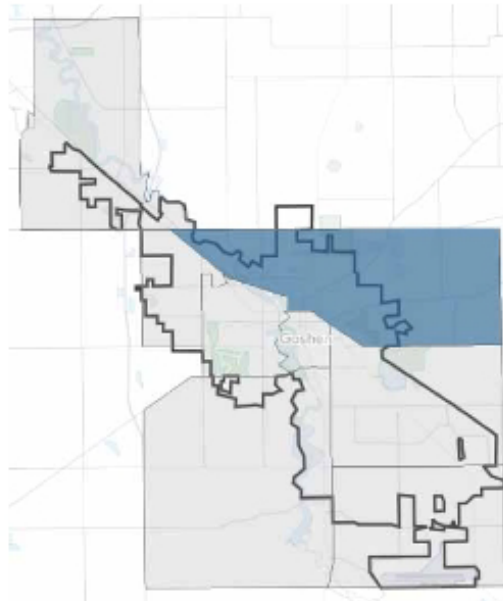
While the characteristics in this section give a window into Goshen's particular vulnerabilities and the area of the

City most impacted, they are limited. The United States' most accessible census tools are on a scale that does not necessarily make sense for the size of the community. For example, the census tract in the northeast corner of Goshen identified as the most vulnerable represents a large area that encompasses a wide variety of smaller communities ranging from wealthier suburbs to truly underserved neighborhoods. Thus, on-the-ground knowledge remains incredibly important. At this time, the above section offers a starting point, but as climate vulnerable areas are identified, more work needs to be done to understand the particular needs of residents in diverse neighborhoods.

For those new to the demographic data of Goshen, the above numbers may seem dramatic (i.e., a City-wide rental unit rate of 44.9%). It's helpful then to look at these numbers with some kind of context. How does the City of Goshen stack up with the rest of Elkhart County? Indiana? What about the rest of the Country? Figures 13 and 14 below put Goshen's vulnerability in a Local, State, and National context using the Center for Disease Control's (CDC) Social Vulnerability Index.

The CDC pulls US Census Bureau data for a census-tract level data set called the Social Vulnerability Index (SVI). The SVI greatly simplifies the process of demographic data gathering and the indexing methodology relates multi-variable markers of vulnerability into a single, comparable score based on extensive research on factors impacting vulnerability. The CDC developed the SVI as a tool specifically for community natural disaster planning and response for events like flooding and earthquakes.<sup>24</sup>

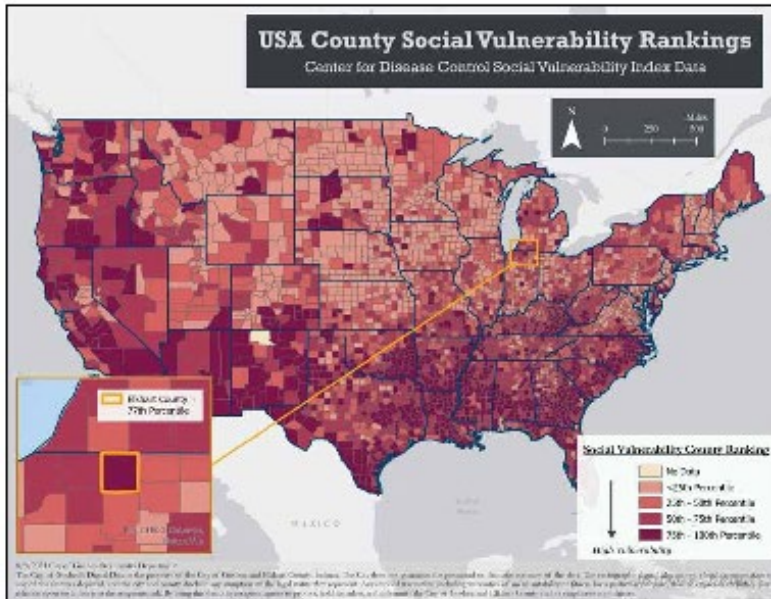
Looking at the broader context of socio-economic vulnerability in Goshen through the SVI, it becomes clear that overall Goshen may be considered fairly vulnerable. However, as observed in earlier analysis, this vulnerability is not necessarily distributed equally throughout the City. Northeast Goshen emerged as particularly vulnerable when looking at individual markers of social vulnerability and the SVI reemphasizes this point. The Northeast Goshen census tract falls in Indiana's 92nd percentile for vulnerability.<sup>25</sup>



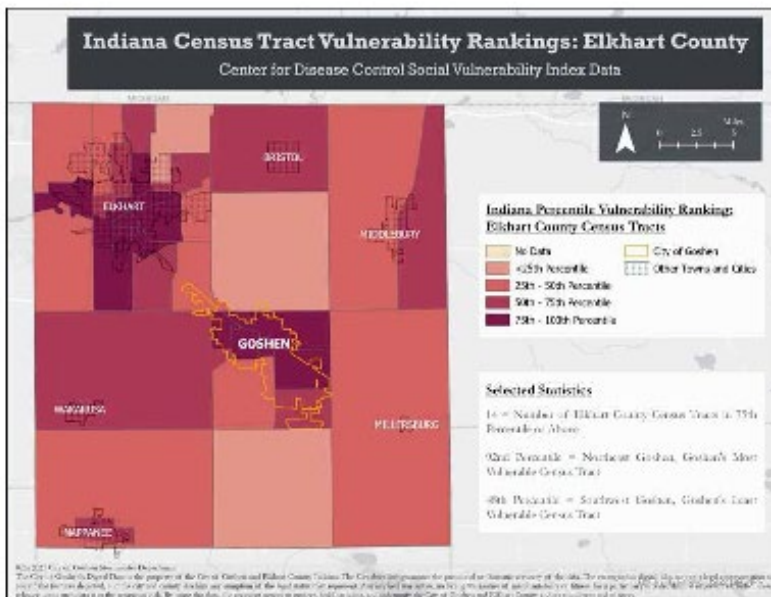
**Figure 12:** Census Tract within the City of Goshen that has the highest overall socioeconomic vulnerability. This map highlights a Census Tract with percentages higher than the national average for: people who have difficulty speaking English; the number of rental units; population that is uninsured; households who lack access to a car; children under 5 years and people over 65 years old; and people with disabilities.

It may be worth noting as well that a number of census tracts in Elkhart are even more vulnerable than Goshen's most vulnerable. Being downstream, the City of Elkhart directly benefits from Goshen's efforts to mitigate flooding. Goshen thus has a part to play in protecting people in those neighborhoods as well.

Evaluating social vulnerability is important because of the ways it exacerbates flood risks, damage, and recovery. Goshen's climate future holds far greater risk than ever before. In the next section we highlight our exposure to historic, current, and projected future changes in weather and climate.



**Figure 13:** The Center for Disease Control (CDC) Social Vulnerability Index data showing vulnerability percentile rankings in comparison to all counties in the United States. Elkhart County falls in the 77th percentile nationally for vulnerability factors.<sup>56</sup>



**Figure 14:** The Center for Disease Control (CDC) Social Vulnerability Index data showing vulnerability percentile rankings compared to all census tracts in Indiana. This map looks at Elkhart County census tract vulnerability as a percentile ranking across Indiana.<sup>57</sup>

## Grantee SF-424's and Certification(s)

### 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 75.

  
Signature of Authorized Official

6/20/23  
Date

Mayor  
Title

## 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 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) 2023 \_\_\_\_\_ [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.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

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

6/20/23  
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 CDBG-assisted 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.

  
\_\_\_\_\_  
Signature of Authorized Official

6/20/23  
\_\_\_\_\_  
Date

Mayor  
\_\_\_\_\_  
Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text" value="B-23-RU-19-0019"/>	
<b>State Use Only:</b>		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
<b>8. APPLICANT INFORMATION:</b>		
* a. Legal Name: <input type="text" value="Goshen, Indiana"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="35-6001045"/>	* c. UEI: <input type="text" value="B81FL8HTQJ23"/>	
<b>d. Address:</b>		
* Street1: <input type="text" value="202 South 5th Street"/>	<input type="text"/>	
Street2: <input type="text"/>	<input type="text"/>	
* City: <input type="text" value="Goshen"/>	<input type="text"/>	
County/Parish: <input type="text"/>	<input type="text"/>	
* State: <input type="text" value="IN: Indiana"/>	<input type="text"/>	
Province: <input type="text"/>	<input type="text"/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	<input type="text"/>	
* Zip / Postal Code: <input type="text" value="46528-3703"/>	<input type="text"/>	
<b>e. Organizational Unit:</b>		
Department Name: <input type="text" value="Community Development"/>	Division Name: <input type="text" value="Planning"/>	
<b>f. Name and contact information of person to be contacted on matters involving this application:</b>		
Prefix: <input type="text" value="Ms."/>	* First Name: <input type="text" value="Thonda"/>	<input type="text"/>
Middle Name: <input type="text"/>	<input type="text"/>	
* Last Name: <input type="text" value="Yoder"/>	<input type="text"/>	
Suffix: <input type="text"/>	<input type="text"/>	
Title: <input type="text" value="CDBG Administrator"/>		
Organizational Affiliation: <input type="text"/>		
* Telephone Number: <input type="text" value="574-537-3815"/>	Fax Number: <input type="text" value="574-533-9625"/>	
* Email: <input type="text" value="thondayoder@goshenacellty.com"/>		

Application for Federal Assistance SF-424	
<b>* 8. Type of Applicant 1: Select Applicant Type:</b> <input type="text" value="City or Township Government"/> <b>Type of Applicant 2: Select Applicant Type:</b> <input type="text"/> <b>Type of Applicant 3: Select Applicant Type:</b> <input type="text"/> <b>* Other (specify):</b> <input type="text"/>	
<b>* 10. Name of Federal Agency:</b> <input type="text" value="Department of Housing &amp; Urban Development"/>	
<b>11. Catalog of Federal Domestic Assistance Number:</b> <input type="text" value="14.218"/> <b>CFDA Title:</b> <input type="text" value="Community Development Block Grants/Rentitlement Grants"/>	
<b>* 12. Funding Opportunity Number:</b> <input style="background-color: yellow; color: red; text-align: center; width: 100%;" type="text"/>	
<b>* Title:</b> <input style="background-color: yellow; color: red; text-align: center; width: 100%;" type="text"/>	
<b>13. Competition Identification Number:</b> <input type="text"/> <b>Title:</b> <input type="text"/>	
<b>14. Areas Affected by Project (Cities, Counties, States, etc.):</b> <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>* 15. Descriptive Title of Applicant's Project:</b> <input type="text" value="Community Development Block Grant"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: TN-002	* b. Program/Project: [Redacted]
Attach an additional list of Program/Project Congressional Districts if needed.	
[Redacted]	<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
<b>17. Proposed Project:</b>	
* a. Start Date: 10/01/2022	* b. End Date: 09/30/2023
<b>18. Estimated Funding (\$):</b>	
* a. Federal	267,010.00
* b. Applicant	[Redacted]
* c. State	[Redacted]
* d. Local	[Redacted]
* e. Other	65,000.00
* f. Program Income	[Redacted]
* g. TOTAL	332,010.00
<b>* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?</b>	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on [Redacted]. <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
<b>* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)</b>	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach [Redacted] <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 18, Section 1001)</b> <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
<b>Authorized Representative:</b>	
Prefix: Ms.	* First Name: Gina
Middle Name:	[Redacted]
* Last Name: Leichy	[Redacted]
Suffix:	[Redacted]
* Title: Mayor	[Redacted]
* Telephone Number: 574-533-9222	Fax Number: 574-533-9740
* Email: mayor@goshencity.com	[Redacted]
* Signature of Authorized Representative: [Handwritten Signature]	* Date Signed: 6/20/23

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4045-0029  
Expiration Date: 02/28/2025

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**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to proscribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4501 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) 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 da-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. §§3501 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) 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).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1998 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
	Mayor
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Goshen, Indiana	6/20/23

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