



HOME-ARP Allocation Plan Bloomington, IN (PJ) Draft for Public Comment

Public Comment Period: March 6 – March 20, 2023

**Any comments should be submitted by 5 p.m. EDT on
March 20, 2023 to hand@bloomington.in.gov, or by
calling 812.349.3401.**



HOME-ARP Allocation Plan
Bloomington, IN (PJ)
Submitted to HUD March 24, 2023

Section One: Consultation

Describe the consultation process including methods used and dates of consultation:

Summary

As the local Participating Jurisdiction (PJ), the City of Bloomington conducted a significant amount of consultation specifically related to HOME-ARP. Over the last four months, more than 30 organizations or groups were consulted, along with the City holding two public hearings (at meetings of the Bloomington Redevelopment Commission) and inviting public comment at three separate meetings of the Bloomington Common Council. Finally, a required 15-day public comment period rounded out the consultation process that will be further described in the Public Participation section of this plan. The consultation process involved the PJ reaching out to the network of social service providers in the community/region, as well as following up on referrals from those agencies with recommendations of other partners needed for consultation. A list of organizations and individual with whom the PJ consulted are listed at the end of this section.

Background

Bloomington, Indiana is a regional hub with a population of 85,000 inside our city limits. We are home to Indiana University, with additional major employers including IU Health, Catalent and the nearby Naval Surface Warfare Center (NSWC) Crane. In 2021, a partnership was formed between the Community Foundation of Bloomington and Monroe County and the United Way of Monroe County, along with the South Central Housing Network and the Housing Insecurity Working Group, to create the Heading Home of South Central Indiana initiative. With \$5.1 in American Rescue Plan funds, the City of Bloomington and Monroe County government pledged to support this initiative in order to make homelessness rare, brief and non-repeating. This is being done through the implementation of [Heading Home Plan](#).

While drafting the Heading Home plan, local stakeholders formed three working groups to advance goals:

- **Data and Dashboard** – reviewed existing information to identify what data providers currently track and what is most significant to measure progress.
- **Map and Gap** – reviewed services associated with proximal causes of housing insecurity and identified gaps in services.
- **Promising Practices** – identified holistic best practices for housing security in place in other communities.

(Descriptions are from 2021 [press release](#) announcing the Heading Home plan.)

We believe the efforts of the multi-year Heading Home Initiative, which now has two full-time staff and an ongoing and dedicated Steering Committee of local stakeholders, serves as an important hub of activity from which activities benefitting HOME-ARP's four qualifying populations can be built upon moving forward. The PJ's intention is to compliment these efforts with our proposed activities.

List the organizations consulted:

The organizations on the chart below represent four months of outreach to the local community and its service providers who are stakeholders in area that interact with or work to serve those in the four qualifying populations. Feedback summaries from each consultation are provided in descriptions representing the main themes or areas a particular individual or group had feedback or questions on regarding use of the funds or how the HOME-ARP program worked generally. During this process, the PJ compiled an extensive record of notes on which these summaries are based.

<u>Consult Date</u>	<u>Organization</u>	<u>Org. Type</u>	<u>Method</u>	<u>Number of attendees (not counting PJ)</u>	<u>Feedback summary</u>
11/16/22	Bloomington Common Council	Allocation Plan invitation for Council and public comment #1 (Nine Council members and public)	Hybrid meeting	9	This presentation was ostensibly a housing report for the PJ and mentioned the allocation planning process and the invitation for public comment. General questions received about how it would be noticed to the public.

11/16/22	Bloomington Homeless Coalition	Volunteer group to help address homeless issues	E-mail	1	Not able to connect.
11/21/22	Heading Home of South Central Indiana, United Way of Monroe County, Community Foundation of Bloomington & Monroe County, New Hope for Families	Non-profit, community wide initiative to implement the Heading Home Plan: an effort to make homelessness rare, brief and non-repeating. New Hope for Families is a family shelter in Bloomington.	In-person	6	Case management; rental rehab, deposit assistance, eviction prevention, capacity expansion for Coordinated Entry (CE), continued staff support, mental health services. Ensure we are tying funds to housing outcomes.
11/22/22	IN Housing & Community Development Authority (IHCDA)	Statewide housing authority for Indiana	Virtual	1	Preference for alignment on rental housing projects, both existing and for general rental construction
12/13/22	City of Bloomington Affordable Housing Team	Local government team of various department officials tasked with advancing affordable housing in Bloomington	Virtual	9	Possible project assistance for rental housing projects coming online; helping fund eviction prevention and deposit assistance programming; rental rehab funding; also look at housing for veterans
12/14/22	Monroe County Veterans Service Office	Local government office to provide resources to local veterans	Virtual	1	Discussed issues of getting veterans connected with services; important role of VA. Also discussed importance of awareness of programming available to veterans.
12/20/22	Middle Way House	Organization (and shelter) that works to support survivors of domestic violence, sexual	Virtual	2	Interested in increased rental housing development, rental assistance. Transitional housing and capacity support. Substance abuse, eviction prevention, access to services

		assault, human trafficking and educate the community through outreach and prevention.			and outcome-driven. Discussed sustainability of supportive services funding and need for counseling services. Discussed a wide of range of supportive service needs that could help this qualifying population.
12/21/22	Bloomington Housing Authority	PHA serving Bloomington and Monroe County	Virtual	2	Discussed deposit assistance programming needs, as well as resident service coordination as it relates to housing stability. Discussed TBRA partnership and perhaps waiting on that. Eviction prevention also discussed.
12/23/22	Beacon & Coordinated Entry Staff	Anti-poverty organization aiding those in extreme poverty, aiding in hunger and homelessness support. Coordinated Entry (CE) staff are housed at this organization.	Virtual	2	Comprehensive discussion about support services, rental/supportive housing project upcoming, as well as need for expanded Coordinated Entry assessments, more "street" outreach, importance of navigation and case management ratios for the continuum of service that is needed from the point of assessment up to keeping someone housed.
1/3/23	Heading Home of South Central Indiana	Non-profit, community wide initiative to implement the Heading Home Plan: an effort to make homelessness rare, brief and non-repeating.	Virtual	2	Consultation check-in with HHSCI staff on allocation plan progress and feedback thus far.
1/9/23	City of Bloomington Community & Family Resources	Local PJ department focused on quality of life	Virtual	1	Discussed the process of fair housing since the PJ recently changed our staffing alignment for human rights and some fair

	Department/Fair housing	through programs and services designed to engage residents in service and participation in government. Resource center for safe and civil city efforts, local volunteer network, health initiatives, heritage culture and diversity celebrations, and staffs a number of citizen commissions. Dept. staff also helps manage fair housing policy.			housing activity. Primarily discussed issues for those in supportive housing that might have accessibility issues, and the importance of fair housing in terms of the PJ's ability to investigate fair housing complaints through our City staff.
1/9/23	City of Bloomington Legal Department/Fair housing	Local PJ legal department. Dedicates a portion of a staff attorney's time to fair housing issues.	Virtual	1	Discussed the importance of the legal aspects of fair housing policy and the need for the City to continue tracking information. Also to be sure our contract language, etc. follows fair housing policies following a change in the structure of how the PJ conducts practice on fair housing.
1/9/23	Bloomington Police Department Downtown Resource Officers (DROs)	Department officers who engage with those experiencing homelessness and others who frequent downtown	Virtual	2	Discussed difficulty of tenants determined to be high-risk to get housing and how that leads to other problems. Stressed the importance of "street" outreach and medical services, as well as the idea of keeping the scope of what HOME-ARP does narrow to be intentional about services

		Bloomington and area parks.			so they level provided can be robust. Thoughts are that the very basic provision of service help make connections and keep people engaging with one another. Also discuss reunification services for those who might be from other places.
1/9/23	Jack Hopkins and CDBG recipients 2021-2022	Non-profit social service agencies receiving funds from the City of Bloomington's Jack Hopkins Social Service Program	E-mail	30	E-mail was sent to organizations who have received funding over the past three years asking for input on plan and raising the question: "What have you observed to be the greatest gap or unmet needs in services for individuals at risk of our currently experiencing homelessness in Bloomington?"
1/10/23	Community Group (Meeting One)	Group of local elected officials and non-profit staff who originally gathered to discuss eviction prevention during the COVID pandemic	Virtual	7	Case management is a gap - "shelter to housing" gap was discussed. Supportive services discussed: deposit assistance, medical expenses, childcare, moving expenses.
1/10/23	HealthNet	Network of community-based health centers and support service programs.	Virtual	2	Discussion on need for immediate medical care/triage and expanded capacity for "street" outreach and medical professionals who can assist those experiencing homelessness. They are working on establishing three clinics in the Bloomington community. Hearing an overwhelming need for for medical support, and funding is running out in Spring 2023.

					<p>Clients need help with medications to remain stable until they're able to receive longer-term treatment. Feeling that housing coordination is not as robust as it could be because of the lack of service coordination/capacity.</p> <p>"Blended" street outreach model would be great between various agencies.</p>
1/10/23	Community Justice & Mediation Center (CJAM)	Organization designed to promote a civil and just community through mediation, education and restorative justice	Virtual	1	<p>Had discussion about overall ARPA spending and appropriations in Bloomington community. Also discussed needs for rental assistance and eviction prevention services.</p>
1/11/23	Bloomington Common Council	Allocation Plan invitation for Council & public comment #2 (Nine Council members and the public)	Hybrid meeting	9	<p>Questions from council members about public noticing and general process for funding.</p>
1/12/23	Wheeler Mission	Provides temporary shelter to homeless men in Bloomington as well as short term and long term addiction recovery programs	In-person	3	<p>Focus on outcomes and barriers to housing (recidivism, preparation for housing). Discussed reunification services and the possible development of a health clinic at Wheeler. Case management would help for connection in services. They have a need for case management staff. While mental health services are important - expense is an issue. On substance abuse, one thing they find is follow up and ongoing case management.</p>

					Identified some caseworker needs and discussed numbers.
1/12/23	South Central Housing Network	Regional Continuum of Care network	Virtual	19	Presented outline of plan to this group, which is the regional Continuum of Care coalition. The group gave an update on the Point in Time (PIT) count for this year. Also discussed veteran homelessness statistics. Input was mainly on logistics of HOME-ARP (note here is that a number of those present were also part of separate, individual consultation meetings).
1/13/23	Stone Belt	Regional agency serving clients with developmental disabilities and their families	Virtual	2	Client support is critical for those who are most at risk - need coordination assistance or are at risk for exploitation. Affordable housing is very hard to find. Emphasized a need for supportive services to help people access benefits - not just those with disabilities. Discussed financial instability/insecurity as an additional risk factor.
1/13/23	Greater Bloomington Chamber of Commerce	Organization promoting quality of life in the community through pursuit of new business	In-person	1	Discussion to discuss how the business community interacts and assists those in the qualifying populations. Discussion focused on mental health and the need for increased "street" outreach services. Discussed how many of those in QPs are unhoused, how they are assessed and what the service gaps are. Important to help with immediate outreach on the street. Expressed importance of the safety of everyone involved (business, those in QPs and

					other residents of Bloomington).
1/13/23	Centerstone	Non-profit organization offering a range of services, including addiction, psychiatric, counseling and housing services.	Virtual	2	Discussed the importance of supportive housing and security of residents and importance of maintaining stable housing. Permanent supportive housing model says that everyone gets services whether or not they're in treatment. They are largest provider of mental health service, but follow-up after can be difficult without ongoing case management. Asked about funds to rehab existing rental/PSH housing units. Pretty comprehensive discussion about service provision financing and gap for case management.
1/16/23	New Leaf, New Life	Organization to address the unmet needs of people incarcerated or formerly incarcerated individuals.	E-mail response to PJ Jack Hopkins email	5	Responded identifying five major needs: 1. The community needs and organization that will take the lead in assisting individuals with applying for and obtaining Social Security Disability Insurance (SSDI); 2. Transitional/sober living units; 3. Community-Based Crisis Resource Centers (CRCs); 4. Community-Based Residential Facilities (CBRFs) that would include supported apartments; 5. Increased number of local counseling and addiction treatment facilities that provide inpatient care.
1/16/23	Courage to Change Sober Living	Housing organization dedicated to providing housing for sober	E-mail response to PJ Jack Hopkins email	1	In need of more housing for men and women that would be supportive rental housing in Bloomington (due to expense and availability). Also expressed feedback that deposit

		living. Currently has four houses.			assistance, utility assistance and application fees would help, as would eviction prevention services and incentives to landlords to rent to folks with evictions or felonies.
1/17/23	Community Group (Meeting Two)	Group of local elected officials and non-profit staff who originally gathered to discuss eviction prevention during the COVID pandemic	Virtual	4	Help with rental assistance efforts, moving costs were discussed again. Need for case management in supportive housing to maintain sustained attention.
1/18/23	Amethyst House	Organization providing residential and outpatient services for people with drug and alcohol addiction.	E-mail response to PJ Jack Hopkins email	1	Discussed importance of serving population that is experiencing substance abuse disorder through case management. They are a community partner with a number of agencies to encourage recovery, provide employment opportunities and find stable housing when able.
1/24/23	Boys & Girls Club of Bloomington	Local non-profit providing youth services	Virtual	1	Discussed the importance of childcare services for those in Qualifying Populations (QPs). Social worker/case management is needed at all three of their locations to assist families who might otherwise be or are at-risk of homelessness but for the childcare they receive through BGCB. Gave statistics to highlight number of families that could be homeless.
1/27/23	Community Health/Wellness	Stakeholder meeting to help coordinate	In-person	1	Need for navigators to provide access to services in the social services network in

		community wellness through social service navigation			Bloomington. The physical location of navigators is important, but also important to think logistically about where they would be employed if not already built into an organization.
2/6/23	City of Bloomington Redevelopment Commission (oversight commission for PJ Housing & Neighborhood Development Department)	HOME-ARP Public Hearing #1 (Five Commissioners and the public)	Hybrid meeting	5	Commission members asked about hard cost eligibility for rehab of homes (not rental), as well as how we might strategize to maximize the amount to help the community overall. Thoughts also shared that funds should be spent as soon as possible as opposed to stretching funds out or waiting for a period of time to begin expenditure after plan approval. Discussed further emphasis of community partners in housing security, as well as providing direct assistance (security deposits, utility deposits, safety net money). No additional public comment was received.
2/6/23	Poverty & Navigating Health & Social Services Meeting	Local stakeholder group with a mission to help citizens navigate social service network of services to aid in poverty relief	Virtual	5	Training needed for navigators, especially in healthcare. Education for community also needed. Discussed agencies that might have navigators soon.
2/15/23	Bloomington Common Council	Allocation Plan invitation for Council & public comment #3 (Nine Council members and the public)	Hybrid meeting	9	Questions from council members about public comment period, timing of funds and use (expenditure deadline of 2030), sustainability of programs after funding is completed, as well as

					clarification on what is meant by non-congregate shelter.
2/15/23	Healing Hands Outreach Center	Provides resources and services that address long-term needs in homelessness, hunger & poverty	E-mail response to PJ Jack Hopkins email	1	The Center responded emphasizing the need for provision of essential services/everyday items need for living that clients cannot afford or do not have the money to purchase.
2/15/23	Society of St. Vincent De Paul		E-mail response to PJ Jack Hopkins email	1	State needs for QPs: car repair, rent deposits, beds. Gave statistics to show need for clients they have served with rental assistance in 2021.
2/20/23	City of Bloomington Redevelopment Commission (oversight commission for PJ Housing & Neighborhood Development Department)	HOME-ARP Public Hearing #2 (Five Commissioners and the public)	Hybrid meeting	5	Additional questions about rehab eligibility for home ownership. Follow-up communication on this point encourage emphasis on energy efficiency once it was clarified that rehab can only be for rental housing (comments received Feb. 21 and 28). At the public hearing, Commissioners asked about how data is tracked and what we use to form basis for gap analysis with these funds. Also focus on solutions that will move the needle on helping the QPs. No additional public comment was received.
3/1/23	City of Bloomington Community & Family Resources Department	Local PJ department focused on quality of life through programs and services designed to engage residents in	Virtual	1	Provided advice on how to distinguish types of services between case management and other direct services.

		service and participation in government. Resource center for safe and civil city efforts, local volunteer network, health initiatives, heritage culture and diversity celebrations, and staffs a number of citizen commissions. Works heavily with social service agencies and has weekly conversations with homeless service providers and shelters.			
3/14/23	Beacon/Crawford Apartments	Meeting to discuss issues with resident of PSH with lived experience	In-person	TBD	
3/14/23	Beacon	Discussion about Coordinated Entry (CE)	In-person	2	

Summarize feedback received and results of upfront consultation with these entities:

The Heading Home of South Central Indiana initiative is undertaking a great deal of long-term programming, such as Bloomington being the first community in Indiana to participate in the Built for Zero program. As Built for Zero and other programming takes off, service providers and organization with whom the PJ consulted provided feedback that could be summarized into the following areas:

1. Supportive Services

- a. Increase capacity to conduct assessments for service through Coordinated Entry (CE), including outreach to those currently experiencing homelessness by

providing on-site outreach. These services could also include immediate care services, such as medical triage and navigation to community services.

- b. Case management to assist with the following:
 - i. Medical treatment and basic needs assistance
 - ii. Housing and service navigation
 - iii. Housing cost assistance
 - iv. Eviction prevention
 - v. Reunification

These activities would be largely undertaken within “D. Supportive Services/c. Eligible Costs/M.: Case management” on page 50 of CPD Notice 21-10.

2. Rental housing

- a. New unit creation
 - i. Supporting the creation of 20-40 new supportive housing units in affordable rental housing projects within Bloomington, Indiana
- b. Rehabilitation of existing rental units
 - i. In partnership with Heading Home of South Central Indiana, as well as the Bloomington Housing Authority’s Landlord Risk Mitigation Fund program and other agencies, the PJ would provide funding to support the rehabilitation of rental units to incentivize property owners to lease to a broader range of tenants falling within the four qualifying populations.

These activities would be largely undertaken within “B. HOME-ARP Rental Housing/ 2. Eligible Activities: “...construction, and rehabilitation, including reconstruction of, affordable rental housing for qualifying and low-income households” on page 23 of CPD Notice 21-10. Further, funds would be expended in accordance with “5. Eligible costs/ a. Development hard costs and d. Related soft costs” on page 23 of CPD Notice 21-10.

While the PJ is careful to not exclude any feedback, it should also be noted that CPD Notice 21-10 provides a broad range of uses under the umbrella of Supportive Services. It is the intention of the PJ to utilize HOME-ARP funding for the expansion of case management capacity while other funding sources will support the provision of other direct community services.

Section Two: Public Participation Process

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

- **Date(s) of public notice:** 2/3/2023 (hearing one) and 2/23/2023 (hearing two)
- **Public comment period:** start date - 3/6/2023 end date - 3/20/2023
- **Date(s) of public hearing:** 2/6/2023 and 2/20/23

The Feb. 6 public hearing was also announced at the Bloomington Common Council meeting on Jan. 11, and the Feb. 20 hearing was announced at the Feb. 15 meeting of the Common Council.

Describe the public participation process:

The public participation process began on November 16, 2022 with a summary of the PJ's HOME-ARP allocation planning process presented at a meeting of the Bloomington Common Council. At this meeting, the public was invited to comment on the allocation planning process, as well as possible uses of the funds. At subsequent meetings of the City Council on January 11 and February 15, an updated presentation was given to the Council, again inviting public comment to be submitted to the Housing and Neighborhood Development (HAND) Department by March 15. Meetings of the City Council are held in person, but a virtual option (via Zoom) is also available to increase participation. The meetings are also broadcast on our local public access television station, called CATS.

In addition, while only one public hearing is required for this plan, the PJ held two noticed public meetings at meetings of the City of Bloomington Redevelopment Commission (RDC). The Commission serves as an oversight body for the HAND Department, and the hearings were held (in-person and virtually). Similar to City Council meetings, these meetings are also broadcast on CATS television. A similar presentation given at the City Council meetings was given at the RDC meetings, which was followed by a public comment period at both hearings.

Finally, the draft allocation plan was posted for public comment (online at bloomington.in.gov/hand), as well as at the Monroe County Public Library and Bloomington City Hall (hard copies) for public viewing and comment from March 6 – March 20, 2023. Public comments were to be directed to hand@bloomington.in.gov, or by calling 812.349.3401.

Describe efforts to broaden public participation:

The PJ made efforts to expand public participation through our three reports at meetings of the Bloomington City Council in 2022 and 2023 where a summary of HOME-ARP was given and public comment was invited, as well as by holding two public hearings as opposed to just one. For consistency, comments were directed to the same place throughout the process for a

March 15 deadline. Any comments received ahead of the schedule 15-day public comment period were be incorporated into the plan prior to posting, and any received the during the comment period were reflected and incorporated into the final draft plan. At two RDC meetings (Nov. 21, 2022 and Jan 3, 2023), the PJ staff also reported to Commissioners and the public that the allocation planning process was underway. As a reminder, these meetings are broadcast on CATS television. Public hearing dates were also announced at RDC meetings ahead of the scheduled hearing dates.

NOTE: while HOME-ARP training sessions provided by HUD or TA Providers were not open to the public, the PJ participated in three HOME-ARP training sessions (two online, one in person) in order to better inform the PJ (and thus the public and stakeholders) on the allocation plan, eligible activities and the overall HOME-ARP process. Information gathered at these sessions has been incorporated into public presentations during the final two months of the allocation planning process.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

The following two items are from the consultation chart that starts on Page Two of this plan, which summarizes public hearing comments received by the PJ.

2/6/23	City of Bloomington Redevelopment Commission (oversight commission for PJ Housing & Neighborhood Development Department)	HOME-ARP Public Hearing #1 (Five Commissioners and the public)	Hybrid meeting	5	Commission members asked about hard cost eligibility for rehab of homes (not rental), as well as how we might strategize to maximize the amount to help the community overall. Thoughts also shared that funds should be spent as soon as possible as opposed to stretching funds out or waiting for a period of time to begin expenditure after plan approval. Discussed further emphasis of community partners in housing security, as well as providing direct assistance (security deposits, utility deposits, safety net money). No additional public comment was received.
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2/20/23	City of Bloomington Redevelopment Commission (oversight commission for PJ Housing & Neighborhood Development Department)	HOME-ARP Public Hearing #2 (Five Commissioners and the public)	Hybrid meeting	5	Additional questions about rehab eligibility for home ownership. Follow-up communication on this point encourage emphasis on energy efficiency once it was clarified that rehab can only be for rental housing (comments received Feb. 21 and 28). At the public hearing, Commissioners asked about how data is tracked and what we use to form basis for gap analysis with these funds. No additional public comment was received.
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Summarize any comments or recommendations not accepted and state the reasons why:

As of this writing, the PJ cannot point to comments not received during the consultation or public comment phase of the allocation planning process. All comments were received and synthesized into what the PJ and those with whom it consulted feel are the most important needs for the use of HOME-ARP funds.

Section Three: Needs Assessment and Gaps Analysis

Needs Assessment

The 2020 Housing Study Commissioned by the City of Bloomington identified a number of factors that highlight the need for more affordable housing and resources for the four QPs in Bloomington. The issue of affordable housing extends far beyond someone wishing to buy a house and being unable to do so. Bloomington remains in the Top Five most expensive rental housing markets in Indiana, with an occupancy rate for rental housing of all types consistently in the high 90s on rates. The most recent market update by the Monroe County Apartment Association has this rate at 98% - again, for all housing types. What this means is that no matter the income, residents of Bloomington have trouble finding rental housing.

The Housing Study indicated that more than 60% of renters in Bloomington are cost-burdened by paying more than 30% of their monthly income toward housing, and that housing is most out of reach for those making less than \$25,000 per year. Additional statistics from HUD's Comprehensive Housing Affordability Strategy (CHAS) (2015-2019 data) show that in Bloomington, 40% of renters have at least one of four severe housing issues as identified by the Strategy.

These statistics paint a picture that most stakeholders in our community know well: we need more affordable housing for everyone, but especially for those in the lower range of income. When it concerns the four Qualifying Populations under HOME-ARP, this problem becomes much more acute.

According to the 2022 Balance of State Housing Inventory Count (Bloomington is in Region 10), utilization rates for rapid re-housing, shelters and motel voucher stays was between 85%-100%, while transitional and Permanent Supportive Housing (PSH) were between 50%-100%.

In the six-county Continuum of Care region, Bloomington has the largest population and the largest number of those surveyed during the 2022 PIT Count.

All Households:	253	
Number of persons:	322	
• Number of children:	63	
• Number of young adults (18-24):	22	
• Number of adults:	237	

Gap Analysis

In terms of identifying gaps, the most evident gap is identified by two numbers from the 2022 PIT count: the number of persons identified as experiencing homelessness at that time (322), as well as the 54 who were unsheltered at the time of the count.

Identifying gaps for service can be viewed in a couple of different ways – the first of which could be to subtract the number of emergency shelter beds available by the number of those in the PIT count who experienced homelessness in 2022. This would identify a bed gap of 65 beds, which not too far off from the number of 54 identifying as being unsheltered.

The PJ's area has the following bed capacity:

Emergency Shelter: 257

Transitional housing: 144

PSH: 345

However, the numbers are not that simple, nor do they paint a full picture of the many different types of housing services, the fluidity of stays and the gaps in other services. While you can look at the utilization rates of services and presume that those that are high mean the service is at capacity (as is the case for rapid re-housing, for instance), a service or facility with a low utilization rate could mean there are those who are not able to access the service.

The purpose behind the PJ's proposal to utilize a large portion of HOME-ARP funds for supportive services speaks to this need: we believe there is a strong need for service navigation, which was reinforced by our HOME-ARP consultation activities.

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

Homeless as defined in 24 CFR 91.5

The 2022 PIT Count identified 322 people experiencing homelessness in Monroe County. Of those, 63 were children under 18, 22 were young adults (18-24) and 237 were adults (over age 24).

Of those who were unsheltered at the time, there were 54 total – 15 female and 39 males. Of those, five were veterans, 2 were living with HIV/AIDS, 25 identified as having a mental illness and 23 identified with substance abuse disorder.

At Risk of Homelessness as defined in 24 CFR 91.5

As state previously, utilization rates for certain types of housing (rapid rehousing, for instance) were quite high, as is the number of renters in Bloomington who experience housing insecurity by being cost-burdened (more than 60%). It is both clear by the statistics listed thus far, as well as anecdotal information received by the PJ on an almost daily basis, that housing insecurity is an issue in our community. This idea is reinforced by the formation of the community wide Heading Home of South Central Indiana Initiative, as well as the City's efforts to support it with these funds, as well as regular ARPA funding.

Another factor for determining a service gap for this QP is the day-to-day work of the PJ and partnering agencies, and what we see from that. For instance, one agency who assists families had a 22% increase in request for children's beds (furniture), and a 68% increase last year. This simple statistic show an ongoing need for basic housing services. Additionally, the same agency did a survey of most recent 100 families they helped with rental assistance, and 62 reported income below 30% of AMI, 50% had rent obligations exceeding 50% of their pre-tax income and only 22% had rent payments of 30% or less of their pre-tax income.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

While it is difficult to always define rock solid numbers for this QP, the 2022 PIT count showed 47 survivors of domestic violence in Monroe County. 24 were in Emergency Shelter, while 29 were in Transitional Housing. Gaps identified by services providers were in rental assistance/eviction prevention and the need for direct service staff.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Identifying gaps for QP Four are more challenging, but our consultation phase of this allocation plan provided a lot of information for us to accurately assess there were service gaps identified by agencies who serve various populations in this QP. When looking at the numbers above under the demographic descriptions for QP One, have nearly all those who remained unsheltered during the PIT count identify with a mental illness or with substance abuse shows an acute need for service to assist QP Four.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

According to the PIT count data, there is a gap in emergency shelter beds identified in the previous section of this plan. In addition, the PJ's intended use of HOME-ARP funds being largely supportive services seeks to both increase assessments for Coordinated Entry, as well as increase navigation to service.

At Risk of Homelessness as defined in 24 CFR 91.5

Supportive service navigation and case management being proposed by the PJ will assist in filling gaps for:

- i. Medical treatment and basic needs assistance
- ii. Housing and service navigation
- iii. Housing cost assistance
- iv. Eviction prevention
- v. Reunification

The PJ's rental rehabilitation activity may also seek to assist this QP in the provision of more accessible rental housing.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Supportive service navigation and case management being proposed by the PJ will assist this QP in filling gaps for:

- i. Medical treatment and basic needs assistance
- ii. Housing and service navigation
- iii. Housing cost assistance
- iv. Eviction prevention
- v. Reunification

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Supportive service navigation and case management being proposed by the PJ will assist in filling gaps for:

- i. Medical treatment and basic needs assistance
- ii. Housing and service navigation
- iii. Housing cost assistance
- iv. Eviction prevention
- v. Reunification

The PJ's proposed activities for rental housing development can also assist this QP, specifying projects that assist those with mental or development disabilities, or experiencing mental illness or substance abuse.

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Please see above analysis on shelter inventories identified through the PIT Count and the Balance of State Region 10 Housing Inventory Count.

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of "other populations" that are "At Greatest Risk of Housing Instability," as established in the HOME-ARP Notice. If including these characteristics, identify them here:

These populations have been described previously in this plan.

Identify priority needs for qualifying populations:

Not applicable for this section.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

The PJ used the data sources listed below, as well as a great amount of feedback gathered during the consultation phase of this allocation plan. In addition, the PJ has and continues to work closely with and financially support the Heading Home of South Central Indiana initiative, an effort based on the multi-year Heading Home Plan that works to support qualifying populations to make homelessness rare, brief and non-repeating.

Data sources used

- HUD Comprehensive Housing Affordability Strategy (CHAS – 2015-2019 data)
 - <https://www.huduser.gov/PORTAL/datasets/cp.html>
- IHCD 2022 BoS Housing Inventory Count (Region 10/Monroe County)
- IHCD 2022 PIT Count (Region 10/Monroe County)
 - https://www.in.gov/ihcda/indiana-balance-of-state-continuum-of-care/hmis_data_portal/
- 2020 Bloomington Housing Study
 - <https://bloomington.in.gov/sites/default/files/2020-08/BloomingtonHousingStudy2020.pdf>
- Heading Home Plan/Heading Home of South Central Indiana (2021)
 - <https://headinghomeindiana.org/the-plan/>

Section Four: HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

The PJ plans to use the following methods of soliciting applications to utilize HOME-ARP funds.

1. Supportive Services

- Following approval of our allocation plan, the PJ will provide information to the community stating the amount of funds that will be made available for supportive services through HOME-ARP.
- The PJ will work with community partners to structure a grant program administered through the PJ (Housing & Neighborhood Development Department) to award funds over a multi-year period of time. It is the desire of the PJ to engage a group of citizens and/or stakeholders to be involved in the decision-making process for the distribution of these funds.
 - i. A part of this program will involve having potential awardees describe how they would utilize HOME-ARP capacity and operating funds to administer a HOME-ARP program. For instance, if more case management staff were to be hired through HOME-ARP, how the subrecipient might utilize capacity-building funds to enhance training or fundraising efforts. The PJ would plan to utilize those categories of HOME-ARP use as an integrated part of its supportive services grant program.
- The PJ will follow its Citizens Participation Plan and Policies & Procedures for guidance on administering the program.
- Program management for subrecipients will be conducted by the PJ.

2. Rental Housing

- The PJ will follow its process for regular HOME application intake, though it may involve revising the application. However, intake procedures will remain the same to ensure all necessary regulations are followed for both HOME and HOME-ARP, guided by the PJ's Policies & Procedures.

Describe whether the PJ will administer eligible activities directly:

The PJ does not plan to administer eligible activities directly. They will be administered through agreements with subrecipients during the term of funding.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP

grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

No funds are being provided to subrecipients or contractors prior to HUD's acceptance of the PJ's HOME-ARP allocation plan. The PJ is only utilizing allowable Administration funds.

Use of HOME-ARP Funding

<u>Use</u>	<u>Funding Amount</u>	<u>Percent of Grant</u>	<u>Statutory Limit</u>
Supportive Services	\$783,926.75	38%	
Acquisition and Development of Non-Congregate Shelters	\$0.00	0%	
Tenant-Based Rental Assistance (TBRA)	\$0.00	0%	
Development of Affordable Rental Housing	\$750,000.00	37%	
Non-profit Operating	\$102,261.85	5%	5%
Non-profit Capacity Building	\$102,261.85	5%	5%
Administration and Planning	\$306,786.55	15%	15%
Total HOME ARP Allocation	\$2,045,237		

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

The PJ desires to continue its partnership with Heading Home of South Central Indiana to work with community partners in distributing the funds to ensure we are adhering to both the Heading Home Plan described earlier, as well as the needs assessments laid out in this plan and according to HOME-ARP regulations.

The prioritization process will be driving by this data, as well as by our consultation feedback. All processes related to the distribution of funds (funding agreements, timelines and program management) will be administered by the PJ's Housing and Neighborhood Development Department (HAND).

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

The data represented in this plan, bolstered by the consultation and public participation processes, speaks to the fact that while the PJ has a robust social service community, gaps persist in what is described by many as "navigation" of services, starting with Coordinated Entry (CE) assessments being done. The gaps we are attempting to fill (partially with these funds) could be described by the following:

1. Assessing the QPs on an ongoing basis by learning as much as we can about them.
2. Keeping them as safe as possible through ongoing and sustained medical and “street” outreach to help address immediate needs and navigate them to services.
3. Providing case management supportive services to increase the ability of social service agencies to have more sustained case management that leads to housing.
4. Once housed, working to continue those case management services that, along with the addition of more or improved housing units, will assist in long-term housing stability for those in the Qualifying Populations (QPs).

Section Five: HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

These funds could provide the PJ the ability to support 10-40 units of new housing based on projects we know are coming online. Two projects currently in development each have 10 units of supportive housing that would serve either those with mental or developmental disabilities (one location) or those undergoing treatment for mental health or substance abuse disorder (another location). In addition, there could be more non-congregate supportive housing units coming online (approximately 20) that could be supported by these funds. In making decisions to support units in these projects, the PJ would need to ensure all necessary regulations and local processes met before doing so.

In addition, the PJ would work with community partners to assess its capability in assisting in the rehabilitation of rental housing that could assist the Qualifying Populations. As currently drafted in this plan, HOME-ARP funds are unlikely able to support an entire rental rehabilitation project, so the PJ would need to be engaged in a partnership to possibly provide matching funds for a rental rehabilitation project. Heading Home of South Central Indiana is working to find a way to establish a rental rehabilitation program to help incentivize housing of those at-risk.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

The City of Bloomington (PJ) has a robust affordable housing effort that can be described in three main areas: 1. Housing Security; 2. Rental Housing and 3. Home Ownership.

As a community with a major research institution in Indiana University, two-thirds of Bloomington residents are renters and the City of Bloomington regulates a rental occupancy program that has a universe of approximately 28,000 rental units inside corporate limits. However, the 2020 housing study commissioned by the City of Bloomington indicates that more than 60% of those renters are cost-burdened by spending more than 30 percent of their monthly income on housing. Bloomington remains in the Top Five most expensive rental housing markets in Indiana. To help, nearly 1,400 units of affordable housing have been created or approved since 2016 (both traditionally affordable at 80% and below AMI and that which is in the "workforce housing" category between 80%-120% AMI). This includes several units of Permanent Supportive Housing (approximately 75 units).

The effort to provide more affordable rental housing (Area Two above) has a direct and ongoing relationship with Area One above: Housing Security. The PJ's efforts here include committing \$2.7 million to the Heading Home of South Central Indiana Initiative, as well as administering

CDBG funds (both regular and CV) to benefit residents of Bloomington through service provision. These services include food, rental assistance, childcare, shelter and much more.

With all of this effort, the 2020 Housing Study indicates that our city still needs to add more affordable units, citing that the biggest shortage comes from those making less than \$25,000 per year. To do this, we must utilize HOME-ARP funds to both provide more actual housing units with these funds, as well as make sure residents are well-prepared to be housed and stay housed. HOME-ARP funds will contribute toward both of these efforts by assisting the four QPs in achieving great housing security.

Section Six: Preferences

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

The PJ is planning to utilize HOME-ARP Funds in three major areas: supportive services, new rental housing units and rehabilitation of existing rental units.

When considering the four qualifying populations the three main areas of use described above would correlate in the following way:

<u>HOME-ARP Activity</u>	<u>Preference Statement for QPs</u>
Supportive Services	No preference, could serve all four QPs. We would anticipate using Coordinated Entry whenever possible. <i>Note: part of the supportive services activity would be to increase the capacity for CE assessments. This activity would primarily impact those in QP One.</i>
Rental Housing	QPs One, Two and Four (chronically homeless, at-risk financially, mental or developmental disability, mental health or substance abuse)
Rental Housing Rehabilitation	It is possible that all four QPs could be served here as well, though it is most likely that rehabilitation would be done to incentivize providing housing to those in QPs Two and Four.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

The PJ's statement of a preference/method of prioritization stems largely from our position as the largest community in our Continuum of Care/Balance of State region (as indicated by the numbers in the needs assessment/gap analysis). With our robust network of social services, it is important that we have the capability to provide supportive services to as many of those in the QPs as possible, with a hopeful expansion of the ability to conduct CE assessment for those experiencing homelessness. We believe there is an unidentified service gap for those either

experiencing homelessness and unable to be assessed, as well as those who are not a part of the CE system that are struggling to find services.

Section Seven: Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered:

HOME-ARP Activity

Referral Method

Supportive Services

Coordinated Entry (CE)* would be primary referral system here. For those not currently experiencing homelessness, referrals would be based on an agency's current client base. This would serve all four QPs.

**Note that part of this activity would be to get more people assessed for Coordinated Entry.*

Rental Housing

Coordinated Entry would not necessarily be the only referral method here if a client eligible for housing at the project was not experiencing homelessness and was a client of an agency offering assistance or treatment. Those agencies would refer a client to the project for housing.

QPs One, Two and Four (chronically homeless, at-risk financially, mental or developmental disability, mental health or substance abuse).

Rental Housing Rehabilitation

It is possible that all four QPs could be served here as well and that all referral methods would be utilized. Coordinated Entry could be a method of referral, but partnering agencies would also provide referrals.

The main purpose of this activity would be to increase housing quality and incentivize owners to provide affordable housing to a broader universe of tenants, largely those experience financial insecurity (QP Two) or having another risk factor (QP Four).

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE.

The Coordinated Entry (CE) system would be used for referrals in the Supportive Services activity under this plan, but only if a client was experiencing homelessness. The CE method prioritization utilizes the Vulnerability Index Service Prioritization Decision Assistance Tool (VI SDPAT) for CE assessment. More broadly, the prioritization method is used to “ensure that across all subpopulations and people with various types of disabilities, the most vulnerable, at the highest risk of continued homelessness, or with the most severe service needs will be prioritized for assistance.” (Source: IHODA <https://www.in.gov/ihcda/indiana-balance-of-state-continuum-of-care/coordinated-entry-system/>)

Locally, the Coordinated Entry Committee meets every two week and makes referrals based on the list of those meeting the criteria above. From there, clients may be referred to Permanent Supportive Housing (PSH), or a rapid rehousing effort. It is a goal that all those experiencing homelessness would be a part of the CE system.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any:

The Coordinated Entry (CE) system is only involved for referrals if someone is experiencing homelessness (QP One). Other referral systems are made by agencies and others in the community, but we see this as a service deficit. Increasing the ability to navigate services in the community is a major priority for the use of HOME-ARP.

Section Eight: Limitations in a HOME-ARP rental housing or NCS project

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

<u>HOME-ARP Activity</u>	<u>Limitations for QPs</u>
Supportive Services	No limitations, could serve all four QPs.
Rental Housing	QPs One, Two and Four (chronically homeless, at-risk financially, mental or developmental disability, mental health or substance abuse). Residents of rental housing projects would be served by specific agencies providing a specific benefit.
Rental Housing Rehabilitation	It is possible that all four QPs could be served here as well, though it is most likely that rehabilitation would be done to incentivize providing housing to those in QPs Two and Four.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

- Financial factors concerning the housing market in Bloomington for those facing housing or financial insecurity are acute, with housing being the most out of reach for those making \$25,000 or less per year.
- In the PJ's Gap Analysis, it was pointed out that the 2022 PIT Count has 50 people with either mental illness or substance abuse identified as unsheltered.
- For those with mental or development disabilities who may be at risk of exploitation, additional supportive housing options are critical, as is ongoing case management.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Through the proposed supportive serves activity, the PJ hope to enhance case management and navigation for the other QPs through expanded capacity in this area. More broadly, the PJ

is working closely with community partners on an ongoing basis (outside of HOME-ARP) to make homelessness rare, brief and non-repeating by working to implement the Heading Home Plan. Our proposed HOME-ARP efforts are designed to complement this community wide effort.

Section Nine: HOME-ARP Refinancing Guidelines

- The PJ does not intend to use HOME-ARP funds to refinance existing debt secured by multi-family rental housing.

Application for Federal Assistance SF-424

* 1. Type of Submission:

- ☐ Preapplication
☒ Application
☐ Changed/Corrected Application

* 2. Type of Application:

- ☒ New
☐ Continuation
☐ Revision

* If Revision, select appropriate letter(s):

* Other (Specify):

* 3. Date Received:

4. Applicant Identifier:

5a. Federal Entity Identifier:

5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

* a. Legal Name: City of Bloomington, Indiana

* b. Employer/Taxpayer Identification Number (EIN/TIN):

35-6000954

* c. UEI:

NYDCLK4KJDG3

d. Address:

* Street1:

P.O. Box 100

Street2:

* City:

Bloomington

County/Parish:

Monroe

* State:

IN: Indiana

Province:

* Country:

USA: UNITED STATES

* Zip / Postal Code:

47462

e. Organizational Unit:

Department Name:

Housing & Neighborhood Develop

Division Name:

f. Name and contact information of person to be contacted on matters involving this application:

Prefix:

* First Name:

John

Middle Name:

C

* Last Name:

Zody

Suffix:

Title: Executive Director

Organizational Affiliation:

* Telephone Number:

812-349-3420

Fax Number:

* Email: john.zody@bloomington.in.gov

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

C: City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*** Other (specify):**

*** 10. Name of Federal Agency:**

U.S. Department of Housing & Urban Development Department

11. Catalog of Federal Domestic Assistance Number:

14.239

CFDA Title:

HOME Investment Partnerships American Rescue Plan Program (HOME-ARP)

*** 12. Funding Opportunity Number:**

N/A

*** Title:**

N/A

13. Competition Identification Number:

N/A

Title:

N/A

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

HOME Investment Partnerships American Rescue Plan Program (HOME-ARP)

Attach supporting documents as specified in agency instructions.

Add Attachment

Delete Attachment

View Attachment

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

IN-9

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

09-20-2021

* b. End Date:

09-30-2030

18. Estimated Funding (\$):

* a. Federal

2,045,237

* b. Applicant

* c. State

* d. Local

* e. Other

* f. Program Income

* g. TOTAL

2,045,237

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

☐ a. This application was made available to the State under the Executive Order 12372 Process for review on

☐ b. Program is subject to E.O. 12372 but has not been selected by the State for review.

☒ c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

☐ Yes

☒ No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

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)

☒ ** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:

* First Name: John

Middle Name:

* Last Name: Hamilton

Suffix:

* Title: Mayor of Bloomington, Bloomington, Indiana

* Telephone Number: 812-349-3401

Fax Number:

* Email: mayor@bloomington.in.gov

* Signature of Authorized Representative:

John Hamilton

* Date Signed:

06-2-23

ASSURANCES - NON-CONSTRUCTION PROGRAMS

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0040), Washington, DC 20503.


PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the awarding agency. Further, certain Federal 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 cost) to ensure proper planning, management and completion of the project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, through any authorized representative, access to and the right to examine all records, books, papers, or documents related to the award; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. 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.
4. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
5. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards for 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).
6. Will comply with all Federal statutes relating to nondiscrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended, relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific 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.
7. 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 or federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
8. Will comply, as applicable, with 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.

9. 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.
10. Will comply, if applicable, 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.
11. 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).
12. 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.
13. 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.).
14. Will comply with P.L. 93-348 regarding the protection of human subjects involved in research, development, and related activities supported by this award of assistance.
15. Will comply with the Laboratory Animal Welfare Act of 1966 (P.L. 89-544, as amended, 7 U.S.C. §§2131 et seq.) pertaining to the care, handling, and treatment of warm blooded animals held for research, teaching, or other activities supported by this award of assistance.
16. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
17. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
18. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		Mayor of Bloomington	
APPLICANT ORGANIZATION		DATE SUBMITTED	
City of Bloomington		2/7/23	

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

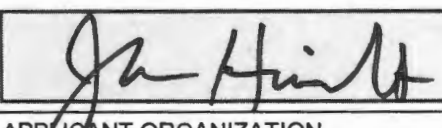
PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

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

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

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific 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.

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 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL	TITLE
	Mayor of Bloomington
APPLICANT ORGANIZATION	DATE SUBMITTED
City of Bloomington	Feb. 7, 2023

HOME-ARP CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the participating jurisdiction certifies that:

Affirmatively Further Fair Housing --The jurisdiction will affirmatively further fair housing pursuant to 24 CFR 5.151 and 5.152.

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 will comply with the acquisition and relocation requirements contained in the HOME-ARP Notice, including the revised one-for-one replacement requirements. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42, which incorporates the requirements of the HOME-ARP Notice. It will follow its residential anti-displacement and relocation assistance plan in connection with any activity assisted with funding under the HOME-ARP program.

Anti-Lobbying --To the best of the jurisdiction's knowledge and belief:

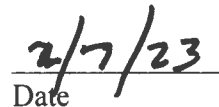
1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the 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.

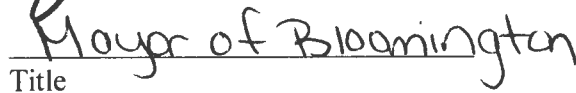
Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations and program requirements.

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.

HOME-ARP Certification --It will use HOME-ARP funds consistent with Section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2) and the CPD Notice: *Requirements for the Use of Funds in the HOME-American Rescue Plan Program*, as may be amended by HUD, for eligible activities and costs, including the HOME-ARP Notice requirements that activities are consistent with its accepted HOME-ARP allocation plan and that HOME-ARP funds will not be used for prohibited activities or costs, as described in the HOME-ARP Notice.


Signature of Authorized Official


Date


Title