



Third Program Year CAPER

The CPMP Third Consolidated Annual Performance and Evaluation Report includes Narrative Responses to CAPER questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

The grantee must submit an updated Financial Summary Report (PR26).

GENERAL

Executive Summary

Program Year 3 CAPER Executive Summary response:

The City of Terre Haute's Department of Redevelopment has continued to make substantial progress in FY 2007 to provide decent, affordable housing; provide suitable living environments; and help eliminate blighting conditions. The City of Terre Haute receives federal grant funding from the United States Department of Housing and Urban Development (HUD) to address its housing and community development issues. In order to qualify for these funds, the City must prepare a planning document that identifies the overall development needs of the community. This document is identified as the Consolidated Plan. The Consolidated Plan is a strategic five-year overview of the community's needs and identifies specific actions for addressing those needs. There are three federal entitlement grants that constitute the majority of the funding that supports the activities detailed in this report: the Community Development Block Grant (CDBG) Program, the HOME Investment Partnership Act (HOME) Program and the Emergency Shelter Grant (ESG) Program. The City was awarded approximately \$2.53 million in entitlement funding through these grant programs, to allocate to projects for FY 2007 (March 1, 2007 – February 29, 2008). This Consolidated Annual Performance and Evaluation Report (CAPER) will summarize the actions and accomplishments of those activities undertaken by the City of Terre Haute in FY 2007, to meet the objectives set forth in the Consolidated Plan.

The City of Terre Haute has completed the 3rd year of its 5-year Consolidated Planning period, and is achieving and exceeding the goals outlined in the plan. The City has projects underway which will exceed the housing development schedule and is on target with the non-housing community development schedule. The areas identified as high priority such as infrastructure improvements, first time home buyers, rental housing for very-low and low income families, eliminating blighted conditions, in addition to providing emergency shelter for individuals and families have been addressed through the activities listed in this report (see attached CAPER Matrix, exhibit "A").

A total of \$4,300,866 in grant funds were available for FY 2007 and \$1,385,758 was expended in the period of March 1, 2007 through February 29, 2008. The total amount included: \$1,321,439 of unexpended CDBG funds from the previous year, \$1,909,740 in 2007 CDBG funds and \$22,175 of CDBG program income; \$407,592 of unexpended HOME funds from the previous year, \$483,421 in 2007 HOME funds

and \$264,709 of HOME program income; \$34,766 of unexpended ESG funds from the previous year and \$83,379 in 2007 ESG funds.

\$372,336 or 26.87 % of the total funds were expended for the design and/or construction of 8,850 feet of infrastructure improvements, including storm water systems and replacement of street surface, curbs and sidewalk.

\$278,440 or 20.09% of the total funds were expended for the rehabilitation of one (1) Community Center, to serve the needs of inner city residents.

\$146,996 or 10.61% of the total funds were expended for the demolition/clearance of abandoned and vacant/dilapidated houses or structures in an effort to eliminate blighting conditions within City neighborhoods.

\$ 132,901 or 9.59% of the total funds were expended for housing activities that included the construction of single family units, the rehabilitation of 246 multi-family rental units through a non-profit, a permanent housing facility for the chronically homeless or homebuyer assistance.

\$95,445 or 6.89% of the total funds were expended for the support and operation of two emergency shelter service providers.

The Consolidated Annual Performance and Evaluation Report (CAPER) was available for citizen review and comment in the Terre Haute Department of Redevelopment, City Hall, 17 Harding Avenue, Room 301. It is required that this report be available for review for a minimum of 15 days. The review period was May 3 – May 19, 2008. The CAPER availability and comment period notice was published on May 3, 2008. The CAPER was submitted to the U.S. Department of Housing and Urban Development following this review period.

General Questions

1. Assessment of the one-year goals and objectives:
 - a. Describe the accomplishments in attaining the goals and objectives for the reporting period.
 - b. Provide a breakdown of the CPD formula grant funds spent on grant activities for each goal and objective.
 - c. If applicable, explain why progress was not made towards meeting the goals and objectives.
2. Describe the manner in which the recipient would change its program as a result of its experiences.
3. Affirmatively Furthering Fair Housing:
 - a. Provide a summary of impediments to fair housing choice.
 - b. Identify actions taken to overcome effects of impediments identified.
4. Describe Other Actions in Strategic Plan or Action Plan taken to address obstacles to meeting underserved needs.
5. Leveraging Resources

- a. Identify progress in obtaining "other" public and private resources to address needs.
- b. How Federal resources from HUD leveraged other public and private resources.
- c. How matching requirements were satisfied.

Program Year 3 CAPER General Questions response:

FY 2007 Goal - Housing

Housing Rehabilitation: CDBG Funds will be used for the cost of the physical rehabilitation of housing for the benefit of mentally or physically disabled persons, very low/low income persons, elderly persons, or disadvantaged youth. Properties rehabilitated with these funds must be occupied by income eligible residents for not less than 10 years. Approximately 3-5 dwelling units will be rehabilitated. Only income-eligible persons will qualify for this program. Objective: Provide Decent Affordable Housing. Outcome: Affordability.

Estimated Cost: - \$145,000 CDBG

New Housing Construction: The City of Terre Haute shall utilize its 2007 HOME Funds to construct housing units and assist with the development of a 10-unit apartment complex for very low, low and moderate income persons in income eligible areas, to facilitate neighborhood revitalization. The City will work with non-profits to construct five (5) to seven (7) houses on infill lots already owned by the organizations or owned by the Terre Haute Department of Redevelopment. The houses will be either renter occupied or first time homebuyers. This activity will benefit approximately 15 - 17 low/mod income persons or families. Of the two homebuyers at least one will be a minority household. At least 15% of the HOME funds will be reserved for new housing constructed with CHDO's. Objective: Provide Decent Affordable Housing. Outcome: Affordability.

Estimated Cost: - \$433,000 HOME

FY 2007 Accomplishment - Housing

New Construction:

\$ 230,000 of HOME funds were obligated in FY 2007 towards the construction of a six (6) unit residential project with the Light House Mission. The project will provide permanent housing for very-low, low/moderate and first priority to chronically homeless persons. The City's HOME funds represent approximately 87% of construction costs (Activity #404). Objective: Provide Decent Affordable Housing. Outcome: Affordability.

\$ 400,000 of HOME funds have been earmarked as matching funds towards a Federal Home Loan Bank Affordable Housing Application and private mortgage funds by the Light House Mission, for the construction of a ten (10) unit residential project. The project will provide permanent housing for very-low, low/moderate and first priority to chronically homeless persons and the City's HOME funds represent approximately 30% of construction costs. Objective:

Provide Decent Affordable Housing. Outcome: Affordability.

Housing Rehabilitation:

\$ 40,626 of CDBG Funds were expended in FY 2007 with Mother Theodore Corporation II, a non-profit organization, to complete the rehabilitation of Greenwood Apartments Phase II, a 150 unit multi-family housing complex, primarily for income eligible individuals. CDBG funds are used as a 10-year forgivable mortgage for approximately 90% of the cost of construction (Activity #385). Objective: Provide Decent Affordable Housing. Outcome: Affordability.

\$ 28,230 of HOME funds were expended in FY 2007 and \$ 401,406 of HOME funds were obligated to Mother Theodore Corporation II, a non-profit organization, to complete the rehabilitation Greenwood Apartments Phase I, a 96 unit multi-family housing complex, primarily for income eligible individuals. HOME funds are used as a 5-year forgivable mortgage for approximately 90% of the cost of construction (Activity #403). Objective: Provide Decent Affordable Housing. Outcome: Affordability.

FY 2007 Goal - Infrastructure

Street Improvements: CDBG funds will be used for continued revitalization of low/mod income neighborhoods through the design and/or construction of approximately 5,500 linear feet of curbs, gutters, storm water drainage system, a new street surface, placement of street trees, and sidewalk replacement. Objective: Create Suitable Living Environments. Outcome: Sustainability.

Estimated Cost: - \$900,000 CDBG

FY 2007 Accomplishment - Infrastructure

Street Improvements: The City continued the revitalization of low/moderate income neighborhoods through the design and/or construction of approximately 8,850 feet of curbs, gutters, a storm water drainage system, a new street surface, placement of street trees, and sidewalk replacement in the North Eastside Target Area (Activity #374 & #390) and Central Eastside Target Area (Activity #373, #391, #392 & #393). Approximately \$430,781 in CDBG funds were obligated and \$372,326 were expended in FY 2007. Objective: Create Suitable Living Environments. Outcome: Sustainability.

FY 2007 Goal - Demolition/Clearance

Demolition/Clearance: Continuance of the City's efforts to eliminate blighting conditions in target neighborhoods. The City will demolish approximately 25 abandoned and vacant/dilapidated houses and structures in low and moderate income eligible census tracts. Objective: Create Suitable Living Environments. Outcome: Sustainability.

Estimated Cost: - \$200,000 CDBG

FY 2007 Accomplishment - Demolition/Clearance

Demolition/Clearance: \$146,996 of CDBG funds were expended in FY 2007 for the demolition/clearance of 10 abandoned and vacant/dilapidated houses or structures in an effort to eliminate blighting conditions within City neighborhoods. No displacement or relocation was required with the removal of these structures (Activities #376 & #395). Objective: Create Suitable Living Environments. Outcome: Sustainability.

FY 2007 Goal - Community Center

Community Center Rehabilitation: Assisting one (1) non-profit agency with the rehabilitation of neighborhood/community center that provides services to inner city residents. Objective: Create Suitable Living Environments. Outcome: Availability/Accessibility.

Estimated Cost: - \$200,000 CDBG

FY 2007 Accomplishment - Community Center

Community Center Rehabilitation: \$278,440 of CDBG funds were expended in FY 2007 to assist a non-profit agency complete the rehabilitation of neighborhood/community center that provides services to inner city residents. Catholic Charities operates Bethany House, a homeless facility and food kitchen (Activity #394). Objective: Create Suitable Living Environments. Outcome: Availability/Accessibility.

FY 2007 Goal - Homeless Prevention/Assistance

The City of Terre Haute will solicit proposals for the Emergency Shelter Grant funding. The City anticipates receiving \$82,379 for FY 2007. Potential applicants will be notified that proposals will be accepted. All proposals will be reviewed for eligibility and need and proposed funding amounts will be outlined. In the past several years, only two agencies have submitted qualified applications: Catholic Charities and Council On Domestic Abuse. Each of these agencies are required to provide the matching funds and supporting documents for eligible expenditures. The City's goal was to assist at least two (2) homeless shelter providers in FY 2007. Objective: Provide Decent Affordable Housing. Outcome: Availability/Accessibility.

Estimated Cost: - \$82,379 ESG

FY 2007 Accomplishment - Homeless Prevention/Assistance

\$45,447 in ESG funds were expended in FY 2007 by Council On Domestic Abuse (CODA) for assistance in the operation of an existing shelter for victims of domestic violence. CODA exceeded the 1 for 1 match requirements for their programs by funding from private contributions and in-kind services (Activities #380, #381, #398 & #399). Objective: Provide Decent Affordable Housing. Outcome: Availability/Accessibility.

\$49,998 in ESG funds were expended in FY 2007 by Catholic Charities for the operation of an existing shelter for single women, women with children, and families with children. Catholic Charities exceeded the 1 for 1 match requirements for their programs by funding from private contributions and in-

kind services (Activities #382, #383, #384, #400, #401, & #402). Objective: Provide Decent Affordable Housing. Outcome: Availability/Accessibility.

Affirmatively Furthering Fair Housing

As in the previous CAPER, the City reported that no public policies were found to be impediments to fair housing. The City of Terre Haute continues to Affirmatively Further Fair Housing by participating with local banks to substantially rehabilitate and construct single family housing units for individuals, developers and 501(c)(3) not-for-profits. Some of the tenants for the rental units are from the Terre Haute Housing Authority's Family Self-Sufficiency Program. The tenants are very low/low and moderate income families that are accepting more responsibilities and moving toward independence through educational training support services. The goal is to eliminate their need for public assistance within five years.

The majority of the minority population lives in the inner city areas. The Department of Redevelopment's targeted areas encompass the largest portion of the city's minority population; however, our housing development takes place throughout the City. We advertise our housing programs in the Tribune-Star newspaper, as well as send flyers to the inner city churches and service organizations.

The Equal Housing Opportunity logo and/or slogan of statement was placed in all newspapers, housing/invitation to bid ads, and press releases to the media regarding the City's housing programs. The City also has a Fair Housing telephone number published in the phone book and works with the Terre Haute Human Relations Commission. A staff member from the Department of Redevelopment has previously served on the Human Relations Commission. We display the Fair Housing poster and slogan in the offices of the Department of Redevelopment and the Housing Authority. We have flyers on Fair Housing discrimination and complaint forms available to the public. The City of Terre Haute's web site (www.terrehaute.in.gov) includes fair housing information as well as information on filing housing discrimination complaints. Links to other HUD web sites for Fair Housing and EEO can also be found on the web site. The Department of Redevelopment displays signs with the Department's name, telephone number and equal opportunity logo. The signs are posted in the windows of the buildings that are in the process of rehabilitation and/or construction.

The Terre Haute Housing Authority participates in local seminars with the Apartment Association of Greater Terre Haute, Inc. by informing its members about Fair Housing and making available Fair Housing literature for the members to distribute. The Department of Redevelopment runs quarterly Equal Housing Opportunity ads in the housing section of the local newspaper, the Terre Haute Tribune-Star. The local Tribune-Star also runs a publisher's notice periodically for Equal Housing Opportunity.

Our past and present affirmative marketing efforts to tenants and homeowners that are least likely to apply for housing assistance have been positive. Very low and low income individuals from diverse backgrounds, including race, color, sex, religion, national origin, handicap or familial status have participated in our programs.

The City of Terre Haute has continued to promote community awareness of fair housing practices by proclaiming April as Fair Housing month. The City issues a proclamation reaffirming its commitment to furthering fair housing practices, and

promote this through the local media. We also contract with an outdoor billboard company for the month of April to display two billboards in income eligible areas, one on the east side and another on the west side of the city.

The Department of Redevelopment and the Terre Haute Housing Authority monitor and comply with the Federal Fair Housing Laws. We also support and encourage the Fair Housing Standards in all our programs.

The City of Terre Haute annually updates the Analysis of Impediments to Fair Housing (AI), which was initially completed in 1996 and prepared a new A.I. for the Consolidated Planning cycle (2006-2009). As a part of the revision process, focus group meetings were held in November and December, during the Consolidated Planning process. The focus groups consist of persons in the community who have an interest and knowledge of housing conditions in Terre Haute and desire to improve housing opportunities for all our citizens. The focus group reviews the City's A.I. and various sources of housing data.

Affordable housing remains the number one impediment to fair housing in Terre Haute. Helping to reduce housing costs is the action most likely to further the cause of fair housing in the City. This conclusion parallels the opinions expressed in the Community Development Block Grant hearings. One of the means for overcoming this impediment includes assembling sites for low cost housing along with subsidizing the cost of down payments and closing costs for home purchases. There is also a need for more rental assistance from HUD so that housing opportunities can be expanded. Another impediment identified is the lack of property maintenance and code compliance in the lower-income neighborhoods of the City. The City has upgraded the quality of infrastructure in the older neighborhoods during the past three decades, along with rehabilitating many homes and constructing new housing in these areas. Still, many private properties are not well maintained and are leased to Terre Haute residents in potential violation of building and housing codes. The City can help its lower income residents have a cleaner and safer housing environment by stronger enforcement of the existing property maintenance and building codes. It was also noted again, by the group, that costs associated with new development could be reduced or waived to increase the number of affordable sites for construction of new housing. Fair Housing awareness was identified as an area to improve, so that residents of the City are aware of their rights and what constitutes housing discrimination. The City also noted the lack of affordable housing stock for elderly and handicapped citizens as an impediment to fair housing in the City. More housing that is accessible to persons with disabilities should be developed in the community. It was noted that most elderly or disabled persons are of low income in Terre Haute. Many of the elderly and handicapped residents need minor repairs and remodeling of their properties for them to become accessible.

The City of Terre Haute's 2006 - 2009 Analysis of Impediments to Fair Housing (AI) indicated that there is no evidence of widespread discrimination in the community. The AI identified four primary areas of concern for the City of Terre Haute:

- 1) Affordable housing remains the number one impediment to fair housing in the City of Terre Haute;
- 2) The need for more homeownership opportunities to minorities and income eligible persons along with educational programs to address the lack of housing finance knowledge and lack of experience in housing finance;

- 3) Lack of property maintenance and code compliance in the lower-income neighborhoods of the City of Terre Haute;
- 4) Fair Housing education was identified as the fourth major area to address, so that more residents of the City are aware of their rights and what constitutes housing discrimination.

The following action items were identified in the AI, that the City of Terre Haute would undertake to reduce impediments during 2007:

Impediment # 1 - Housing Cost. The City will concentrate on increasing the development of more low cost housing to make it more affordable in the community for its lower income residents. This will be accomplished by subsidizing the cost of housing development through grants, loans, and forgivable loans with CDBG, HOME, and other local funds. In addition, the City will pay some of the costs of sewer and water line extensions to reduce the costs of lower income housing development, and will provide sewer tap fee waivers to developers of low-income housing. For the purpose of reducing the costs of developing low-income housing, the City will donate building sites. In Year 1: a) Develop a new program that will assist individuals and developers increase the supply of affordable housing within the City by reducing costs associated with development; b) Work with non-profit organizations to construct or rehabilitate residential housing units to lease to low-income families in Terre Haute.

Accomplishments in Year 1:

- a) The Department of Redevelopment initiated the Residential Development Program, which was designed to stimulate residential construction in the City's older and more challenging neighborhoods, and provide targeted incentives to developers who follow established guidelines to construct new residences. The program is available within a defined area of the City on sites belonging to the City or on those privately owned. Benefits to the community will include: infill of vacant lots, increase of the city's tax base, creation of new and modern housing in areas where additional infrastructure construction is minimal, and increase employment through construction jobs. These sites are cleared of trash, brush and undesirable trees, provided with a 4-pin survey and up to \$100,000 of title insurance. Five affordable housing units are being developed or have been completed in 2007;
- b) The Department of Redevelopment worked with Mother Theodore Corporation, a non-profit CHDO, to rehabilitate 96 residential units in a multi-unit apartment complex (Greenwood Apartments, Phase I) which primarily rents to low/moderate income families or individuals.

Impediment # 2 - Homeownership. The City will work with local entities to conduct a Family Self-Sufficiency Program that offers lower income citizens the opportunity to purchase homes after a period of homeownership training and supportive services (during their time period of rental housing occupancy) has been completed. Year 1: a) The City will operate a Homeownership Program that subsidizes the purchase of new housing units in the City; b) The City will provide housing sites to Habitat for Humanity for the development of new single-family homes to be purchased by low-income families; c) The City will provide housing counseling services to individuals and prospective home purchasers; d) The Department of Redevelopment will

continue a program for individuals to purchase building sites for \$1.00, provided they develop the property for residential purposes within one year.

Accomplishments in Year 1:

- a) The Department of Redevelopment administered a Homeownership program that provides down payment assistance to income eligible families or individuals toward the purchase of new housing units within the City;
- b) Assisted Habitat for Humanity with the development of new single-family homes to be purchased by low-income families;
- c) The Terre Haute Housing Authority and Department of Redevelopment provided housing counseling services to individuals involved with rental and homeownership units;
- d) The Department of Redevelopment continued a program allowing individuals to purchase building sites for \$1.00 to develop new residences within a one year time period. These sites are cleared of trash, brush and undesirable trees, provided with a 4-pin survey and up to \$100,000 of title insurance.

Impediment # 3 - Code Enforcement. The City reorganized its inspection and code compliance divisions to provide more emphasis on property maintenance and code violations. The Environmental Protection Division was created and additional staff members were assigned to code enforcement. The City is providing additional means for citizens to dispose of junk and debris from houses and yards in the community. The City provides for the removal of most appliances, furniture, and brush at regular garbage pick-up or through special requests. Citizens also have the opportunity to dispose of paint, oils, and other liquid waste products at least once a year. This improves the quality of our City by making it easier to keep our neighborhoods clean. Year 1: a) Work with the Vigo County Area Planning Department on revisions to the Unified Development Ordinance to insure that increased standards are included to address property and building maintenance concerns; b) The Environmental Protection Department will continue its increased focus to enforce local ordinances and insure property maintenance and code compliance in the lower-income neighborhoods of the City.

Accomplishments in Year 1:

- a) The Vigo County Area Planning Department is finalizing revisions to the Unified Development Ordinance to insure that increased standards are included to address property and building maintenance concerns;
- b) The Environmental Protection Department continued its increased focus to enforce local ordinances and insure property maintenance and code compliance, especially in the lower-income neighborhoods of the City.

Impediment # 4 - Education/Awareness. Fair Housing awareness was identified as an area to improve so that residents of the City are aware of their rights and what constitutes housing discrimination. Educational materials and workshops will have the greatest impact on improving Fair Housing awareness. Outreach and education by the Human Relations Commission and the City should be available to address a person's lack of knowledge regarding their rights and obligations under the law. Information is also available on the City's website indicating how to access services and address their Fair Housing concerns. In Year 1: a) Review all of the City's brochures and websites providing information on Fair Housing. Identify public agencies, organizations, community centers and neighborhood associations who can

distribute brochures and information to the public; b) New and additional existing brochures will be produced and distributed to provide information concerning Fair Housing issues.

Accomplishments in Year 1:

- a) A review of all the City's brochures and websites providing details on Fair Housing was completed. This review helped identify public agencies, organizations, community centers and neighborhood associations who assist with the distribution of brochures and information to the public regarding Fair Housing issues;
- b) The City worked with the Terre Haute Apartment Association and Human Relations Commission Director to produce new and additional existing brochures, which are distributed to the community to provide information concerning Fair Housing issues. Provided two billboards promoting Fair Housing during April and May, to coincide with the Mayor's proclamation to the media declaring February as Fair Housing month. The Department of Redevelopment also published in the local Tribune-Star newspaper four quarterly ads promoting Fair Housing, listing contact information for more details or issues to be addressed. In addition to these media resources, the Department of Redevelopment includes Fair Housing statements and the logo in its legal notices, bid notices and notices for public meetings or hearings.

A Fair Housing Focus Group meeting was held on November 29, 2007, to continue to update the City's input towards the Analysis of Impediments to Fair Housing. Attendees included the Human Relations Commission, Terre Haute Apartment Association, Pfister Realty, United Cerebral Palsy, Terre Haute Building Inspection Department, Vigo County Area Planning Department and the Department of Redevelopment.

The group again identified education and a proactive approach to Fair Housing as the highest concern for the City of Terre Haute. Fair Housing seminars and workshops are needed to broaden the outreach for attendance by landlords and housing providers. Education has the greatest impact on Fair Housing awareness. The Director of the Human Relations Commission commended the awareness and proactiveness of the Terre Haute Apartment Association. Another main concern expressed was the need for a revised brochure to distribute to tenants and homeowners to make them aware of trash, weed, animal control and other code enforcement provisions and the person to contact. The Department of Redevelopment will help underwrite the costs for new redesigned brochures and workshops/seminars. An effort is underway to connect Diversity Recognition in February with other education programs through the month of April, which is Fair Housing Awareness month. The Vigo County school system will be utilized to disseminate information and begin education programs at the elementary school level. The second highest concern expressed was the need for decent affordable housing, especially for persons with disabilities. Terre Haute has a higher percentage of older housing stock, which requires increased maintenance costs. The group supports the City's efforts to continue with the development of new affordable housing.

The funding necessary to implement these provisions of the City of Terre Haute's Fair Housing Action Plan came from the City's Federal entitlement resources (CDBG, HOME, etc.) in addition to local City resources. The Human Relations Commission is

supported by the City's general funds. The City worked with local housing and insurance providers to leverage their funds for workshops and seminars to help educate the community.

Obstacles To Underserved Needs:

The City has not identified any obstacles to meeting underserved needs, other than a steady decline in Federal funding resources.

Leveraging Resources:

During the FY 2007 Program Year, the City of Terre Haute partnered with many community organizations to fund affordable housing, homeless prevention, and supportive service projects. This participation has allowed for the City to maximize the amount of housing and services being provided through the grant dollars that are received from the U.S. Department of Housing and Urban Development. In addition to matching HOME and ESG funds with other funds, the City of Terre Haute leverages its Community Development Block Grant (CDBG) with local public funds and several other community partners. All of the activities completed used leveraged sources of income to bridge the gap between the amount funded through CDBG and the actual cost of the project. These leveraged funds were generated from other grants, local government and private donations of funds and services. In some cases, CDBG funds were used as local match to leverage other federal grants.

Bethany House was rehabilitated to provide outreach services for low/mod income persons. The City of Terre Haute's CDBG funds were used as a 10-year forgivable mortgage for approximately 87% of the rehabilitation and design costs of this inner city Community Center.

\$ 230,000 of HOME funds were obligated towards a six (6) unit residential project by the Light House Mission, that will provide permanent housing for very-low, low/moderate and first priority to chronically homeless persons. The City's HOME funds represent approximately 90% of the construction and design costs.

\$ 400,000 of HOME funds have been earmarked as matching funds towards a Federal Home Loan Bank Affordable Housing Application by the Light House Mission, for the construction of a ten (10) unit residential project will provide permanent housing for very-low, low/moderate and first priority to chronically homeless persons. The City's HOME funds represent approximately 30% of construction costs.

\$45,447 in ESG funds were expended in FY 2007 by Council On Domestic Abuse (CODA) for assistance in the operation of an existing shelter for victims of domestic violence. CODA exceeded the 1 for 1 match requirements for their programs by funding from private contributions and in-kind services.

\$49,998 in ESG funds were expended in FY 2007 by Catholic Charities for the operation of an existing shelter for single women, women with children, and families with children. Catholic Charities exceeded the 1 for 1 match requirements for their programs by funding from private contributions and in-kind services.

Managing the Process

1. Describe actions taken during the last year to ensure compliance with program and comprehensive planning requirements.

Program Year 3 CAPER Managing the Process response:

The City of Terre Haute reviews our funding requests for consistency with our local planning documents. We assure project compliance with the provisions of the National Affordable Housing Act in terms of housing quality standards, lead base paint abatement requirements, handicap accessibility, local and State building codes, Davis-Bacon prevailing wage, zoning and planning ordinances, and other applicable requirements in awarding contracts and in all our requests for proposals.

Information in the CAPER compares expenditures and accomplishments to the goals and priorities of the Consolidated Plan. A review of this information indicates that funds are being directed to meet the Consolidated Plan's priority needs.

Administration of the CDBG / HOME programs is proceeding effectively and efficiently. Disbursements are made on time, and the CDBG expenditure rate is within the limits of program requirements and generally exceeds them. The rate of HOME commitments and expenditures are within the requirements set by HOME regulations.

Citizen Participation

1. Provide a summary of citizen comments.
2. In addition, the performance report provided to citizens must identify the Federal funds made available for furthering the objectives of the Consolidated Plan. For each formula grant program, the grantee shall identify the total amount of funds available (including estimated program income), the total amount of funds committed during the reporting period, the total amount expended during the reporting period, and the geographic distribution and location of expenditures. Jurisdictions are encouraged to include maps in describing the geographic distribution and location of investment (including areas of minority concentration). The geographic distribution and expenditure requirement may also be satisfied by specifying the census tracts where expenditures were concentrated.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

Program Year 3 CAPER Citizen Participation response:

The Consolidated Annual Performance and Evaluation Report (CAPER) was available for citizen review and comment in the Terre Haute Department of Redevelopment, City Hall, 17 Harding Avenue, Room 301. It is required that this report be available for review for a minimum of 15 days. The review period was May 3 – May 19, 2008. The CAPER availability and comment period notice was published on May 3, 2008 (see attached proof of publication, exhibit "B"). The CAPER was submitted to the U.S. Department of Housing and Urban Development following this review period.

There were no comments received from the public regarding the CAPER during this period.

Exhibit "C" is a map that shows the geographic location of Target Areas, designated by the City Council, where CDBG and HOME funds are directed. The projects are generally distributed evenly throughout the City's various target areas. Exhibit "D" is a map that shows the income eligible areas of the City. The Consolidated Annual Performance Report provided to the public identifies all of the Federal funds that the City of Terre Haute receives to further the objectives of the Consolidated Plan. This report details the total funds available, what portion has been committed and the total amount expended during the reporting period (see the attached Financial Summary Report COPR26 for CDBG expenditures).

Institutional Structure

1. Describe actions taken during the last year to overcome gaps in institutional structures and enhance coordination.

Program Year 3 CAPER Institutional Structure response:

The City has established various housing, service provider and infrastructure focus groups. These focus groups met periodically to contribute ideas and assess the services being provided to the citizens of Terre Haute. This forum process offers a structured process to provide feedback through the completion of the Consolidated Plan and beyond. The Department of Redevelopment provides assistance to low, very-low, and extremely low-income groups requesting assistance in developing proposals for federal programs under the Housing and Community Development Consolidated Plan. The City of Terre Haute also gives assistance in helping to answer questions relating to equal opportunity requirements, relocation provisions, etc. This technical assistance is available on a continuous basis. Citizens will be encouraged by the City of Terre Haute to continually write their suggestions down and send them in for consideration.

To eliminate gaps in the housing delivery system, the Department of Redevelopment continues to analyze the existing institutional structure to develop solutions for a more effective service delivery. The Department of Redevelopment continues to work with Old National Bank, First Financial National Bank, Terre Haute Savings Bank and Fifth Third Bank to provide matching and/or supportive funds for the HOME and CDBG programs. The Department of Redevelopment is working to assist local banks in meeting the Community Reinvestment Act.

The Terre Haute Department of Redevelopment and the Terre Haute Housing Authority continues to work with other community organizations and government entities to participate in and/or assess the existing programs for affordable housing and services, and assess the need for new programs to be developed to meet any housing deficiencies. Mental health agencies, area aging agencies, physical abuse agencies, charities and nonprofit organizations are a few of the community organizations that are involved with the assessment process. Some of the government entities that participate with the housing programs and/or assessment are the Indiana Housing Finance Authority, State Historic Preservation Office, Vigo County Public Welfare Office, and the Federal Home Loan Bank.

The City of Terre Haute continues to meet with public and assisted housing providers, private and government health, mental health and service agencies, to help coordinate housing and community development activities for low/moderate income individuals and families. These actions have helped the City to decide which housing activities to undertake. The City of Terre Haute will continue to leverage its financial resources with private funds by participating with local banks on housing finance and development. The City's focus groups identified goals to help make the community more livable and better functioning.

The community has also developed an Economic Development Strategy which identifies and evaluates the opportunities and assets for educational institutions, job training efforts, and community development programs. The overall goals of this Economic Development Strategy are to improve the employment opportunities for citizens of Terre Haute; raise per capita income in the Terre Haute area; and improve the local tax base. The City of Terre Haute is updating its Comprehensive Plan which should include a physical assessment of its Streets and a Housing Inventory, to help develop its priority housing and community development needs. Through these actions, the Department of Redevelopment has and will continue to coordinate with other agencies to implement its strategy.

The Department of Redevelopment will continue to assist the Vigo County Homeless Coalition with the enhancement of the City's Continuum of Care Strategy. Two persons from the Redevelopment staff have served on the Coalition and work closely with the organization to develop strategies and support local projects.

Monitoring

1. Describe how and the frequency with which you monitored your activities.
2. Describe the results of your monitoring including any improvements.
3. Self Evaluation
 - a. Describe the effect programs have in solving neighborhood and community problems.
 - b. Describe progress in meeting priority needs and specific objectives and help make community's vision of the future a reality.
 - c. Describe how you provided decent housing and a suitable living environment and expanded economic opportunity principally for low and moderate-income persons.
 - d. Indicate any activities falling behind schedule.
 - e. Describe how activities and strategies made an impact on identified needs.
 - f. Identify indicators that would best describe the results.
 - g. Identify barriers that had a negative impact on fulfilling the strategies and overall vision.
 - h. Identify whether major goals are on target and discuss reasons for those that are not on target.
 - i. Identify any adjustments or improvements to strategies and activities that might meet your needs more effectively.

Program Year 3 CAPER Monitoring response:

The City of Terre Haute is a CDBG entitlement city and has supplied HUD with the documentation required for their monitoring and compliance visits. We review our funding requests for consistency with our local planning documents. We assure project compliance with the provisions of the National Affordable Housing Act in terms of housing quality standards, lead base paint abatement requirements, handicap accessibility, local and State building codes, Davis-Bacon prevailing wage, zoning and planning ordinances, and other applicable requirements in awarding contracts and in all our requests for proposals. The City Engineering Department's Building Code Division and the Department of Redevelopment inspects all of the rehabilitation and construction projects funded by the CDBG and HOME programs. The Inspection Department issues a certificate of occupancy when the projects are completed by state and municipal code standards. When discrepancies are noted, the owner is required to make corrections. If any state or federally funded project involves relocation or displacement we assure compliance with the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended. The Department of Redevelopment will try to avoid any relocation or displacement in our projects when possible.

The Terre Haute Department of Redevelopment and the Housing Authority monitor and comply with the Federal Fair Housing Laws. We also support and encourage the Fair Housing Standards in all of our housing programs. The City of Terre Haute does not have any sub-recipients, so monitoring requirements are extremely limited.

The City participates with several CHDO's to expend HOME funds. None of the CHDO'S that the City works with are sub-recipients. The Department of Redevelopment works directly with the CHDO's to insure compliance with program requirements, including timeliness of expenditures. The Department also oversees the bidding and procurement procedures for all projects. The Department annually monitors the affordable housing projects it has funded to insure compliance with all HOME program requirements and provides on-site inspections to ensure long-term compliance with housing codes as stated in the borrower certification agreements that are recorded as part of the mortgages. HOME activities which assist homebuyers include a recorded agreement that protects the affordability provisions regarding resale of the housing units. The owners are required to sell the existing property to a subsequent qualified low-income purchaser and the owner will receive a fair return on their investment, including improvements. Tenant household characteristics and affirmative marketing procedures are required from the CHDO's and other non-profit organizations each year to maintain the affordability compliance of the programs.

The Department of Redevelopment annually reviews programs in order to monitor the City's performance in meeting its goals and objectives set forth in its Consolidated Plan. These results are reported in the CAPER and made available to HUD and the public.

The above actions have assured timeliness of program expenditures as indicated by HUD's publication of the City's high percentage of state and national rankings of expenditures from the past several years.

Self Evaluation

The City of Terre Haute's planning process allows the City the opportunity to indicate a clear vision of the future that is to be funded with HUD funds. The City has, for

many years, continued to rebuild neighborhood infrastructure and provide more affordable housing units. The City has also increased its assistance to the homeless, through non-profits, and has worked to create five Comprehensive Housing Development Corporations (CHDOs) and is working on developing more. The City will continue to pursue the following locally determined objectives: (1) Enhance the quality of life in the City's neighborhoods with construction of curbs, gutters, sidewalks, and street/drainage facilities; (2) Conserve and revitalize housing through the rehabilitation of housing stock; (3) Eliminate blight and unsightly conditions through the demolition and clearance of vacant and dilapidated structures; (4) Construct new residential units throughout the City for income eligible persons; (5) Provide homeownership opportunities for first time homebuyers.

Although increasing land and housing prices make affordable housing difficult to find for very-low and low income households, it also puts homeownership nearly out of reach for the average worker such as teachers, firemen, and police. Due to storms that hit the coast these past few years, construction costs have increased, materials are more scarce and prices have increased.

Demolition/Clearance Activities have reduced areas conducive to crime and vagrancy, removed health and safety hazards and improved property values.

CDBG and HOME funded projects continue to meet major goals set out in the action plan.

HOME mortgage assistance for first-time homebuyers has been used as gap funding to reduce the first mortgage, lowering monthly payments.

CDBG funded projects continue to meet major goals set out in the action plan. The HOME program has been slowed in meeting its affordable housing goals mainly due to the use of funds as a match source for a Supportive Housing Project. This project was completed in FY06. Other HOME funded projects continue to meet major goals set out in the action plan.

The City has been able to commit and expend the funds for all grant programs in a timely manner. All of the proposed activities are being completed on schedule and the major goals are on target, or are being exceeded. The City of Terre Haute does not propose any adjustments to its strategies and activities at this time.

Lead-based Paint

1. Describe actions taken during the last year to evaluate and reduce lead-based paint hazards.

Program Year 3 CAPER Lead-based Paint response:

Through FY 2007 the City continued to work with the Lead-Based Paint Coalition of Vigo County, which was formed by several interested groups in the Terre Haute area. The group prepared a grant application for lead hazard education as a part of the FY 2007 SuperNOFA, but was not funded. The organization recognized that lead poisoning is a preventable disease, and it is an important issue that must be addressed. At present, there are no formal remediation programs in place. Lead-based paint issues cross all socio-economic lines. In addition to the low/mod income areas of the community, there are also several well established older middle/upper

income neighborhoods where renovation or remodeling is taking place. Educating our Citizens about lead-based paint issues is a responsibility, not only now, but to future generations. The group developed a plan with the assistance of the Vigo County Health Department, Vigo County School Corporation, Western Indiana Community Action Agency, Terre Haute Department of Redevelopment and the Terre Haute Housing Authority to identify housing and community development needs and set forth strategies and goals to address lead-based paint issues. The grant application was for a community wide education program. The Coalition plans to submit additional applications in the future to address both education and remediation programs.

The City of Terre Haute will continue with lead-hazard reduction and education activities through its current housing program requirements.

HOUSING

Housing Needs

*Please also refer to the Housing Needs Table in the Needs.xls workbook.

1. Describe Actions taken during the last year to foster and maintain affordable housing.

Program Year 3 CAPER Housing Needs response:

In the 2007 Action Plan, owner and rental housing for very-low, low and moderate income residents was identified as a high priority need along with housing opportunities for all low/mod income residents regardless of family size and age.

The City is in the process of completing or has completed two hundred fifty-two (252) housing units during FY 2007 for income eligible residents. One hundred fifty (150) multi-family rental housing units were rehabilitated with CDBG funds, for a non-profit to serve primarily income eligible individuals. Six (6) rental units are being constructed with HOME funds. These units will provide permanent housing for the chronically homeless, and all six (6) units will assist very low-income persons. Ninety-six (96) multi-family rental housing units are being rehabilitated with HOME funds, for a non-profit to serve primarily income eligible individuals.

The City of Terre Haute is among the most affordable cities in the State to purchase a home and live. The City continues to direct CDBG, HOME and other housing programs to help pay for buildings to be brought up to code. This, in turn, makes decent, safe and sanitary housing affordable. The City has not identified a problem with overcrowding, lost assisted housing as a result of public housing demolition, conversion to homeownership, prepayment, or voluntary termination of a federally assisted mortgage (or any other actions). The City does not contribute to concentration of racial or ethnic minorities through its housing programs. Also the Department of Redevelopment provides a program to make housing sites available for \$1.00 to any persons who will develop a home on the property within one year of purchase.

The Department of Redevelopment initiated the Residential Development Program, which was designed to stimulate residential construction in the City's older and more challenging neighborhoods, and provide targeted incentives to developers who follow established guidelines to construct new residences. The program is available within a defined area of the City on sites belonging to the City or on those privately owned. Benefits to the community will include: infill of vacant lots, increase of the city's tax base, creation of new and modern housing in areas where additional infrastructure construction is minimal, and increase employment through construction jobs. These sites are cleared of trash, brush and undesirable trees, provided with a 4-pin survey and up to \$100,000 of title insurance. Five affordable housing units are being developed or have been completed in FY 2007.

In addition to the entitlement grants, local banks also participate in the programs by lending funds for mortgages at affordable interest rates and terms to leverage the City's expenditure of HOME and CDBG funds in order to make the units affordable.

Specific Housing Objectives

1. Evaluate progress in meeting specific objective of providing affordable housing, including the number of extremely low-income, low-income, and moderate-income renter and owner households comparing actual accomplishments with proposed goals during the reporting period.
2. Evaluate progress in providing affordable housing that meets the Section 215 definition of affordable housing for rental and owner households comparing actual accomplishments with proposed goals during the reporting period.
3. Describe efforts to address "worst-case" housing needs and housing needs of persons with disabilities.

Program Year 3 CAPER Specific Housing Objectives response:

Specific housing objectives outlined in the City of Terre Haute's Strategic Plan indicate that 18-23 housing units would be completed during the third year of the Consolidated Plan. There are 252 units either completed or underway during FY 2007. The HOME CHDO requirement of 15% has been exceeded by expending over \$429,736 for current projects completed with a CHDO (Mother Theodore Corp. II).

An ongoing problem faced by the City of Terre Haute is a lack of availability of affordable housing for very-low income residents. Even though this problem is most prevalent on the very-low income residents, the rising cost of housing in the last few years has created issues for the low and moderate income residents as well. In addition, a problem faced by many low-income applicants is poor credit history which makes it difficult to qualify them for housing programs offered in the City.

The Terre Haute Department of Redevelopment over the past years has made funds available through the CDBG and Home Program for developmentally and physically disabled individuals for housing units through the local not-for-profits. United Cerebral Palsy and Hamilton Center both own houses and apartment units that are accessible to individuals with physical disabilities. Both agencies usually have people that are on a waiting list. Rehabilitation of our aging housing stock will still be a priority for all household income groups over the next several years. We should continue to see an increase in the very low and low-income elderly owner population

as people live longer, and their houses will require more repair and maintenance at much higher costs. These factors tell us that all very low and low-income individuals will continue to need similar mortgage and tenant assistance, so the City should continue rental and ownership housing programs in the future.

Public Housing Strategy

1. Describe actions taken during the last year to improve public housing and resident initiatives.

Program Year 3 CAPER Public Housing Strategy response:

The Terre Haute Housing Authority utilized its Capital funding grants to make improvements to the public housing units. Homeownership activities were accomplished through the use of the FSS Coordinator grant. Tenants who receive Section 8 assistance, and have lived in qualified houses for a period of three years and participated in the Homeownership guidance program are able to purchase the housing units.

The Terre Haute Housing Authority (THHA) is rated a “High Performing” Organization by the Office of Housing and Urban Development (HUD). The THHA has ongoing resident initiatives that will continue during the coming year. Residents are active in each of the THHA’s Public Housing communities where meetings are held every other month. A THHA staff person attends some of the meetings as a liaison. A representative from the Terre Haute Police Department attends meetings to assist with Neighborhood Watch Programs.

Barriers to Affordable Housing

1. Describe actions taken during the last year to eliminate barriers to affordable housing.

Program Year 3 CAPER Barriers to Affordable Housing response:

The City of Terre Haute provided CDBG and HOME funds to several non-profit agencies providing affordable housing. Terre Haute does not have public policies, regulations, or rules that would negatively affect the affordability of housing. Terre Haute has been among the most affordable cities in the state and country in which to live and purchase or rent a home. The City will continue to direct CDBG resources and other housing programs to help pay for buildings to be brought up to code and subsidize new development to make decent, safe and sanitary housing affordable. In the past the City has not identified a problem with overcrowding, or losing any assisted housing inventory as a result of public housing demolition or conversion to homeownership, prepayment, or voluntary termination of a federally assisted mortgage or any other actions. The City will not contribute to the concentration of racial or ethnic minorities through its housing programs. The City has not identified any negative policies or barriers towards affordable housing. The City strives to facilitate programs that provide housing opportunities for all very low/low or moderate income residents regardless of family size and age.

HOME/ American Dream Down Payment Initiative (ADDI)

1. Assessment of Relationship of HOME Funds to Goals and Objectives
 - a. Evaluate progress made toward meeting goals for providing affordable housing using HOME funds, including the number and types of households served.
2. HOME Match Report
 - a. Use HOME Match Report HUD-40107-A to report on match contributions for the period covered by the Consolidated Plan program year.
3. HOME MBE and WBE Report
 - a. Use Part III of HUD Form 40107 to report contracts and subcontracts with Minority Business Enterprises (MBEs) and Women's Business Enterprises (WBEs).
4. Assessments
 - a. Detail results of on-site inspections of rental housing.
 - b. Describe the HOME jurisdiction's affirmative marketing actions.
 - c. Describe outreach to minority and women owned businesses.

Program Year 3 CAPER HOME/ADDI response:

1. The City of Terre Haute distributed its HOME funds among categories identified as a high priority in its Consolidated Plan. New construction was directed toward providing rental housing for households with very low/low and moderate income. 15-18 housing units were proposed for FY 2007. Six (6) rental units are being constructed with HOME funds. These units will provide permanent housing for the chronically homeless, and all six (6) units will assist very low-income persons. Ninety-six (96) multi-family rental housing units are being rehabilitated with HOME funds, for a non-profit to serve primarily income eligible individuals.
2. No Match is required. There is a 100% Match Reduction for the City of Terre Haute. (see attached match reduction report, Exhibit "E").
3. There were no MBEs or WBEs participating in our HOME programs in FY 2007.
4. Assessments
 - a. The City of Terre Haute monitors rental projects on an annual basis for adherence to HUD guidelines. All projects are currently in compliance. HOME assisted rental housing site inspections for 2007 were conducted on 29% of the required HOME units. The following is a list of owners and addresses that were inspected using HUD inspection form 52580 for Section 8 Tenant Based Assistance. All of the units passed the inspections.

Council on Domestic Abuse, Inc.
1400 Hulman Street

1400 Hulman Street
- Apartment #4
- Apartment #6

Jonah, Inc.
P.O. Box 3291

2022 5th Avenue
2413 N. 17th Street
615 S. 13½ Street
1910 Tippecanoe Street
1201 S. 14th Street

United Cerebral Palsy
621 Poplar Street

1520 S. 14th Street
1528 S. 14th Street
1556 S. 13½ Street
1530 Wilson Street
441 S. 17th Street
1413 S. 13½ Street

HCI Development Corporation
Hamilton Center

1400 North Avenue
- Apartment #107
- Apartment #225

Light House Mission
1450 Wabash Avenue

1450 Wabash Avenue
- Apartment #343
- Apartment #327
- Apartment #354
- Apartment #367
- Apartment #316
- Apartment #313
- Apartment #310

Mother Theodore Corporation
P.O. Box 988

1403 2nd Avenue
1462 3rd Avenue
1522 S. 11th Street
1423 S. 12th Street

Terre Haute Housing Authority Development Corp.
P.O. Box 3086

1453 Liberty Avenue
2511 N. 15½ Street
1000 Gilbert Avenue

1503 Cruft Street
2002 Ash Street

- b. Our past and present affirmative marketing efforts to tenants and homeowners that are least likely to apply for housing assistance have been positive. Very low and low income individuals from diverse backgrounds, including race, color, sex, religion, national origin, handicap or familial status have participated widely in our programs. The HOME program requires participating jurisdictions to design a statement of policy and procedures to follow to meet the affirmative marketing and minority and women business outreach requirements as defined in 24 CFR Part 92. The Terre Haute Housing Authority and the non-profit agencies affirmatively market the new housing units in projects containing five or more HOME-assisted housing units to all individuals, including minority and women tenants in accordance with the Federal Affirmative Marketing procedures as defined in 24 CFR Part 92. The initial marketing of the housing units is carried out by the Terre Haute Housing Authority or non-profit agencies. The City informs the public, owners and tenants about Federal Fair Housing Laws by:
- Placing statements regarding affirmative marketing policy and procedures in any media releases and reports. A description of applicable fair housing laws is also provided to owners and tenants;
 - Placing the equal housing opportunity logo, slogan, or statement, in any newspaper ads and other media regarding the program;
 - Giving direct notice to owners and tenants of the affirmative marketing policy, procedures, and fair housing law;

Owners of the housing constructed with HOME funds are required to implement the following practices & procedures:

- Advertising vacant units in commercial media, using the equal opportunity logo type, slogan, or statement;
- Displaying the fair housing poster in their leasing office;
- Making good faith efforts by using community contacts and provide information to attract eligible persons from all racial, ethnic, and gender groups in the housing market area.

Special outreach efforts are undertaken to reach persons who are least likely to apply for the housing by contacting community organizations, churches, employment centers, fair housing groups, housing counseling agencies, and minority Section 8 landlords.

Racial, ethnic and gender characteristic records as required by Section 511.71 are maintained concerning tenancy before and after construction. Likewise, relocation data for displaced households will be maintained in individual files and on a computer spreadsheet, which will be a total of the individual files. Assessment of affirmative marketing efforts of owners is accomplished by requiring the housing owners to keep records regarding their marketing information and the racial, ethnic, and gender characteristics of their tenants. The City assesses the marketing effort of the owners by collecting and reviewing the data collected by the owners. If affirmative marketing efforts are not met, the City will work with the owners to complete special outreach programs to seek tenants, and/or foreclose the mortgage loan. The results of the affirmative marketing for rental tenants are stated on the attached sheet (see Exhibit "F").

- c. To comply with the affirmative marketing actions to provide outreach to minority and women owned businesses, we stated in our newspaper "invitation to bid" ads, that minority and women owned businesses were encouraged to apply. The City also sent "invitation to bid" notices to known minority and women owned businesses, three construction news magazines and the Indiana Small Business Development Corporation. The City of Terre Haute has achieved limited success in its outreach program for minority-owned and women-owned businesses due to the small number of minority and female contractors located in the Terre Haute and surrounding areas. The City has expanded its outreach efforts for minority and women-owned businesses, through various resources. The City continues to send notices for construction bids to the following sources:
- Advertisements in the local newspaper with a notation that minority and women-owned businesses are encouraged to bid.
 - Minority and women-owned businesses that requested to be put on our mailing list.
 - The Division of Minority Enterprise with the Indiana Department of Administration.
 - The Minority Business Development Division of the Indiana Small Business Development Corporation.
 - The F. W. Dodge, Inc. Offices in Indianapolis and Evansville.
 - Construction Market Data located in Indianapolis.
 - Tri-State Construction News in Evansville.
 - The Department of Redevelopment's web page.

The City of Terre Haute does not receive ADDI funding.

HOMELESS

Homeless Needs

*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

1. Identify actions taken to address needs of homeless persons.
2. Identify actions to help homeless persons make the transition to permanent housing and independent living.
3. Identify new Federal resources obtained from Homeless SuperNOFA.

Program Year 3 CAPER Homeless Needs response:

The Vigo County Homeless Coalition, our local CoC, established in 1996, serves as the lead entity in the Continuum of Care for Terre Haute area. Comprised of local Social Service Agencies, Homeless Providers, Government Officials, and Community leaders, the group was formed to address the needs of the homeless and those at risk of becoming homeless.

Over the past twelve months, the Coalition has worked on outlines for projects desperately needed in the community, including youth homelessness, chronic homelessness, and urban revitalization. The intent of these outlines is to have in place desired programs should funding become available in a short time frame. This increases the likelihood that the community could respond quickly.

In addition, a large focus of the Vigo County Homeless Coalition (VCHC) over the past several months has been to focus on the needs of the chronically homeless. The strategy to accomplish this task has been to include substance abuse providers to address the additional needs. Many members of the Coalition are working on expanded drug treatment in residential settings, and pulling together the appropriate agencies to provide supportive services. Many projects are currently on the drawing board. The Department of Redevelopment continues to assist the Vigo County Homeless Coalition with the enhancement of the City's Continuum of Care Strategy. The Vigo County Homeless Coalition is the lead entity for the continuum of care. The Coalition was established specifically to address the growing homeless population in the area, and develop a proactive approach to meeting the needs of that population. The Coalition draws membership from a broad section of the community, and invites all community members to participate. As the only group in the region specifically dedicated to look at the needs of homeless persons, the VCHC has assumed the role as lead entity in planning and developing the community, Continuum of Care. The Vigo County Homeless Coalition (VCHC) is composed of housing and/or supportive services and other concerned citizens, banks, groups, individuals and churches. Thirty-five (35) organizations provide supportive services, ten (10) organizations provide housing and there are eight (8) organizations providing other various services. The VCHC meets on the second Tuesday each month with committees meeting as needed. Two persons from the Redevelopment staff serve on the Coalition and work closely with the organization to develop strategies and support local projects. Two major priorities identified were to assist the mentally handicapped with permanent and independent housing and assist the homeless with transitional and permanent housing. Services for the homeless and low-income residents were also identified as a need to be addressed.

The VCHC supported Community YOUunity with a Supportive Housing application through the SuperNOFA, for a 10-unit apartment project to serve chronically homeless persons (these units were constructed with \$400,000 of SHP funds, \$120,000 of Developer's funds and \$400,000 of the City's HOME funds). SHP funds will supplement Supportive Services and Operations for three years to assist this project. The Mental Health project will reduce the chronic homeless population by approximately 10-15 persons in supervised units with on-site supportive services. The VCHC also supported the rehabilitation of transitional housing units on the third floor of the Light House Mission building for homeless individuals. The individuals are participating in life skill classes so that they will be self-sufficient in the near future. CDBG funds were used for this project. Another project supported by the VCHC was St. Ann's Community Outreach Center. The rehabilitation of the second floor of an old elementary school, complete with an elevator, to be used for a handicap accessible free dental clinic for low-income persons. The dental clinic has 5 dental chairs and 2 x-ray machines. CDBG funds were used for this project, to assist the non-profit group.

In addition to following the State of Indiana's Plan to end Chronic Homelessness, the Vigo County Homeless Coalition is continuing to develop networks within the area to educate members of the community to the needs of the chronically homeless. The VCHC believes that the more substance abuse residential treatment available, the more likelihood that those completing it will be able to obtain and keep permanent housing. Members of the Coalition are working with the Sheriff's Task force on Jail overcrowding and the Compass II Methamphetamine Task Force. With Community YOUunity's Project completed and the Hamilton Center Project open, agencies

participating in the Homeless Coalition are continuing to look for additional funding to provide case management services. The VCHC has been targeting chronic homelessness, youth homelessness, and substandard rental property.

The Vigo County Homeless Coalition will continue to work with publicly funded institutions to request that they comply with guidelines similar to and following state mental health services for release of individuals to the community: Before an individual is discharged or placed on outpatient status, a discharge plan shall be formulated in consultation with the patient's designated case-manager. The superintendent shall provide copies of the individual's plan of discharge or placement to a community mental health center or a managed care provider serving the area in which the individual will reside. The plan must include the following: (1) A copy of the papers authorizing the discharge or placement; (2) An assessment of the individual's mental health; (3) The superintendent's recommendations concerning the follow-up treatment services and the specific residential placement that the individual should receive after the individual is discharged or placed; (4) If the individual has been placed on outpatient status, a description of the conditions relating to the individual's placement.

Specific Homeless Prevention Elements

1. Identify actions taken to prevent homelessness.

Program Year 3 CAPER Specific Housing Prevention Elements response:

The Vigo County Homeless Coalition was established specifically to address the homeless population in the area, and develop a proactive approach to meeting the needs of that population. Comprised of local Social Service Agencies, Homeless Providers, Government Officials, and Community leaders, the group was formed to address the needs of the homeless and those at risk of becoming homeless. The chronically homeless that are mentally ill, substance abusers and dually diagnosed are currently being underserved in the community. Most of these individuals are not sheltered or receiving the necessary supportive services. In order to address these needs, organizations like the Community YOUunity developed permanent supportive housing for the unsheltered chronically homeless.

The City of Terre Haute along with housing financial institutions and service providers communicate with each other throughout the year concerning the needs of social service programs, such as the Terre Haute Housing Authority's Family Self-Sufficiency Program to prevent low-income individuals and families with children from being homeless.

Emergency Shelter Grants (ESG)

1. Identify actions to address emergency shelter and transitional housing needs of homeless individuals and families (including significant subpopulations such as those living on the streets).
2. Assessment of Relationship of ESG Funds to Goals and Objectives

- a. Evaluate progress made in using ESG funds to address homeless and homeless prevention needs, goals, and specific objectives established in the Consolidated Plan.
 - b. Detail how ESG projects are related to implementation of comprehensive homeless planning strategy, including the number and types of individuals and persons in households served with ESG funds.
3. Matching Resources
 - a. Provide specific sources and amounts of new funding used to meet match as required by 42 USC 11375(a)(1), including cash resources, grants, and staff salaries, as well as in-kind contributions such as the value of a building or lease, donated materials, or volunteer time.
 4. State Method of Distribution
 - a. States must describe their method of distribution and how it rated and selected its local government agencies and private nonprofit organizations acting as subrecipients.
 5. Activity and Beneficiary Data
 - a. Completion of attached Emergency Shelter Grant Program Performance Chart or other reports showing ESGP expenditures by type of activity. Also describe any problems in collecting, reporting, and evaluating the reliability of this information.
 - b. Homeless Discharge Coordination
 - i. As part of the government developing and implementing a homeless discharge coordination policy, ESG homeless prevention funds may be used to assist very-low income individuals and families at risk of becoming homeless after being released from publicly funded institutions such as health care facilities, foster care or other youth facilities, or corrections institutions or programs.
 - c. Explain how your government is instituting a homeless discharge coordination policy, and how ESG homeless prevention funds are being used in this effort.

Program Year 3 CAPER ESG response:

The City solicited proposals for the Emergency Shelter Grant funding. The City of Terre Haute received \$82,379 for FY 2007. Only two agencies submitted qualified applications; Catholic Charities and Council On Domestic Abuse. Each of these agencies met the required matching funds and supporting documents for eligible expenditures.

\$45,447 in ESG funds were expended in FY 2007 by Council On Domestic Abuse (CODA) for assistance in the operation of an existing shelter for victims of domestic violence (157 individuals received services). CODA exceeded the 1 for 1 match requirements (\$100,000) for their programs by funding from private contributions and in-kind services (Activities #380, #381, #398 & #399). Objective: Provide decent affordable housing. Outcome: Availability/Accessibility.

\$49,998 in ESG funds were expended in FY 2007 by Catholic Charities for the operation of an existing shelter for single women, women with children, and families with children (460 individuals received services). Catholic Charities exceeded the 1 for 1 match requirements (\$150,000) for their programs by funding from private contributions other government grants, in-kind services and cash donations

(Activities #382, #383, #384, #400, #401, & #402). Objective: Provide decent affordable housing. Outcome: Availability/Accessibility.

The Vigo County Homeless Coalition will continue to work with publicly funded institutions to request that they comply with guidelines similar to and following state mental health services for release of individuals to the community: Before an individual is discharged or placed on outpatient status, a discharge plan shall be formulated in consultation with the patient's designated case-manager. The superintendent shall provide copies of the individual's plan of discharge or placement to a community mental health center or a managed care provider serving the area in which the individual will reside. The plan must include the following: (1) A copy of the papers authorizing the discharge or placement; (2) An assessment of the individual's mental health; (3) The superintendent's recommendations concerning the follow-up treatment services and the specific residential placement that the individual should receive after the individual is discharged or placed; (4) If the individual has been placed on outpatient status, a description of the conditions relating to the individual's placement.

In addition to following the State of Indiana's Plan to end Chronic Homelessness, the Vigo County Homeless Coalition (VCHC) is continuing to develop networks within the area to educate members of our community about the needs of the chronically homeless. The VCHC believes that the more substance abuse residential treatment available, the more likelihood that those completing it will be able to obtain and keep permanent housing. Members of the Coalition are working with the Sheriff's Task force on Jail overcrowding and the Compass II Methamphetamine Task Force. With Community YOUUnity's Project under construction and the Hamilton Center Project open, agencies participating in the Homeless Coalition are continuing to look for additional funding to provide case management services.

COMMUNITY DEVELOPMENT

Community Development

*Please also refer to the Community Development Table in the Needs.xls workbook.

1. Assessment of Relationship of CDBG Funds to Goals and Objectives
 - a. Assess use of CDBG funds in relation to the priorities, needs, goals, and specific objectives in the Consolidated Plan, particularly the highest priority activities.
 - b. Evaluate progress made toward meeting goals for providing affordable housing using CDBG funds, including the number and types of households served.
 - c. Indicate the extent to which CDBG funds were used for activities that benefited extremely low-income, low-income, and moderate-income persons.
2. Changes in Program Objectives
 - a. Identify the nature of and the reasons for any changes in program objectives and how the jurisdiction would change its program as a result of its experiences.
3. Assessment of Efforts in Carrying Out Planned Actions
 - a. Indicate how grantee pursued all resources indicated in the Consolidated Plan.

- b. Indicate how grantee provided certifications of consistency in a fair and impartial manner.
 - c. Indicate how grantee did not hinder Consolidated Plan implementation by action or willful inaction.
4. For Funds Not Used for National Objectives
 - a. Indicate how use of CDBG funds did not meet national objectives.
 - b. Indicate how did not comply with overall benefit certification.
5. Anti-displacement and Relocation – for activities that involve acquisition, rehabilitation or demolition of occupied real property
 - a. Describe steps actually taken to minimize the amount of displacement resulting from the CDBG-assisted activities.
 - b. Describe steps taken to identify households, businesses, farms or nonprofit organizations who occupied properties subject to the Uniform Relocation Act or Section 104(d) of the Housing and Community Development Act of 1974, as amended, and whether or not they were displaced, and the nature of their needs and preferences.
 - c. Describe steps taken to ensure the timely issuance of information notices to displaced households, businesses, farms, or nonprofit organizations.
6. Low/Mod Job Activities – for economic development activities undertaken where jobs were made available but not taken by low- or moderate-income persons
 - a. Describe actions taken by grantee and businesses to ensure first consideration was or will be given to low/mod persons.
 - b. List by job title of all the permanent jobs created/retained and those that were made available to low/mod persons.
 - c. If any of jobs claimed as being available to low/mod persons require special skill, work experience, or education, provide a description of steps being taken or that will be taken to provide such skills, experience, or education.
7. Low/Mod Limited Clientele Activities – for activities not falling within one of the categories of presumed limited clientele low and moderate income benefit
 - a. Describe how the nature, location, or other information demonstrates the activities benefit a limited clientele at least 51% of whom are low- and moderate-income.
8. Program income received
 - a. Detail the amount of program income reported that was returned to each individual revolving fund, e.g., housing rehabilitation, economic development, or other type of revolving fund.
 - b. Detail the amount repaid on each float-funded activity.
 - c. Detail all other loan repayments broken down by the categories of housing rehabilitation, economic development, or other.
 - d. Detail the amount of income received from the sale of property by parcel.
9. Prior period adjustments – where reimbursement was made this reporting period for expenditures (made in previous reporting periods) that have been disallowed, provide the following information:
 - a. The activity name and number as shown in IDIS;
 - b. The program year(s) in which the expenditure(s) for the disallowed activity(ies) was reported;
 - c. The amount returned to line-of-credit or program account; and

- d. Total amount to be reimbursed and the time period over which the reimbursement is to be made, if the reimbursement is made with multi-year payments.
10. Loans and other receivables
 - a. List the principal balance for each float-funded activity outstanding as of the end of the reporting period and the date(s) by which the funds are expected to be received.
 - b. List the total number of other loans outstanding and the principal balance owed as of the end of the reporting period.
 - c. List separately the total number of outstanding loans that are deferred or forgivable, the principal balance owed as of the end of the reporting period, and the terms of the deferral or forgiveness.
 - d. Detail the total number and amount of loans made with CDBG funds that have gone into default and for which the balance was forgiven or written off during the reporting period.
 - e. Provide a List of the parcels of property owned by the grantee or its subrecipients that have been acquired or improved using CDBG funds and that are available for sale as of the end of the reporting period.
 11. Lump sum agreements
 - a. Provide the name of the financial institution.
 - b. Provide the date the funds were deposited.
 - c. Provide the date the use of funds commenced.
 - d. Provide the percentage of funds disbursed within 180 days of deposit in the institution.
 12. Housing Rehabilitation – for each type of rehabilitation program for which projects/units were reported as completed during the program year
 - a. Identify the type of program and number of projects/units completed for each program.
 - b. Provide the total CDBG funds involved in the program.
 - c. Detail other public and private funds involved in the project.
 13. Neighborhood Revitalization Strategies – for grantees that have HUD-approved neighborhood revitalization strategies
 - a. Describe progress against benchmarks for the program year. For grantees with Federally-designated EZs or ECs that received HUD approval for a neighborhood revitalization strategy, reports that are required as part of the EZ/EC process shall suffice for purposes of reporting progress.

Program Year 3 CAPER Community Development response:

In order to receive CDBG Entitlement funds, the City annually submits a one year Action Plan of proposed projects to meet the goals and objectives of the Consolidated Plan. The Action Plan is developed in accordance with the City's Citizen Participation Plan. As a result of this process, the following priorities were established for FY 2007:

1. Provide and sustain decent, safe and affordable housing.
2. Promote the provision of safe and decent, transitional and permanent housing for homeless and special needs persons and very-low income, at risk households.
3. Create and maintain suitable living environments for low/mod income residents

through neighborhood revitalization activities.

The City of Terre Haute uses a combination of CDBG and HOME funds to address affordable housing issues. CDBG funds are primarily used to rehabilitate rental housing units, and HOME is used to rehabilitate rental housing units and construct new housing units. 15-18 units were proposed for FY 2007.

1. One hundred fifty (150) income eligible families/individuals will benefit from rental units that were rehabilitated with HOME funds.
2. Six (6) very-low income individuals will benefit from rental units being constructed with HOME funds to serve the chronically homeless.
3. Ninety-six (96) income eligible families/individuals will benefit from rental units that will be rehabilitated with CDBG funds.

The City of Terre Haute used CDBG and HOME funds to meet National Objectives, and complied with the overall benefit requirement for the activities completed during FY 2007.

Low/Mod Limited Clientele Activities: The City of Terre Haute did not fund any limited clientele activities during FY 2007 that was presumed benefit.

Low/Moderate Income Benefit: 82.47% of the City of Terre Haute's expenditures were for activities meeting the National Objective - benefiting low/moderate income persons, thereby complying with the 70% low/moderate income requirement for activities completed during FY 2007.

The City of Terre Haute regularly reviews the progress of projects in its Action Plan. If it appears that an activity cannot be completed, or that an activity will use substantially less funds than what was budgeted, the funds may be reallocated to another eligible activity. There were no substantial changes in the direction of programs budgeted in the FY 2007 Action Plan.

The City of Terre Haute pursued all resources indicated in the Consolidated Plan during FY 2007.

The City of Terre Haute provided the requested certifications of consistency for HUD programs in a fair and impartial manner as part of the annual Action Plan.

The City of Terre Haute supported applications by other entities. No partially funded projects were hindered because of inaction on the part of the City.

Planning and Administrative expenses: \$367,386 in CDBG funds were expended in FY 2007, or 19.02% of the City's eligible CDBG expenditures. \$63,956 in HOME funds were expended for Planning and Administrative expenses in FY 2007. These expenditures are within the required limitations for Planning and Administrative costs.

82.47% of the City's CDBG expenditures were for activities meeting the National Objective: benefiting low/moderate income persons, thereby complying with the 70% low/moderate income requirement for activities completed during FY 2007.

The City of Terre Haute did not undertake any acquisition, rehabilitation or demolition activities that involved occupied real property. All of the activities the

City undertook, involved vacant or abandoned real property. No displacement occurred as a result of these activities. Consistent with the goals and objectives of 24 CFR Part 570.606 and Part 92.353, the City of Terre Haute commits to making all reasonable efforts to ensure activities undertaken with Federal funds will not cause unnecessary displacement or relocation of persons.

The City of Terre Haute did not undertake any Low/Mod Job Activities during FY 2007.

See Financial Summary Attachment (with COPR26 Report) for information on Program income; Prior Period Adjustments; Loans and other receivables; and Lump sum agreements.

Housing Rehabilitation

CDBG Funds were used with Mother Theodore Corp. II to complete the rehabilitation of 150 multi-family rental housing units for income eligible individuals. CDBG funds were used as a 10-year forgivable mortgage for approximately 90% of the cost of construction. HOME Funds are being used with Mother Theodore Corp. II to complete the rehabilitation of 96 multi-family rental housing units for income eligible individuals. HOME funds were used as a 5-year forgivable mortgage for approximately 90% of the cost of construction.

The City of Terre Haute does not currently have any HUD-approved NRA's.

Antipoverty Strategy

1. Describe actions taken during the last year to reduce the number of persons living below the poverty level.

Program Year 3 CAPER Antipoverty Strategy response:

Terre Haute Housing Authority's Self-Sufficiency continues the type of programs that will guide and support families to empower them to take control of their lives and become independent, productive members of the community and taxpayers. This has been achieved with support from the Western Indiana Employment and Training Services, Indiana Workforce Development, T.A.N.F-U.P., Vigo County Head Start, 4-C Child Care, Ryves Hall, Catholic Charities' free medical and dental clinics, Vigo County Adult Stay Well clinic, Consumer Credit Counseling, Area 7 Agency on Aging, along with other agencies, educational facilities and private businesses that have committed time and resources to their programs.

The City of Terre Haute continues to work with all agencies to identify barriers and issues related to poverty, including those concerns with the number of persons struggling with mental health, substance addictions and abuse problems.

The Department of Redevelopment and Terre Haute Housing Authority help supply single-family and multi-family housing for those individuals in poverty and will continue to do so in the future. When rehabilitating or constructing new housing, the City requests the contractor to employ, when possible, low income individuals from the area. The City of Terre Haute continues to work with and support local

organizations in an effort to eliminate poverty and assist low income residents with purchasing affordable housing.

NON-HOMELESS SPECIAL NEEDS

Non-homeless Special Needs

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Identify actions taken to address special needs of persons that are not homeless but require supportive housing, (including persons with HIV/AIDS and their families).

Program Year 3 CAPER Non-homeless Special Needs response:

Persons with special needs are the elderly and frail elderly, persons with severe mental illness, persons with disabilities, persons with addiction disorders, persons with HIV/AIDS and related diseases, families, single custodial parents and youth. These groups are not necessarily at risk of becoming homeless but may require supportive housing and services. The income of these individuals are below the level of moderate-income (80% MFI) and, because of particular social, economic or health related circumstances, may have greater difficulty acquiring or maintaining affordable housing. The greatest need expressed by all of the agencies the City works with is insufficient funding for supportive services. Each agency has a large waiting list for needed services, and some subpopulations, have no services (counseling, treatment, etc.) available to them. Supportive housing funds are also a priority issue. Agencies providing these services state that there is a much greater need than what the existing funds allow them to assist.

The City of Terre Haute identified the following as populations that necessitate assistance with transitional and affordable housing: elderly, veterans, chronic substance abusers, persons with mental illness, persons with dual-diagnosis, and persons with HIV/AIDS. The City collaborates with and supports several local organizations that carry out such activities. The City will continue to support these organizations. No significant changes have been made to the process.

Specific HOPWA Objectives

*Please also refer to the HOPWA Table in the Needs.xls workbook.

1. Overall Assessment of Relationship of HOPWA Funds to Goals and Objectives
Grantees should demonstrate through the CAPER and related IDIS reports the progress they are making at accomplishing identified goals and objectives with HOPWA funding. Grantees should demonstrate:
 - a. That progress is being made toward meeting the HOPWA goal for providing affordable housing using HOPWA funds and other resources for persons with HIV/AIDS and their families through a comprehensive community plan;
 - b. That community-wide HIV/AIDS housing strategies are meeting HUD's national goal of increasing the availability of decent, safe, and affordable housing for low-income persons living with HIV/AIDS;

- c. That community partnerships between State and local governments and community-based non-profits are creating models and innovative strategies to serve the housing and related supportive service needs of persons living with HIV/AIDS and their families;
 - d. That through community-wide strategies Federal, State, local, and other resources are matched with HOPWA funding to create comprehensive housing strategies;
 - e. That community strategies produce and support actual units of housing for persons living with HIV/AIDS; and finally,
 - f. That community strategies identify and supply related supportive services in conjunction with housing to ensure the needs of persons living with HIV/AIDS and their families are met.
2. This should be accomplished by providing an executive summary (1-5 pages) that includes:
- a. Grantee Narrative
 - i. Grantee and Community Overview
 - (1) A brief description of your organization, the area of service, the name of each project sponsor and a broad overview of the range/type of housing activities and related services
 - (2) How grant management oversight of project sponsor activities is conducted and how project sponsors are selected
 - (3) A description of the local jurisdiction, its need, and the estimated number of persons living with HIV/AIDS
 - (4) A brief description of the planning and public consultations involved in the use of HOPWA funds including reference to any appropriate planning document or advisory body
 - (5) What other resources were used in conjunction with HOPWA funded activities, including cash resources and in-kind contributions, such as the value of services or materials provided by volunteers or by other individuals or organizations
 - (6) Collaborative efforts with related programs including coordination and planning with clients, advocates, Ryan White CARE Act planning bodies, AIDS Drug Assistance Programs, homeless assistance programs, or other efforts that assist persons living with HIV/AIDS and their families.
 - ii. Project Accomplishment Overview
 - (1) A brief summary of all housing activities broken down by three types: emergency or short-term rent, mortgage or utility payments to prevent homelessness; rental assistance; facility based housing, including development cost, operating cost for those facilities and community residences
 - (2) The number of units of housing which have been created through acquisition, rehabilitation, or new construction since 1993 with any HOPWA funds
 - (3) A brief description of any unique supportive service or other service delivery models or efforts
 - (4) Any other accomplishments recognized in your community due to the use of HOPWA funds, including any projects in developmental stages that are not operational.
 - iii. Barriers or Trends Overview

- (1) Describe any barriers encountered, actions in response to barriers, and recommendations for program improvement
 - (2) Trends you expect your community to face in meeting the needs of persons with HIV/AIDS, and
 - (3) Any other information you feel may be important as you look at providing services to persons with HIV/AIDS in the next 5-10 years
- b. Accomplishment Data
- i. Completion of CAPER Performance Chart 1 of Actual Performance in the provision of housing (Table II-1 to be submitted with CAPER).
 - ii. Completion of CAPER Performance Chart 2 of Comparison to Planned Housing Actions (Table II-2 to be submitted with CAPER).

Program Year 3 CAPER Specific HOPWA Objectives response:

The City of Terre Haute does not receive HOPWA funding.

OTHER NARRATIVE

Include any CAPER information that was not covered by narratives in any other section.

Program Year 3 CAPER Other Narrative response:

None