



September 14, 2020

Elspeth Hilton  
Director of Community Services  
Indiana Housing and Community Development Authority  
30 South Meridian Street  
Suite 900  
Indianapolis IN – 46204  
CC: : [communityservices@ihcda.in.gov](mailto:communityservices@ihcda.in.gov)

RE: Prosperity Indiana comments on PN-20-35 Emergency Solutions Grant CARES Act Round 2

Dear Ms. Hilton:

Thank you for your thoughtful work in helping to respond to critical homeless prevention and housing stability needs in the face of the COVID-19 pandemic through the prioritization of federal resources as outlined in the draft plans for allocation of Round 2 of the Emergency Solutions Grant CARES Act (ESG-CV) funding. In large part, **our comments today do not object to the proposed new activities in the amendment, but instead demonstrate our concern about the continuing missed opportunities of the State of Indiana not providing a coordinated COVID-19 housing stability policy response that aligns ESG-CV alongside current and newly-available CARES Act funds.**

Our membership, comprised of nearly 200 organizations, is dedicated to creating inclusive opportunities that build assets and improve lives throughout every region of our state. Our network is diverse, but united by a mission to transform Hoosier communities. In particular, our members are dedicated to strengthening communities that are economically distressed through comprehensive solutions in rural, urban, and suburban neighborhoods. Expanding access to safe, affordable housing and economic opportunity are at the core of that work.

Prosperity Indiana members not only meet basic human needs, such as providing food and shelter, but ensure low-income Hoosiers have the kinds of tools and resources required to attain and maintain economic sufficiency. We actively engage our membership on policy issues through a variety of mediums to identify areas where community development approaches are effective, and where they should be improved upon to be responsive to local needs. Our



members have been greatly involved in the COVID-19 pandemic response and their resources strained by attempts to assist the hardest-hit Hoosiers and their communities in the ensuing economic fallout.

As part of Prosperity Indiana's efforts to ensure housing stability during and after the COVID-19 public health emergency and economic recession, we have convened a group of advocates called the Hoosier Housing Needs Coalition (HHNC) with the mission to ensure that no Hoosier is evicted or made homeless due to the pandemic. Over the nearly six months since Indiana's first COVID-19 public health emergency was declared, the HHNC has urged Indiana's state policymakers to create and enact a coordinated housing stability policy response that takes into account the needs of Indiana's renters, landlords, and communities. The coalition has issued multiple recommendations with options to leverage available federal, state, and third-party funding to be able to assist as many of the [up to 313,000 Hoosier households at risk of eviction](#) as possible.

And while we greatly appreciate the state creating its Rental Assistance Portal that received over 36,000 applications over the six weeks it was open, it is clear that much more needs to be done to assist over 200,000 households who have not received help in order to prevent widespread public health and economic damage that would follow an 'eviction cliff'. Even before the CDC's national moratorium, we estimated [multiple waves of evictions](#) lasting well into 2021, and the moratorium merely pauses the clock on one wave which will resume in the dead of winter.

It is for these reasons that we have concerns that the proposed plans for ESG-CV2 funds spends time and effort now revising the process for using the state's allocation of CARES Act ESG funds into what appears to be a standalone effort, rather than incorporating this funding stream into a broader COVID-19 housing response able to accommodate the breadth of the state's housing stability crisis and using these resources to build long-term household and community security.

It is difficult to see from the proposed plan whether it is meant to be part of a broader housing stability policy response, or whether they will in effect alter the shuttered Rental Assistance Program portal is a way that narrows it down to an ESG-focused population. In either case, we are concerned that the state has not yet communicated the steps it intends to take to reopen the existing program using other funding streams, in order to fulfill the spirit of Governor



Holcomb's comments that Hoosiers are able to get the resources they need to avoid eviction and be stably housed throughout the pandemic.

For an example of additional available resources, on September 11, HUD issued [Advisory No. 20-143](#), with new allocations of Community Development Block Grants (CDBG) funds from the CARES Act specifically focused on preventing evictions through rental assistance. These allocations include \$14.6M to Indiana's entitlement cities and counties, and \$12.6M in CDBG-CV3 funds to Indiana's non-entitlement use, for a total of over \$27.3M that the state can use for what HUD says "can be used to provide temporary financial assistance to meet rental obligations for up to 6 months." The advisory also includes Secretary Ben Carson's statement "The Trump Administration has maintained that no one should risk losing their home due to the coronavirus."

For the proposed ESG plan to make a meaningful impact on the scope of Indiana's housing stability crisis, the state must act quickly to incorporate both the ESG-CV2 and CDBG-CV3, as well as other remaining CARES Act funds to re-open the Rental Assistance Program well before the end of the CDC's moratorium.

A specific recommendation we have for this plan is in response to concerns with the previous iteration of the state's rental assistance programs. We recommend that the eligibility language in this plan around income "documentation requirements and also COVID-19 impact" be adjusted so that renters who have seen their ability to earn income in any way are able to be eligible. This comes from feedback from service providers whose clients are in need of this assistance and who may have had work hours reduced or who are otherwise impacted by COVID-19 but may not be able to show documentation on demand.

We are also concerned by a lack of language in this plan about transparency on outcomes. While we have no objection to the specific activities listed, including landlord outreach and hazard pay, it is unclear from the proposal how this spending fits into the overall plan. It is also important for advocates and service providers to have reliable data on program outcomes in order to better serve Hoosiers and their communities. To that end, the HHNC recommends the state include a '[Housing Stability Dashboard](#)' on its COVID-19 website with data on evictions and rent assistance and homelessness prevention program outcomes. This would provide transparency on where applications are coming from, whether [most-impacted areas](#) are being



equitably served, reasons why applications are denied, and current information about the balance of funds left in the program. This information is critical to informing where program modifications need to be made and why, and the extent to which the state's current housing stability efforts are meeting the scope of need.

We sincerely hope to increasingly partner with IHEDA and other state staff and leadership to work towards shared housing and community development goals both during the COVID-19 response and beyond its recovery. On behalf of our dedicated membership affecting positive change in communities throughout the state, we would like to thank IHEDA for the opportunity to weigh in on this draft plan and hope to work collaboratively with you on its implementation.

Sincerely,

Andrew Bradley  
Policy Director  
Prosperity Indiana  
317-222-1221, ext. 403