CITY OF INDIANAPOLIS
DEPARTMENT
OF METROPOLITAN DEVELOPMENT

Homeowner Repair Program Policies & Procedures Manual

Revised 5/2026

TABLE OF CONTENTS

TABLE OF CONTENTS *1*

INTRODUCTION *2*

PROGRAM DESCRIPTION *3*

DEFINITIONS *4*

HOMEOWNER REPAIR PROGRAM PROCESS *4*

Repair Planning 7

Repair 8

Project Completion 8

PROGRAM ELIGIBILITY REQUIREMENTS *10*

INCOME LIMITS AND QUALIFICATION *13*

ELIGIBLE REPAIRS *15*

Emergency Repair Process **17**

LIEN TERMS *18*

Micro-Purchases **24**

Sealed Bids **25**

Competitive Proposals **26**

Bidding Procedures **27**

Permits **30**

Change Orders **30**

CONSTRUCTION COMPLIANCE PROCESS *32*

Environmental Reviews **33**

Work Specifications **34**

Inspections **36**

TERMINATION POLICY AND GRIEVANCE PROCEDURES *38*

OTHER REGULATORY REQUIREMENTS *41*

Relocation: **41**

Conflict of Interest: **42**

INTRODUCTION

The City of Indianapolis' Department of Metropolitan Development (DMD) administers a number of federal grant programs through a division within DMD known as the Division of Community Investments. Funded through a federal grant program, the Homeowner Repair Program (HRP) Team within the Division of Community Investments works to complete essential deferred maintenance repairs for low- and moderate-income homeowners. The Homeowner Repair Team works with other Community Investment employees to manage oversight, financial administration, and monitoring of the HRP. The Policies in this document are applicable to the HRP only. All policies not addressed within this section will be a part of the City of Indianapolis's General CDBG Policies and Procedures document.

PROGRAM DESCRIPTION

Homeowner Repair Program (HRP)

The Indianapolis HRP helps homeowners by assisting with essential deferred maintenance repairs to their home. The mission of the HRP is to ensure low- and moderate-income residents have access to resources to stabilize their home, address health and safety concerns, and sustain it as an asset.

The City of Indianapolis acknowledges how homeownership helps build generational wealth and the importance of maintaining the City's existing housing stock. To incentivize the ongoing affordability of the home, the HRP offers repairs in the form of a 30-year, deferred payment, 0% interest lien forgivable at year 30. Homeowners who sell their home during the 30-year period will be obligated to pay back the lien in full.

This program is funded by the Community Development Block Grant (CDBG), established by the Department of Housing and Urban Development (HUD), and City of Indianapolis funds. These grants are used to provide decent housing and a suitable living environment and to expand economic opportunities. This program is targeted only for persons earning less than 80% of the area's median family income and/or activities that will prevent or eliminate slum and blight. For more information, please visit the website located at https://www.hudexchange.info/programs/cdbg/

It is important to note this program will be a homeowner driven process. The roles of the City staff, partner organizations and contractors are to serve the homeowner, the client of the program. The homeowner is undertaking a lien for what is likely their largest asset. The program will be limited to homes located within the City of Indianapolis. The program will provide Homeowner Navigators to guide homeowners through the process. Lastly, the City will subcontract with various organizations that can complete certain scopes of repair activity.

HRP Team

The HRP Team will consist of a Principal Program Manager, Manager, and Navigators. The Homeowner Repair Navigator will have an assigned case load of HRP projects and will serve homeowners by walking alongside them through the process. Navigators will guide homeowners through the home repair process, applying for assistance through Indy.gov (RehabSpec pre-screen) and (Qualification process), hiring contractors, and executing the lien.

The Homeowner Repair Principal Program Manager and Manager roles will write, develop and enhance the processes and systems, setup a contractor pool, create forms to document the application status, communicate with agencies and CDCs, develop and distribute marketing materials, report ongoing status, and act as Navigators, as required.

The HRP Team will also collaborate with the Construction Compliance, CDBG, Environmental and Finance teams to carry out and manage the program.

DEFINITIONS

AMI - Area Median Income
Program eligibility is determined by a client's percentage of the AMI. Participants in this program must have an AMI of less than 80%, as determined by HUD.

Applicant
Any individual homeowner who has applied on the website or has called for a Navigators help to apply.

CDC - Community Development Corporation
A private, non-profit corporation established to serve a specific geographic area.

CDBG
Community Development Block Grant provides the funding for the repairs which are federally funded. These require specific procedures to follow environmental reviews and CDBG specific tracking.

Change Order
A Change Order must be executed for any deviation, addition, or deletion made to the approved scope of work, design specifications, project timeline, or project budget **after** construction starts.

City Funds
Funds provided by the City of Indianapolis through the Metropolitan Development Commission either through Housing Trust Fund or General funding for repairs. These projects do not follow CDBG specific requirements. As of January 2026 these funds will be managed through a local CAC.

Contractor
A vendor for the city who has met the criteria to support the HRP.

Community Investments
A Division of the Department of Metropolitan Development of the City of Indianapolis responsible for administering federal grants.

Construction Compliance Team (Manager and Monitor)
The team will complete the scope and estimated costs of the project. They will also inspect the completion of the projects.

DMD - Department of Metropolitan Development
A Department of the City of Indianapolis-Marion County responsible for the oversight of housing and community development funds, planning, historic preservation, brownfield redevelopment, zoning, and economic development.

EMERGENCY

A project which has been deemed priority with input from the team as to whether it has lack of heat in winter, no running water, electric arcing issues, or sewage / septic blockages.

ERP
Environmental Review Proposal - used whenever addressing a repair to a registered historical building.

E-Verify
Title IV, Subtitle A, of the Illegal Immigration Reform and Immigrant Responsibility Act of 1996, requiring employers to verify and confirm the accuracy of Social Security numbers provided by all employees.

HRP Team
Principal Program Manager, Program Manager and Navigator(s) administering and executing the process

Household
All persons, whether related or unrelated, living in a housing unit.

HUD - United States Department of Housing and Urban Development
The Federal Department responsible for the implementation and administration of programs designed to provide assistance for housing and urban development, housing production and mortgage credit programs.

Invoice
Payment request submitted by a contractor after work is complete.

Mortgage
Statement showing up to date with payments.

Navigator
Individuals within the Homeowner repair team who help applicants throughout the whole process.

Owner-Occupied Repair (also known as Homeowner Repair)

Property Taxes
Checked on maps.indy.gov – ensure applicant is not behind on Property Taxes

Sub-recipient
Defined as a public agency or nonprofit organization selected by the entitlement city to administer all or a portion of the entitlement city's programs. Local government members of consortia that receive consortium funds and urban county members are also considered sub-recipients. DMD will only use sub-recipients in very limited instances.

HOMEOWNER REPAIR PROGRAM PROCESS

Intake Application Process – Please note all relative qualification documentation must be supplied within the first four weeks of applying for assistance. Re-application will be required after four weeks.

1. Homeowners with essential deferred maintenance needs should complete the brief "HRP – Prescreen Form" on indy.gov: Homeowner Repair Program (HRP) to assess their eligibility for the program. The Form will evaluate the homeowner's eligibility. Navigators will help guide homeowners through the form if they do not have computer access.

2. Homeowner Applicants will be determined to be categorically ineligible if any of the following apply:
   - The household lives outside of the city of Indianapolis.
   - The household has a gross annual income that equals or exceeds 80% of the Area Median Income
   - The household is not current on their property taxes to the most recent assessment
   - The applicant does not own the home or live in the home full-time
   - Requested repair is outside the scope of the program

3. If the homeowner's responses to the pre-screen survey indicate that they may be eligible for the program, they will receive a link to submit a web-based online application. Navigators will help guide homeowners through the form if they do not have computer access.

4. Homeowners must complete the web-based application in its entirety. The application will request documentation to be uploaded. Homeowners will receive confirmation that their application is received.

5. Eligible (See Eligibility and Income Limits sections below - CDBG and CDBG-DR Income Limits - HUD Exchange) applicants will be contacted by a member of the Homeowner Repair Team, who will confirm their eligibility by completing a full review of the household's income and assets, verifying the location of the home and property tax status, and assessing the repair needs.

6. A standard priority evaluation process will be used to assess all applications, based on the Homeowner need and program's eligibility criteria. Through this priority evaluation process, the Homeowner Repair Team will identify and prioritize eligible applicants.

7. Applicants will be notified which of their repair requests will be addressed through the program. The HRP Team will notify the homeowner of next steps and introduce the Housing Navigator assigned to their case.

8. Applicants with an "emergency or priority repair need" may be contacted by a staff member at a partner organization, who will verify their eligibility and begin their process.

Client Intake

1. Each application/address is assigned to a team member that serves as a Homeowner Navigator.

   The Homeowner Repair team will determine if the scope of the request qualifies for the emergency repair program. This determination may be in conference with the Construction Compliance Monitor and/or the homeowner and may be referred to a partner organization. See Emergency Repair section below.

1. Client is contacted by the homeowner navigator to learn about the program and requirements.
2. Client acknowledges that they understand the program and submits additional documentation for the income qualification process, as needed.
    a. Homeowner Navigator who is assigned explains what the program is, lead, radon, grant vs. lien components
    b. If documents are needed from the homeowner to complete the income calculation, it can be requested at this meeting.
3. The urgency of the repair need is assessed at the time of review of the application. Applicants with an "emergency repair need" may be contacted by a staff member at a partner organization, who will verify their eligibility and begin their process.
4. Homeowner Navigator will complete the income calculation for the homeowner and submit to the Manager for review.
5. Homeowner Manager reviews Homeowner Navigator income calculation and documentation for eligibility.

Repair Planning

1. Once a household is determined to be income qualified, the Homeowner Repair Team will collaborate with a Construction Compliance Monitor to define the scope of work.
2. Construction Compliance Monitor will call homeowner and schedule a visit. The homeowner may invite the Homeowner Navigator to attend this meeting.
3. During the visit, the Construction Compliance Monitor will:
    a. Discuss with the homeowner the scope of work, budgets, etc.
    b. Using lead tracking form, provide the owner with the required disclosure pamphlets.
    c. Take photos for ERP (front and back of home) and of work area.
4. Construction Compliance Monitor / Navigator will initiate a radon test and the lead paint test if the lead test is needed. These tests will be provided free of charge to the homeowner. Any results from these tests could influence a change in the scope of work. If the scope of work changes due to test results, the additional scope will be provided as a grant to the homeowner, not in addition to their lien.
    a. Home Owner Repair Team will provide the homeowner with an email / telephone number of the people who will be coming to complete the tests from the designated testing contractors.

b. The homeowner will work with the selected testing contractors to make arrangements for access to the house.

5. Construction Compliance Monitor will draft the scope of work.
    a. If radon test is a positive result, incorporate needed renovations into scope of work
    b. If lead test is a positive result, incorporate needed renovations into scope of work
6. The Environmental Review Team will issue a notice to proceed to the Homeowner Repair Team Project Manager.
7. HOMEOWNER REPAIR Project Manager to send notice to proceed to the Navigator.
    a. Navigator will share with the homeowner and will initiate the renovation process (step 1) below.

Repair

1. Construction Compliance Monitor and Navigator to set up another meeting, either in person or virtually/phone with the homeowner to provide and discuss contractor based on scope of work.
2. Homeowner will be advised of the contractor who will perform the work.
    a. Three-way agreement between contractor, homeowner, and City setting expectations, responsibilities and requirements.
    b. Homeowner signs lien agreement for the amount budgeted for the scope of work, minus any work required as part of a radon or lead test.
3. Work begins at the agreement of the homeowner and the contractor. Homeowner is to grant access to the home.
4. **CHANGE ORDERS** –
    a. Contractor will submit in writing the changes required or suggested to homeowner and Construction Compliance Monitor.
        i. *Considerations:*
            1. *Construction Compliance Monitor turnaround time, allow up to three (3) days.*
    b. Construction Compliance Monitor / Navigator will confirm the changes with homeowner and contractor, including having all three (Construction Compliance Monitor / Navigator, homeowner and contractor) sign off on the changes/increase in price.

Project Completion

1. Before completion, a series of clearance tests must be completed:
    a. If a Radon system was to be installed, a post-installation radon test must be completed to confirm that system is working.
    b. If lead paint regulations require it, a lead-based paint clearance test must be completed to confirm no lead hazards remain in the home where the work took place.
    c. The homeowner will work with the designated testing contractors to complete these tests by granting access to the home.
2. Once the Repairs are complete:
    a. The Construction Compliance Monitor will set up a time to meet with the homeowner and contractor, to go through the completion certificate and inspect the final work

with the contractor. The homeowner may invite the Homeowner Navigator as part of this meeting.

b. During this meeting:
    i. The Construction Compliance Monitor will inspect the work to ensure it has been completed and take photos of final work.
    ii. The Contractor will sign a warranty form and a no lien affidavit.
    iii. The homeowner, the contractor and the Construction Compliance Monitor will sign the completion certificate.
    iv. If a lien modification if necessary due to a change order, the Homeowner Navigator must attend the completion meeting.

3. The HRP Team will record the final note and mortgage.
    a. Recording fees are not charged to the homeowner.
4. Homeowner Repair Team will send a full package to homeowner of all paperwork associated with the renovation.
    a. Warranty, copy of the recorded mortgage and note, summary, lead pamphlets.

Send survey to homeowners who participate (or paper copy).

This notice is not a guarantee of work to be done, all projects are dependent upon available funding

PROGRAM ELIGIBILITY REQUIREMENTS

Income & Assets

The City will verify the income and assets of each Household member of the proposed assisted unit (all members of an owner-occupant household) utilizing the methods and forms described in the next section to determine income eligibility. Documentation will be placed in the client file. The household income must be at or below 80% AMI. The following income must be included:

- all adult household members (18 and over);
- unearned income for minors (under 18) such as Social Security benefits, or a Trust Income, must be disclosed and included in the household calculation
- temporarily absent family member regardless of the amount of income contributed;
- adult students living away from home (only the first $480 must be counted);
- for permanently absent family member (e.g. nursing home), you have the choice on whether to count that person's income.
- The household includes all persons occupying a housing unit, which includes related and unrelated people such as lodgers who share the housing unit. Therefore, we will include the income of the renter. The rental income is considered income under the IRS definition of income. Therefore, the rent payments to the family would also be included in determining household income.
- Reference the ***CPD Income Calculator*** to complete income calculations.

Verification of Property Ownership & Occupancy

Applicants must disclose their ownership relationship to the proposed assisted property as well as any other non-occupant owners or other investment owners with an interest in the proposed assisted property. Ownership does not include land contracts, contracts for deeds, installment contracts.

The City will determine that the applicant owns a property if one or more of the following are verified:

- Has fee simple title to the property
- Maintains a 99-year leasehold interest in the property
- Owns a condominium
- Owns or has a membership in a cooperative or mutual housing project that constitutes homeownership under state law
- For manufactured housing, land must be owned by the community land trust, must have a leasehold interest for at least 50 years or leased for a period at least equal to the duration of the affordability period
- Inherited property with multiple owners where title has been passed by inheritance to several heirs, not all of whom reside in the housing. Assistance can be provided to the owner-occupant when they: (1) are low-income, (2) occupy the housing as their principal

residence, and (3) pay all the costs associated with ownership and maintenance of housing (e.g. mortgage, taxes, insurance etc.)

- Has a life estate under which the occupant has the right to live in the housing for the remainder of his or her life and does not pay rent. Assistance can be provided to the person holding the life estate, provided the person (1) is low-income and (2) occupies the housing as his/her principal residence
- A living trust where the owner of a property has conveyed his or her property to a trust for their own benefit or the benefit of a third-party beneficiary. In this scenario, the trust holds legal title, and the beneficiary holds equitable title. The trustee is under a fiduciary responsibility to hold and manage the trust assets for the beneficiary. Assistance can be provided to the property if all beneficiaries of the trust qualify as a low-income household and occupy the property as their principal residence. The contingent beneficiaries who receive no benefit from the trust and have no control over the assets until the beneficiary is deceased, need not be low-income. The trust must be valid and enforceable and must ensure that each beneficiary has the legal right to occupy the property for the remainder of their life
- A beneficiary deed conveying interest in real property, including any debt secured by a lien on real property, to a grantee beneficiary designated by the owner and that expressly states that the deed is effective on the death of the owner. Upon death of the owner, the grantee beneficiary receives ownership in the property, subject to all conveyances, assignments, contracts, mortgages, and deeds of trust, liens, security pledges, and other encumbrances made by the owner or to which the owner was subject during the owner's lifetime. Assistance can be provided to the owner if he or she (1) qualifies as low-income and (2) occupies the housing as his/her principal residence
- Maintains an equivalent form of ownership approved by HUD

Households will be required to certify that they occupy the home as their primary residence at the time of application. Repairs will not be made on a home that is used as a secondary residence, unoccupied or rental property.

A copy of the verification of primary residence should be submitted for record retention with the applicant's files.

Property Insurance

If the homeowner has validated Property Insurance a copy should be submitted for record retention with the applicant's files.

The City will waive the property insurance requirement in limited instances, such as when the homeowner could obtain insurance but for the repair needs on the property.

The City will obtain either a third-party verification or source document indicating paid current property insurance coverage and levels and types of coverage on the proposed assisted property. Replacement Coverage must be equal to or greater than the assessed or appraised value and maintained at a level to cover any outstanding property debt liability plus the proposed level of

HRP Program funding provided. This will be for the first 12 months upon completion certificate signed.

Property Mortgage

If the homeowner has a mortgage, then the homeowner will verify the property mortgage is paid up to the most recent month. This requirement cannot be waived. If they are not up to date they do not qualify for the program.

HOA

If the homeowner has an HOA agreement, then the homeowner will verify the HOA payments are current with no balance due. If they are not up to date they do not qualify for the program.

Property Taxes

The City will verify the local property taxes have been paid up to the most recent assessment. This information will be maintained in the client file. This requirement cannot be waived.

Property Age

The City will verify the age of the property through local property assessment records (for example: MapIndy). A copy of the record will be placed in the client file. This information will not affect the household's eligibility for repairs but may influence the repairs required and referrals made by the City to other resources and programs.

This notice is not a guarantee of work to be done, all projects are dependent upon available funding

INCOME LIMITS AND QUALIFICATION

Individuals served under this program must meet the income limits established by HUD on an annual basis. Click following link to visit HUD income limit website (Income limits).

Requirement:
The City of Indianapolis will use the Part 5 Annual Income (24 CFR 5.609) method for determining income. Households must have an income that does not exceed the current year 80% AMI limit to be eligible for the program. The source documentation and income calculation must be kept in the client file. Income eligibility is based on gross household income, not net income after adjustments.

Source Documentation:
Homeowners will be asked to provide:

- Mortgage statement
- Homeowners Insurance declaration page
- No less than two consecutive months of paystubs,
- Six months of checking account statements,
- Two months of savings accounts,
- Latest two months of electronic wallet accounts
- Federal Income Tax return for previous year, and
- Latest retirement account statement
- Social security letter / Letter of benefits
- Proof of legal residency

All adult household members without income will be required to sign a "No Income Affidvait" confirming that they do not have income. This income documentation will be kept on file with the City of Indianapolis for a minimum of five years following the completion of the repairs.

The HRP Team will use DMD's Income Qualification Calculator to document and determine income eligibility. Eligibility is only allowable up to 12 months from the time the income eligibility was determined. Households who applied more than twelve months ago must provide updated documentation.

- **Exception:** A household is considered "categorically eligible" for the City of Indianapolis Homeowner Repair 'Emergency' Program if they are currently a beneficiary of at least one of the following programs. If the recipient can verify and document that the household receives benefits through one of these programs, then the recipient is not required to complete an income calculation.
    - SNAP (Supplemental Nutrition Assistance Program)
    - HIP (Healthy Indiana Plan)
    - SSI (Supplemental Security Income)
    - TANF (Temporary Assistance for Needy Families)
    - WIC (Special Supplemental Nutrition for Women, Infants, and Children)

- LIHEAP (Low Income Home Energy Assistance Program)
- LIHWAP (Low Income Household Water Assistance Program)

To document that a household is categorically income eligible, the recipient must have the household sign a copy of the "Certification of Categorical Income Eligibility Form" (HTF Categorical Income Eligibility Client Signature, available below and in the forms section HRP Policies and Procedures) and must obtain third-party documentation providing proof that the household receives the qualifying benefit e.g. A copy of a Benefit letter or card.

This notice is not a guarantee of work to be done, all projects are dependent upon available funding

ELIGIBLE REPAIRS

The following list denotes some eligible and ineligible construction activities under HRP Program contracts. Activities that are not listed as "acceptable" will require the written approval of the Homeowner Repair Team Manager, prior to the undertaking of the activity.

Required Repairs:

- Installation of smoke detectors
- Installation of carbon monoxide detectors
- Radon test
- As applicable, lead based paint test & applicable repairs.

Acceptable Repairs:

Types of repairs include but are not limited to: loss of heat; leaking or inoperable hot water tanks; loss of electric; sparking or inoperable dominant electrical outlets, to exclude rewiring; inoperable sump pumps; exterior gas line breaks; exterior sewer line damage; exterior water line breaks or lines cited by the Water Division for critical repair; (interior/exterior); utility services cited/tagged for critical repair; and/or conditions a Marion County Code Enforcement Officer or a Rehabilitation Technician has declared an emergency.

- Any repair to the structure or attached structures of the home (i.e., porches, attached garage, additions, etc.), such as:
    - Code enforcement violations,
    - Heating & Air Conditioning
    - Roof
    - Accessibility Modifications
    - Sewer Repair and/or septic, line damage, and inoperable sump pump, specific Marion County Health citations or BNS specific to health and safety.
    - Electrical – arcing, sparking or inoperable dominant electrical outlets
    - Plumbing, working toilet priority, leaking or inoperable water tanks, water line breaks,
    - Foundation
    - Flooring
    - Gutters
    - Broken Windows/Doors
    - Hazard Mitigation (Mold, Lead-based Paint, Radon, Asbestos, etc.)
    - Other
- Non-publicly owned steps, sidewalks and handrails allowing for access to the home, as per Indiana Residential Code
- Securing open cisterns that present a safety hazard
- Removal of trees, or trimming of branches that present an accessible hazard to the home

Unacceptable Repairs:

- Repairs or upgrades that are only cosmetic in nature and do not address an imminent threat to the health or safety of the homeowner
- Room additions
- Detached garages / Outbuildings
- Demolition of any structure, except where Federal Lead Based Paint Regulations mandate
- Repair to any accessory building (i.e., detached garages, sheds, doghouses, etc.) except where Federal Lead Based Paint Regulations mandate
- Flooring (unless a Health and Safety issue)
- Cabinets or hardware replacement
- Fence repair or construction except where Federal Lead Based Paint Regulations mandate
- Landscaping
- City owned property (i.e. sidewalks, steps)
- Appliances (contact Indiana Energy Savings Program)
- Mailboxes
- Storm doors
- Hose bib/spigots

Additionally, the City will not authorize repairs on any home that is currently being utilized as a secondary residence or rental property/unit.

See below for Emergency Repairs.

Emergency Repair Process

Homeowners with emergency requests must indicate the need for an emergency repair on their application. The HRP Team will prioritize these applications after confirming that the repair need does qualify as an emergency and that the homeowner is eligible to participate in the program. Income qualification for emergency repairs only does not need to meet the HUD specific requirements for 24 CFR 5.609.

DMD may administer emergency repairs through a local non-profit partner that is experienced in home repairs and capable of acting quickly when funds are available. Homeowners who identify an emergency repair need on their application will be asked to consent to their information being shared with this partner.

Any additional, non-emergency work to be completed on the unit may be considered a separate, less critical project. Non-emergency repair needs will be reviewed separately, and the homeowner may need to wait to receive less critical repairs as other households are served.

Emergency repairs can be:

- Lack of heat in Winter (October through March if less than 32 F)
- Sewage backup
- Electric arcing issues
- No water

Note: No HVAC in Summer months is not considered an emergency

All repairs through the HRP, including emergencies, will trigger radon and possibly lead-based paint compliance requirements. Please see: Office of Lead Hazard Control and Healthy Homes | HUD.gov / U.S. Department of Housing and Urban Development (HUD)

Radon and Lead Information

Hazard Mitigation: Radon

What is Radon?

Radon is a naturally-occurring, odorless, colorless, and tasteless radioactive gas. The gas can accumulate in enclosed spaces within dwellings, such as basements or crawlspaces. According to US EPA estimates, radon is responsible for about 21,000 lung cancer deaths every year and is the leading cause of lung cancer for non-smokers. For more information regarding the health risks of radon, please visit https://www.epa.gov/radon/health-risk-radon and https://www.epa.gov/radon/radon-standards-practice.

The EPA's action level for indoor radon is 4.0 picoCuries/Liter (pCi/L). Approximately one-third of Indiana residences contain radon exceeding that amount, but testing is the only way to know if a household is at risk of radon exposure. The Marion County Health Department has a licensed tester on staff that can conduct tests for homeowners and renters. For more information on the Marion County Health Department's Indoor Air Quality Program, please visit: http://marionhealth.org/indHomeowner Repair-air-quality-program/.

Required Repairs

All repair projects will be required to have a test completed by a licensed tester prior to the completion of other repairs. Typically, this will need to occur in the basement or crawlspace. If no such space exists, the test can be completed in an internal room on the first floor.

If the test results indicate that the property has radon levels below 4.0 picoCuries/Liter (pCi/L), no radon mitigation work is required. If the test results indicate that the property has radon levels exceeding 4.0 picoCuries/Liter (pCi/L), then a radon mitigation system must be installed.

Homeowners cannot opt-out of radon testing and mitigation, if applicable. The cost of radon testing and repairs will be provided as a grant and will not be included in the lien amount.

Hazard Mitigation: Lead-Based Paint

What is Lead-Based Paint?

Lead-based paint is paint or other surface coatings that contain lead equal to or exceeding 1.0 milligram per square centimeter or 0.5 percent by weight or 5,000 parts per million (ppm) by weight. Lead-based paint hazards are any condition that causes exposure to lead from dust-lead hazards, soil-lead hazards, or lead-based paint that is deteriorated or present in chewable surfaces, friction surfaces, or impact surfaces, and that would result in adverse human health effects.

HUD estimates that 35% of U.S. homes contain some lead-based paint. There are many health risks associated with lead-based paint. Lead paint is the most common source of lead exposure for U.S. children under the age of 6 and even low levels of lead can be severely harmful. In children, exposure to lead can cause nervous system and kidney damage, learning disabilities and decreased intelligence, poor muscle coordination, decreased muscle and bone growth, and hearing damage.

Although children are especially susceptible to lead exposure, lead can be dangerous for adults, too. In adults, exposure to lead can cause harm to a developing fetus, increased chance of high blood pressure during pregnancy, fertility problems in men and women, high blood pressure, digestive problems, nerve disorders, memory and concentration problems, and muscle and joint pain.

The Lead Safe Housing Rule applies to all federally-assisted housing, including repairs funded through the Community Development Block Grant (CDBG). Depending on the nature of work and the dollar amount of federal investment in the property, certain requirements will apply when handling lead-based paint.

Required Repairs

Some repairs are exempt from lead remediation activities. Some of the most common ones are:

- Building constructed after 1977, and
- Any rehab that does not disturb a painted surface, like a furnace installation

The Construction Management team will determine whether the repair is exempt. If the repair is not exempt, then the following may be required:

- If the cost of repairs is less than or equal to $5,000, a Visual Assessment by a Certified Visual Assessor must be completed to identify deteriorated paint. If no deteriorated paint is identified as part of the Visual Assessment, then no additional work is required. If deteriorated paint is identified, then repairs must be made to any physical defect in the painted component(s) that is/are causing paint deterioration by removing loose paint and other material from the surface to be treated and applying a new protective coating or paint. After Paint Stabilization is completed, a Clearance Report completed by a Certified Risk Assessor will be ordered to ensure that there is no longer a lead-based paint hazard.
- If the cost of repairs is greater than $5,000 but less than or equal to $25,000, then a risk assessment must be completed
- If the cost of repairs is greater than $25,000, an escalation process of approvals needs to be submitted to the Community Investment Administrator.

Homeowners cannot opt-out of lead-based paint evaluation. The cost of lead-based paint inspections, testing, and repairs will be provided as a grant and will not be included in the lien amount.

LIEN TERMS

All repairs will be provided as 30-year, 0% interest, deferred payment lien that is forgivable at year 30 if the home remains the primary residence for the homeowner during that period. DMD will record a "Mortgage" on the home for the amount of the lien. If the property changes ownership or ceases to be the primary residence of the homeowner who received the repairs during the 30-year period, then the lien will be immediately due to DMD. Once DMD has received payment, it will release the mortgage.

The lien amount will equal the cost of the project, minus exempted expenses.

Exempted expenses include HRP Team salary and project development; radon testing; radon mitigation system; lead risk assessment; Interim Controls or Abatement; lead clearance; radon clearance; and recording fees.

The City may at times also cover one year of home insurance if the homeowner does not have home insurance. This will be assessed case by case and would not be included in the lien.

If the owner passes away or becomes incapacitated, the balance of the years left on the lien can be assumed by inheritance if the inheritor occupies the property as their full-time residence.

EXAMPLE: At year 20 of your 30-year lien you become incapacitated or pass away and your child inherits your home. If they sell the home, then the above rules apply for sale of the property. If the child remains in the home as their permanent residence for the remaining 10 years of the lien, then it will be forgiven.

Questions about active mortgages may be emailed to indyhomerepair@indy.gov and DMDMortgages@indy.gov.

PROCUREMENT PROCESS

Setting up a Contractor: (HRP team completes this process)

1. Create a draft RFQual (request for qualifications)
2. Submit this to Procurement for approval – several levels of approvals are required
3. Procurement publish the RFQual for s specific timeline
4. Receive all the applications and ignore any after the deadline
5. Check all RFQual applications have the following:

a. Cover Letter

b. Contractor Application Form, including Organization name, contact name, address, phone number, and email address.

c. Qualifications Narrative to include:

1. General Information
2. Description of the organization & team.
3. Organizational chart with names and titles.
4. Special certificates and /or licenses.
5. Document capacity to address the scope of work.
6. Team Experience and Qualifications (resumes)
7. Detail each team member's role on this project (if applicable).
8. Detail each team member's certifications and or trainings.
9. Indicate which Anticipated Scopes will be completed using subcontractors.

Contractor shall be:

Licensed and bonded during the term of this Agreement. For further information, go to the following City of Indianapolis Business and Neighborhood Services web site: https://www.indy.gov/activity/contractor-licenses

Be in good standing with the City of Indianapolis, or not have any complaints under the Better Business Bureau regarding Contractor's work and performance.

Be able to complete the type of services that will be requested by local homeowners as outlined in 3.01. A scope of services will be drafted specific to each household; however, general services outlined above will be a part of the City contract.

Contractor shall obtain all necessary permits when required by federal, state, or municipal laws to cover the scope of services to be performed by the Contractor.

Three (3) business references; Letters of reference should be included in this section as well as listed in the Contractor Application Form – Attachment A.

e. Current Certificate of Liability Insurance – with the 'Consolidated City of Indianapolis' named as insured.

f. Copy of MBE/WBE/XBE Certification – if applicable. Check Master spreadsheet in Office of Minority Women in Business on indy.gov.

All applicants must be reviewed and approved by the Compliance Officer in the Office of Minority Women in Business.

Once all information has been submitted a Requisition and DCS input must be completed.

DCS requires a copy of:

1. COI
2. Sam.gov dated copy of registration and no debarment (within 7 days)
3. Profession Services Agreement (with contractor name, address etc)
4. Email from office of Minority Women Business – Contract Compliance Officer
5. XBE letter (if applicable)

Contact the CDBG team (Grants analyst) to set up the Contractor for a Requisition number and PO:

1. HRP team decide which contractors to go through with
2. Let CDBG team know the contractors - they will need to be a registered vendor with the City so they can get them set up
3. Once they are a registered vendor, CDBG will set up a requisition. This basically sets aside funding for the relevant contractor
4. DMD admin enters all of the documents into DCS to get the contract process started. DMD admin needs to requisition #, which is why CDBG have to set up the req first.
5. Contract gets signed
6. CDBG grants analyst attaches contract to the requisition in PeopleSoft and then Finance team creates a PO
7. HRP team send PO to contractor - they are now ready to submit claims/invoices for reimbursement

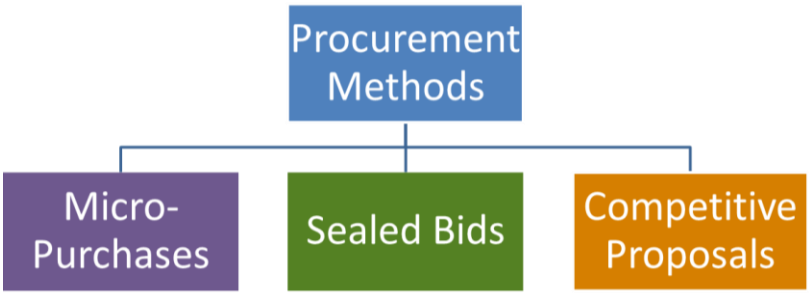
HRP team's main responsibilities in this process:

1. Ensure that new contractors are all set up with vendor registration in PeopleSoft before we start full contract process.
2. Tell CDBG analyst the contractor (vendor number would be helpful as well - this is also called Supplier ID in PeopleSoft)
3. Work with DMD admin to get all necessary documentation for DCS and help prepare contract

Procurement Team process

- Procurement Method will determine the process up to contract execution.
- Procurement Methods will comply with this link:
  2 CFR 200.320 (c)

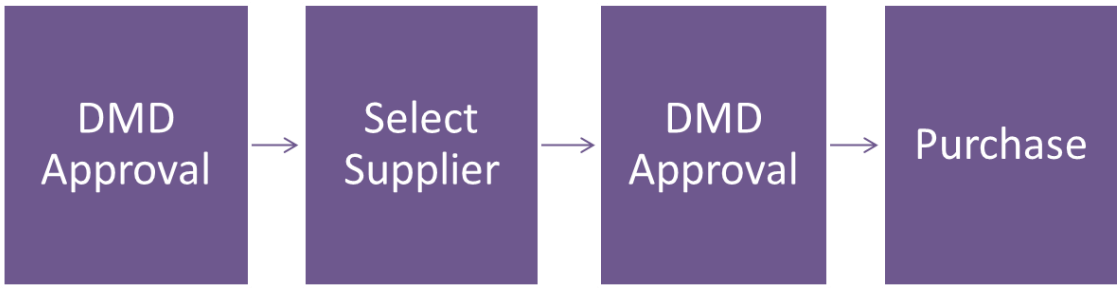
Also see: Playing by the Rules: Procurement and Contracting



Micro-Purchases

- Micro-purchases of less than $10,000 do not require competition or a cost/price analysis.
- Micro-purchases may be awarded without soliciting competitive quotations IF the Construction Compliance Monitor in conjunction with the HRP team considers the price to be reasonable.
- Any number of purchases from a single vendor for one project site will be viewed as a single purchase subject to the $10,000 limit, even if the individual items are all under $10,000.

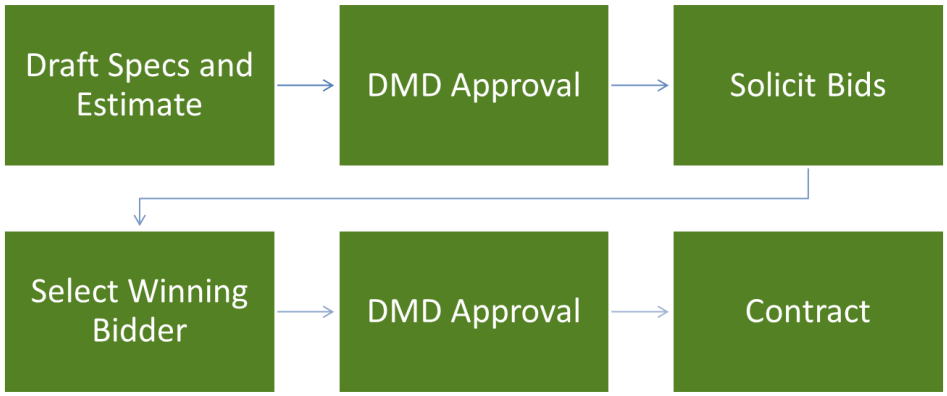
Micro-Purchase Process



Sealed Bids

- Sealed bids are the preferred method for procuring construction, if the conditions below apply:
  - A complete, adequate, and realistic specification or purchase description is available;
  - Two or more responsible bidders are willing and able to compete effectively for the business; and
  - The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price. (2 CFR 200.320 (c))

Sealed Bid Process



Solicit Bids

- Bids must be solicited from contractors in the on-call contractor pool providing them sufficient response time prior to the date set for opening the bids.
- The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services for the bidder to properly respond.
- DMD will make a concerted effort to solicit bids from qualified XBE contractors.
- If a minimum of two bids are not received, Construction Compliance Team and / or HRP Team must document the efforts made to ensure an open competition (such as a public notice requesting bids).

Select Winning Bidder

- Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest.
- Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
- Any or all bids may be rejected if there is a sound documented reason.
- A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder.
- Selected Contractors must be:

- Bonded, licensed, and insured
- Not debarred on Sam.gov
- Have a UEI number (if applicable)
- Without any conflict of interest to the DMD employees
- Registered with an E-verify form
- Not awarded to a construction manager, who does self-performing work

DMD Approval

- Project submit all bids to the HRP Program Manager for approval, not just the two lowest.
- The City reserves the right to reject all bids and may waive or allow a bidder to correct errors, omissions, or other irregularities in bid.
- HRP Manager completes the Bid Approved Date and adds an Approval signature.

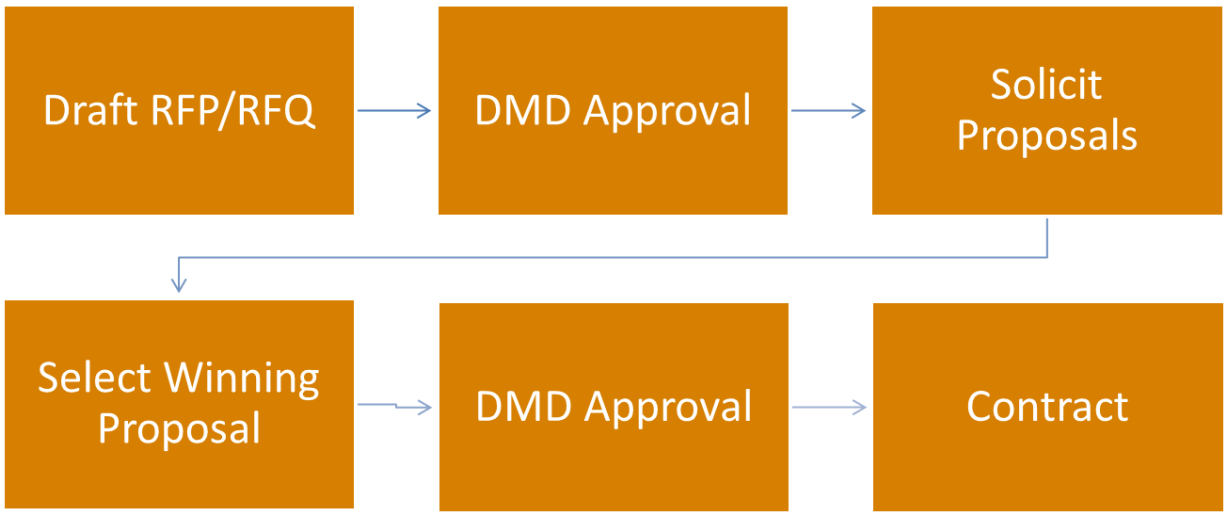
Contract

- After HRP Manager approval, the HRP team may contract with selected bidder.

Competitive Proposals

- Preferred method for procurement when conditions are not appropriate for the use of sealed bids. eCFR :: 2 CFR 200.320 -- Procurement methods.
- RFQ process will be used for the contractor pool:

Competitive Proposal Process



Draft RFQ

- Requests for proposals must identify all evaluation factors and their relative importance.

- HRP Team will use competitive proposal procedures for qualifications-based procurement (RFQ) of Contractors for the on-call contractor pool, whereby competitors' qualifications are evaluated, subject to negotiation of fair and reasonable compensation.
- Selected Contractors must:
  - Be bonded, licensed, and insured
  - Not be debarred on Sam.gov
  - Without any conflict of interest to the DMD employees
  - Registered with an E-verify form

DMD Approval

- The City reserves the right to reject any and all proposals and may waive or allow a respondent to correct errors, omissions or other irregularities in proposal.

Contract

- Construction Compliance Monitor and Homeowner Repair Team Manager, and Homeowner approve the Contract.

Bidding Procedures

Contractors must comply with procurement standards to ensure that supplies, construction and other services acquired in whole or in part with federal funds are obtained in a manner that fosters open and free competition.

1. Contractors must solicit goods and services based on a clear and accurate description of the material, product or service to be procured and cannot contain features which unduly restrict competition, such as:

    - unreasonable qualifying requirements.
    - unnecessary experience or excessive bonding requirements.
    - specifying only brand name products, without allowing a "pre-approved equal" product.
    - non-competitive pricing practices between firms or affiliated companies; or
    - non-competitive awards to consultants on retainer contracts.

2. HRP team must solicit bids from an adequate number of qualified sources. All purchases or expenses from a vendor expected to exceed **$10,000** will attempt to receive **three bids** for Homeowner Repair projects. An estimate is required from the contractor but will not be eligible to count as one of the two bids. All bids must be based on approved specifications, in writing and signed by the contractor. If an adequate number of bids are not received, HRP team must document the efforts made to ensure an open competition (such as a public notice requesting bids). City staff may request solicitation of a third bid at its discretion.

- Notices or instructions to bidders must include an open and close date. If an extension is needed, the proper notification must be submitted to all prospective bidders to ensure fair and open competition. A Construction Compliance Monitor will ensure compliance.
- No bids will be accepted after the close date.
- All prospective bidders must receive the same Notice/Instruction to bidders.
- Questions or changes to bid documents must be answered in the form of an addendum to all prospective bidders. All such addenda must be acknowledged by the Bidder and will become a part of the Contract Documents. The City will not be responsible for or bound by any oral or written interpretations or clarifications of the Contract Documents which anyone presumes to make on its behalf, except by an Addendum.
- No negotiating may take place during or after bidding. You may accept alternate bids. Any changes will be in the form of a change order and must be approved by the Construction Compliance Monitor prior to contract/change order signing.
- All bids must be based on approved specifications, in writing and signed by the contractor. If an adequate number of bids are not received, HRP team must document the efforts made to ensure an open competition (such as a public notice requesting bids). City staff may request solicitation of a third bid at its discretion.
- If bids are expected to exceed **$150,000** in Federal Grant Funds, the HRP team must publish a public notice requesting bids in a local newspaper or a pre-approved equivalent alternative, specifying where bid packages may be obtained and a due date for bid submission.
- All bids received by the HRP team shall be organized, collated, and reviewed for accuracy and thoroughness.
- If only one bidder responds, the procurement process will be the same as if multiple bidders responded. Award of the contract will be made to the lowest, responsive and responsible bidder and will be compared to a cost analysis.
- If bids are within 10% of the HRP teams approved estimate, an additional bid approval is not required by a Construction Compliance Monitor.
- The City reserves the right to reject any and all bids and may waive or allow a bidder to correct errors, omissions or other irregularities in bid documents that are found not to have afforded the bidder a substantial competitive advantage over other bidders.
- Projects must be awarded to the lowest, most responsive and responsible bidder, within the project's budgetary estimate.

3. If an individual expense or purchase from a single vendor is expected to be less than **$10,000**, the purchase may be eligible as a micro-purchase. The HRP team must still comply with all applicable policies, such as the environmental review, specifications, estimates and approvals even though only **one bid** is required.
    - Micro-purchases of less than $10,000 do not require competition or a cost/price analysis
    - May only be used for up to $2,000 for construction awards which are subject to the Davis-Bacon Act.
    - Micro-purchases may be awarded without soliciting competitive quotations IF the Construction Compliance Monitor considers the price to be reasonable.

- Any number purchases from a single vendor for one project site will be viewed as a single purchase subject to the $10,000 limit, even if the individual items are all under $10,000.

4. The HRP Team must ensure that the award is:

   - Made to contractors, with the lowest and most responsible bid and able to perform successfully under the terms and conditions of the proposed contracts;
   - Made to contractors who are licensed, bonded and insured as required by the City of Indianapolis' Department of Code Enforcement.
   - Not made to any party which is debarred or suspended or is otherwise excluded from or ineligible for participation in federal assistance programs;
   - HRP Team must go to the SAM - System for Award Management website to check contractor's registration and debarment status.
   - HRP Team must print the screen that shows the contractors non-debarment status. This screen print must be maintained in client/contractors file.
   - Not made to any contractor or persons that participated in the development or drafting of specifications, requirements, statements of work, invitations for bids and/or other requests for proposals.
   - Not made to a construction manager, who does self-performing work.

5. No modifications and/or addenda can be made to a bid without prior approval of the City Construction Compliance Monitor.

6. If a pre-qualified list of contractors is used, it must be developed through an open solicitation that allows entry of other firms at any time during the solicitation period. They must also include an adequate number of qualified sources.

7. Minority Business Enterprises (MBE's), Women Business Enterprises (WBE's), Veteran Business Enterprises (VBE's) and Disabled Business Enterprises (DBE's) shall have the maximum feasible opportunity to participate in the performance of Federal contracts. In order to achieve significant utilization of minority, veteran, women, and disabled-owned businesses, the City is requesting all Contractors, who receive Federal Entitlement funds for construction activities, to make a good faith effort to meet and carry out the following policies:

   - A minimum of 15% of the total contract amounts awarded for construction work, for which any portion of the funds provided by the grant agreement are utilized, are encouraged to be awarded to MBE contractors.
   - A minimum of 8% of the total contract amounts awarded for construction work, for which any portion of the funds provided by the grant agreement are utilized, are encouraged to be awarded to WBE contractors.
   - A minimum of 3% of the total contract amounts awarded for construction work, for which any portion of the funds provided by the grant agreement are utilized, are encouraged to be awarded to VBE contractors.

- A minimum of 1% of the total contract amounts awarded for construction work, for which any portion of the funds provided by the grant agreement are utilized, are encouraged to be awarded to DBE contractors.
- When the HRP Team awards a General Contractor (GC) or a Construction Manager (CM) the total contract for construction work, and the GC and CM is a MBE, WBE, VBE or DBE entity, their entire contract amounts may be counted towards the minimum percentages above.
- When the HRP Team awards a GC or CM the total contract for construction work, and that GC or CM is not a MBE, WBE, VBE or DBE entity, the subcontracted amounts are encouraged to meet the minimum percentages above.

8. All bids received by the HRP team shall be organized, collated, and reviewed for accuracy and thoroughness.

9. Any organization or individual being reimbursed through federal funds must be competitively procured in some fashion.

EMERGENCY projects

All emergency funded projects will use the City funded dollars and not follow HUD specific requirements for Contractors. Contractors will be assigned projects as they are available and capable.

Permits

All funded projects will require a building permit pursuant to City of Indianapolis Department of Code Enforcement rules and regulations; e.g.; electric service panel. Contractors will coordinate the required Permits.

Change Orders

A Change Order may be required if additional repair needs are identified after the original work specifications are created.

Anything that is added or removed from the original work specifications must be approved by the:

- Construction Compliance Monitor;
- Homeowner; and
- Contractor.

No changes will be accepted after the agreement with the homeowner.

Some changes may be new work scopes, rather than change orders, and may require a new application. Changes may impact the environmental and historic reviews, meaning that additional approvals are needed before work can begin. This can drive retesting of Radon and Lead depending on the scope of change.

CONSTRUCTION COMPLIANCE PROCESS

The HRP Team will follow DMD procurement standards to ensure that supplies, construction and other services acquired in whole or in part with federal funds are obtained in a manner that fosters open and free competition.

Federal funds require competitive procurement. Contractors completing home repairs are competitively procured through an application process and added to a contractor pool. Bids are solicited from contractors in the pool who are qualified and licensed to complete the specific repair type.

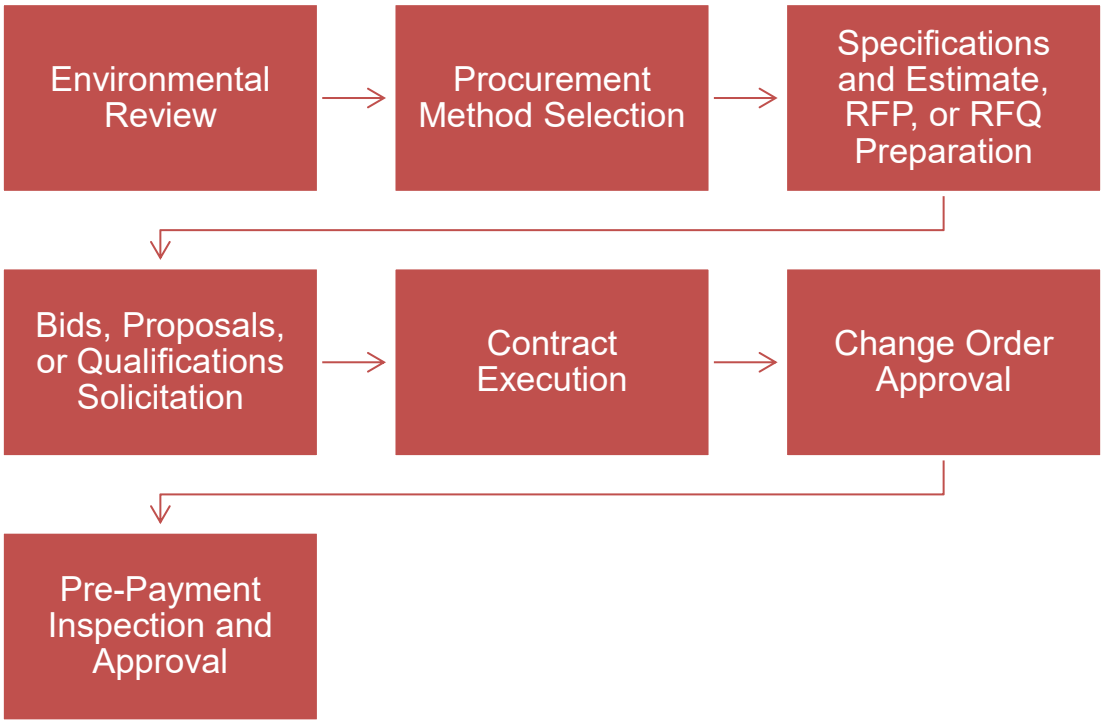
Overall Process

1. The HRP Navigator will contact or meet the homeowner to identify any eligible repairs.
2. The Construction Compliance Team will develop a scope of work and present it to the homeowner for approval.
3. The Construction Compliance Team will develop work specifications and an estimate.
4. The Construction Compliance Team in conjunction with the HRP team will solicit bids proposals, or qualifications from the contractor pool. Only responses from contractors who are qualified and licensed to complete the specific repair type(s) identified will be accepted.
5. The Construction Compliance Team in conjunction with the HRP team, will select the lowest and most responsive bid and will enter into a contract with the contractor.
6. The Contractor capacity and lead time will also be assessed depending on the urgency of the project.
7. Before approving payment to the contractor, the Construction Compliance Team will conduct a final inspection to ensure that the repair work meets the work specifications and applicable local and state codes.
8. The Homeowner, Contractor, and Construction Compliance Team member will sign a Certificate of Completion of Work approving the repairs.



Environmental Reviews

Before work specifications will be approved or funds disbursed, an environmental review must be performed on all projects receiving federal funds.
https://www.hudexchange.info/programs/environmental-review/



1. The selected Contractor will test for the presence of radon. If the radon test shows radon is greater than or equal to 4.0 pCi/L, the Construction team must incorporate radon mitigation into the scope of work.

2. The HRP team / Navigator will submit a web-based Environmental Review Proposal (ERP) Form to start the historic and environmental review process.

3. Proposals for repairs that are in historic areas and/or include ground disturbing work will be sent to the State Historic Preservation Office (SHPO) to review. This review may take up to 30 days.

4. Once the report from SHPO is received, the City will initiate the Environmental Release of Funds. This process may take up to 60 days to complete, depending on the environmental factors around the home, radon levels in the home, and the designation of the home as historic or non-historic by SHPO.

5. Repair work can begin once the Environmental Release of Funds is complete.
   The entire environmental review process can take multiple months to complete depending on the type and scale of the repair.

6. Approved Environmental Reviews will remain current unless there is a significant change to the property or scope of work. If there is a change, the Construction Team should contact the Environmental Review Project Manager to determine if an updated environmental review will be required.

7. No work or property acquisition can begin until both the Environmental Release of Funds and the notice to proceed have been completed and issued. Work or costs includes soft costs, hard costs, and acquisition, whether this portion of the project is funded with Federal, private, or other funds.

Work Specifications

On all construction projects, a Construction Compliance Monitor must review and approve all work specifications before work may begin.

1. All soft costs must be solicited either by RFQ or a cost reasonableness process (i.e. bidding/quoting).
   - Construction Compliance Monitor must review and approve all bids, regardless of the end use for the construction project, before work may begin.

   - The specifications may be prepared using any industry accepted automated specification writing system in a commonly accepted format, e.g.; room by room, by construction trade, etc.
   - Specifications must be clearly written and prepared with sufficient detail to direct a contractor.
   - Specifications must use commonly accepted dimensions (i.e. square feet, linear feet, each, lump sum, etc.).
   - Specifications must include a construction budget (estimate) on a line-item basis.
   - For projects funded with CDBG dollars, the Construction Compliance Monitor will perform an on-site visit to review and approve specifications/estimates on the basis that the repairs will be brought into compliance with the applicable Indiana Residential Code and Indiana Building Code. Construction Compliance Monitor may take pictures to document repairs.
   - The Construction Compliance Monitor may offer non-binding recommendations on the appearance of existing conditions that are not code-compliance issues.
   - The Construction Compliance Monitor is not responsible for determining which construction method is to be used for a particular activity. To the extent that the specifications call for acceptable construction methods, practices, and residential design, the exact construction solutions are the responsibility of the Contractor. Please refer to the General Requirements in the construction specifications document included in your bid introduction packet.
   - Every attempt will be made to approve the construction budget (estimate) and specifications within five days of a request. A Construction Compliance Monitor will either approve them or request modifications and/or addenda.

  - If modifications and/or addenda are requested, the Construction Compliance Monitor will contact the HRP Manager.
  - Any modifications and/or addenda to the specifications occurring after initial approval must be approved in writing by the Construction Compliance Monitor prior to undertaking the changes.

- Upon approval of the specifications/estimate, the Construction Compliance Monitor will sign and date the RCA form and return it to the Contractor for the organization's records. Specifications will then be considered final and ready for bid solicitation.

2. Other building requirements

- Contractor is required to be in compliance with the applicable Indiana Residential Code, Indiana Building Code, local codes, standards and ordinances, the manufacturers' specifications and industry standards and all contractual obligations including the approved work specifications, plans, drawings, project manuals, construction budget, and workmanship practices.

Inspections

All CDBG funded construction projects shall be inspected by a City Construction Compliance Monitor**.**

The Construction Compliance Monitor will verify that work completed with City funds is in compliance with the applicable Indiana Residential Code, Indiana Building Code, local codes, standards and ordinances, the manufacturers specifications and industry standards and all contractual obligations including the approved work specifications, plans, drawings, project manuals, construction budget, and workmanship practices.

Inspections are required prior to periodic payment requests and/or at the time of completion. City Construction Compliance Monitors must be contacted for these inspections. All work components must be completed and in place for those items for which payment is being requested. At the discretion of the City Construction Compliance Monitor, a percentage of work component costs may be considered. City Construction Compliance Monitor will submit written reports as to any deficiencies discovered upon inspection.

Contractors shall comply with all required City of Indianapolis Department of Code Enforcement permit inspections. The contractor must contact The Inspection Services Section for these inspections. All construction work requiring a permit shall have one.

RECORD RETENTION POLICY

The following documents will be saved for 5 years per CDBG guidelines at the closeout of the project in the HUD system:

- Owner Occupied Repair Lead-Based Paint Tracking Form
- Required attachments referenced in the Owner-Occupied Repair Lead-Based Paint Tracking Form (if applicable)
- Completion of Work Specifications
- SAM.gov searches for contractors and subcontractors
- No Lien Affidavits
- Warranty Form(s)
- Income Qualification Calculator
- Income and Asset Source Documents
- Zero Income Affidavit (if applicable)
- Recorded CDBG Mortgage (must be signed by all household members on the deed per the Assessor's website)
- CDBG Promissory Note (must be signed by all household members on the deed per the Assessor's website)

DMD staff may request additional information from what is listed above.

TERMINATION POLICY AND GRIEVANCE PROCEDURES

Termination Policy

Applicant Intake and Income Qualification: If the HRP team have difficulty in reaching the applicant to complete the Income Qualification application to verify information the applicant will be removed from the program.

Household is determined to be unresponsive, as determined by failure to respond to four attempts by the City to reach the homeowner over a period of four weeks. This includes failure by the homeowner to return or respond to phone calls or emails from City staff or failure to notify City staff of change to contact information. The HRP team will attempt make contact by phone and email over a 4-week period. If no response to phone, voicemail or email is received we will be forced to remove applicants from the program and prioritize those applicants who are responding. Email records will be saved in case an applicant does re-apply.

After Project has been approved: The household's participation in the program may be ended through either voluntary or involuntary termination.

Voluntary termination occurs when the homeowner chooses to leave, or withdraw from, the program for any reason, including: no longer requiring assistance, identifying or enrolling in another program that can complete the repairs, not wanting to take on the lien amount, etc. Households that are voluntarily terminated from the program will not be responsible for repair costs if they withdraw before repair work begins on their home. The City will impose a lien on the property for the cost of the repairs completed to date for households who choose to withdraw mid-repair. Homeowners are encouraged to discuss the estimated cost of repairs with their Housing Navigator prior to work beginning to ensure that they are comfortable with the expected lien amount and understand program requirements.

If the homeowner wishes to end their participation in the program, a written notice must be sent to the City of Indianapolis' Home Repair Team, via email or mail. Homeowners may also withdraw from the program using the web-based application portal or notifying HRP Team via phone.

Involuntary termination is initiated by the City due to a household's non-compliance with program requirements, verbally or physically threatening behavior towards City staff or contractors, or commitment of fraud. Examples include but are not limited to:

- Household no longer occupies the home as their primary residence;
- Household fails to report all sources of household income;
- Household fails to identify all household members;
- Homeowner or household member(s) falsify information to qualify for the program;

- Household member(s) and/or their guests exhibit behavior that is verbally, physically or written threatening, abusive or otherwise inappropriate, towards the Housing Navigator, Construction Compliance Monitor, or any third-party contracted to complete repairs;
- Household fails to provide requested information for application processing or to complete required program documentation; or
- Household is determined to be unresponsive, as determined by:
    - Failure to respond to attempts by the City to reach the homeowner over a period of four weeks. This includes failure by the homeowner to return or respond to phone calls or emails from City staff; or
    - Failure to attend two scheduled meetings for any single stage of the process, where the homeowner did not notify the Homeowner Repair team in advance of their inability to attend; or
    - Failure to allow City staff or contractors access to the home, either by refusing to schedule an appointment or refusing entry at the scheduled time.

The City takes involuntary terminations seriously and seeks to involuntarily terminate households only in the most necessary instances. The City will follow a termination process that includes:

- Providing the household with a written notice containing a clear statement of the reason(s) for termination;
- Providing the household with the opportunity to appeal the decision to staff who were not involved in the initial termination decision;
- Providing prompt written notification of the final decision to the client.

The involuntary termination process will be as follows:

1. The City will issue a written notice via letter or email if provided, to the household containing a clear statement of the reason(s) for termination. The written notice will contain a timeline for responding, copy of the appeals process, and instructions for submitting the appeal to a reviewer who was not involved in the initial decision to terminate the household. The notice will also include the specific date that assistance will terminate if repairs are underway, and the amount of any lien already imposed or planned to be imposed on the property following final decision.
2. The household must submit a written appeal by letter or email to the reviewer within the timeframe described in the letter, which will be no more than 30 days. The household may dispute the circumstances causing the termination or describe any corrective action it will take to address or avoid future incidents. The household will submit the appeal to the individual identified on the written notice. The household may also include within their appeal a request to meet with the appeals reviewer to discuss the proposed termination of assistance.
3. The City will review the appeal and issue a final determination to the household within no more than 30 days of receiving the appeal. The final notice will include the specific date that assistance will be terminated and a notification of the lien placed and its amount, if applicable.

During this process, the City will provide effective communication and accessibility for individuals with disabilities, including the provision of reasonable accommodations. Similarly, the City will provide meaningful access to persons with limited English proficiency.

Grievance Procedures

Households may submit a notice of grievance at any time during the application or renovation phase. A grievance is any complaint arising from an interpretation or perceived violation of HRP Program Policies and Procedures. Households are encouraged to discuss general complaints about the program, process, or repair work with the assigned Housing Navigator either verbally or in writing. All complaints will be documented on a Complaint Log by the HRP Team member taking the call, email, or letter. The Complaint Log will note the name and contact information of the homeowner making the complaint, the City staff member to whom the issue has been referred, and the method by which the complaint was submitted (phone, email, or letter). Every effort will be made to respond to the complaint within five business days via the method used to submit the complaint. Households are also encouraged to submit feedback by completing the post-repair survey or contacting the HRP Navigator or HRP Manager. They may also email complaints and feedback to desmond.conlon@indy.gov (Principal Program Manager – Homeowner Repair Team) and indicate the reason for their email (Complaint/Feedback) in the subject line.

The City requests that homeowners file a grievance immediately if they feel they have witnessed or been the subject of a fair housing violation or housing discrimination and/or suspected criminal activity or fraud. All incidences of suspected criminal activity and fair housing discrimination shall be reported immediately by the Administrator of the Division of Community Investments to the Office of Corporation Council. The City will follow the process as outlined by Corporation Council for those specific complaints.

OTHER REGULATORY REQUIREMENTS

Relocation:

The Department of Metropolitan Development HRP team must comply with the Uniform Relocation Assistance and Real Property Acquisitions Policies Act of 1970, as amended, whenever permanent displacement occurs as a direct result of rehabilitation, demolition or acquisition.

Because the HRP Program is voluntary and homeowners are not required to participate, the City is not obligated to provide relocation assistance to homeowners who may be temporarily relocated due to their repair(s). See: https://www.hud.gov/sites/documents/20653_CH04.PDF

The City may at its discretion consider relocation requests on a case-by-case basis.

When reviewing requests, the City will consider the following:

- Whether the expected work will pose an imminent threat to the health and safety of occupants, and cannot be completed during hours when the homeowner may reasonably vacate the home, or
- If the homeowner has a disability or requires an accommodation that will not be available while work is being completed.

When temporary relocation occurs, as a direct result of rehabilitation, the City will adhere to the following guidelines:

- The City will carefully assess the scope and timeline of repairs and the accommodation needs and will only approve reimbursement for the minimum amount of days required to complete the repair.
- For temporary housing costs, the City will reimburse up to the current daily lodging rate published by the U.S. General Services Administration (GSA) for Indianapolis/Carmel.
- Other ancillary costs such as gas, meals etc. will not be covered.

  The City recognizes that spending funds on temporary relocation costs reduces the number and types of HRP projects that can be addressed. In an effort to be good stewards of these funds, the City will evaluate and approve each relocation request on an individual basis and only to the extent absolutely necessary to complete the repairs safely.

Conflict of Interest:

The City has adopted the following provisions, applicable to any person who is an employee, agent, consultant, officer, board member, elected or appointed representative of the HRP Program.

No person who is in a position within the HRP Program to participate in the decision-making process or gain inside information, can have any financial interest, and shall not acquire any financial interest, direct or indirect, which would conflict in any manner or degree with the performance of services required under their employment. In the performance of their employment, no person having such a financial interest shall be employed or retained by the City of Indianapolis. Any person having such a financial interest shall not personally benefit from the HRP Program.

If it is possible that a conflict of interest will occur, the HRP Team must submit a written request for a waiver of the regulatory requirements to the U.S. Department of Housing and Urban Development (HUD). Additionally, the City must place a public notice in a newspaper of general circulation, disclosing the conflict of interest and requesting public comment prior to the commencement of any activity. This notice must be published for at least 7 days and provide 15 days for public comment. The public notice must be attached to the request for a waiver and submitted to the grant manager. The following template will be used:

"The City would like to assist [beneficiary] at [address] with an essential home repair using CDBG funds. [Beneficiary] is the [conflict of interest relationship] and meets all requirements of the CDBG-funded home repair program. Any comments should be addressed to [organization contact person] at [phone number] or [email]."

The City will submit the waiver request, copy of the public disclosure, and a letter from City of Indianapolis Corporation Counsel stating that this would not violate state and/or local law, to HUD for review. HUD may, on a case-by-case basis, grant an exception to this rule.