Before Starting the CoC Application

In order to be considered for YHSI or YHDP funding, applicants must submit the Youth Homelessness Consolidated Application.

To be considered for YHDP funding, you must also submit the following in order for us to consider your YHDP Consolidated Application complete:

1. the YHDP Priority Listing, and
2. all the project applications for the YHDP funding in your community.

As the Applicant for the Youth Homelessness Consolidated Application, you are responsible for reviewing the following:

1. The FY 2024 & FY 2025 Youth Homelessness Notice of Funding Opportunity (NOFO) for specific application and program requirements.
2. The FY 2024 & FY 2025 Youth Homelessness Application Detailed Instructions which provide additional information and guidance for completing the application.
3. All information provided to ensure it is correct and current.
4. Responses provided by project applicants in their Project Applications, if applying for YHDP funding.
5. The application to ensure all documentation, including attachments, are provided.

Answering Multi-Part Narrative Questions

Many questions require you to address multiple elements in a single text box. Number your responses to correspond with multi-element questions using the same numbers in the question. This will help you organize your responses to ensure they are complete and help us to review and score your responses.

Attachments

Questions requiring attachments to receive points state, “You Must Upload an Attachment to the 4B. Attachments Screen.” Only upload documents responsive to the questions posed–including other material slows down the review process, which ultimately slows down the funding process. Include a cover page with the attachment name.

Attachments must match the questions they are associated with–if we do not award points for evidence you upload and associate with the wrong question, this is not a valid reason for you to appeal HUD’s funding determination.

We must be able to read the date and time on attachments requiring system-generated dates and times, e.g., a screenshot displaying the time and date of the public posting using your desktop calendar; screenshot of a webpage that indicates date and time.

1A. Application Type

1. Community Name	Indianapolis CoC
2. Type of Submission:	YHDP

3. Certify that the applicant will not operate drug injection sites or "safe consumption sites," knowingly distribute drug paraphernalia on or off of property under their control, permit the use or distribution of illicit drugs on property under their control, or conduct any of these activities under the pretext of "harm reduction."	X

This is a required certification to receive funding under the FY2024 and FY2025 Youth Homelessness NOFO (See section III.D and V.A of the NOFO).

General Criteria- Youth Leadership

1a. Describe how the youth with lived experience were involved with the development of this application.

(2,000 characters)

The Indianapolis CoC utilized the expertise of youth and young adults with lived experience to evaluate project applications for funding. The Indianapolis CoC hosted a focus group on July 22, 2026 of youth with lived experience to review the project applications submitted by local, grass roots organizations. The Indianapolis CoC hosted the focus group at a program center for youth and young adults within the Indianapolis CoC, a place where youth and young adults can find a hot meal, shower, laundry, computer lab, and peer support services. The Indianapolis Youth Advisory Board Support Coordinator from the CoC Lead Agency, the Coalition for Homelessness Intervention and Prevention (CHIP), facilitated the meeting. She walked the three persons who joined the focus group through the four project applications and scoring, as well as facilitated the development of a priority listing for those project applications. The Indianapolis CoC NOFO Nonconflicted Workgroup (NCWG) is charged with the evaluation of project applications through the annual CoC competition each year. The NCWG also scored project applications and developed a priority listing. The NCWG utilized the priority listing from the youth and young adult focus group as a basis for their discussion and recommendation to the Indianapolis CoC Board. The Indianapolis CoC Board approved the priority listing based on the work of both groups on August 4, 2026.

1b. Did at least two youth with lived experience meaningfully participate in the development of this application.	Yes

2a. Describe how young people with lived experience will be involved in the project design, implementation, and operation of YHDP projects.

(2,000 characters)

Since its inception in November 2016, the YAB has maintained an open membership process, allowing any YYA who is currently or has previously experienced homelessness to attend. The membership of the YAB is 100% YYA (ages 12 – 24) and 100% are currently or formerly homeless. In the past, the YAB has had membership as high as 13 regular members. The Indianapolis CoC has hired a YAB Support Coordinator through the CoC Planning grant to serve as the primary point of contact for the YAB, offering them support in their work, creating a safe and trauma informed environment to encourage authentic participation and leadership in addressing the housing and supportive services needs of youth and young adults experiencing homelessness. The YAB Support Coordinator has set goals to increase regular attendance at YAB meetings to be at least 7 persons and have 6 meetings for the remainder of 2026. The Indianapolis CoC is the current recipient of YHDP funding, as a program selected in 2019. The YAB originally selected the projects in 2020 under the YHDP designation and per local CoC policies must review and approve any changes to YHDP projects that involve a programmatic change, change of subrecipient or budgetary change of 10% or greater. The Indianapolis CoC will continue this policy with additional YHDP funding. It is the goal of the Indianapolis CoC to include YAB members in every level of the CoC Governance structure, including those workgroups that make strategic goals and funding decisions for the Indianapolis CoC. While the Indianapolis CoC has a Coordinated Plan to End Youth Homelessness, the YAB will be charged with its update, setting new goals and strategies that better meet the needs of youth and young adults today. The YAB will also be responsible for setting continuous quality improvement processes for all YHDP projects in meeting strategic goals. Projects funded with YHDP funding are required to appoint a client of their project to the YAB.

General Criteria- Community Connections

1. How will your community will use funds awarded through this NOFO to address the social and emotional well-being of youth, including incorporating a strengths-based approach, positive youth development, and trauma-informed care.

(1,500 characters)

The Indianapolis CoC original YHDP application intended to measure success of its programs by funding safe housing and connecting YYA to mainstream services which align with outcome measures of the USICH: stable housing, permanent connections, education/employment, and social/emotional well-being. Since the original application in 2019, the Indianapolis CoC has permanently housed 2,319 YYA through Prevention and Diversion projects. Building on the past success of the program, the Indianapolis CoC has developed a Case Manager Institute (CMI) to strengthen the skills and knowledge of case managers serving people experiencing homelessness in Central Indiana. This collaborative initiative brings together United Way of Central Indiana, CHIP, and community partners to build a shared foundation of best practices common values, and effective approaches to case management. The primary tenants of this approach include trauma-informed care, utilizing a strengths-based approach to work through crises, and a focus on positive youth development. Of the 26 attendees in the first cohort, 15 came from organizations serving YYA. The next cohort will begin in fall 2026. It is through this approach the Indianapolis CoC will build upon past success.

2. Describe one strategy that emphasizes the development of self-sufficiency, personal responsibility, resilience-building, and character development while acknowledging the impact of difficult life experiences on youth development.
(1,500 characters)

The Indy CoC strategy will be to expand current interventions, including utilizing upstream diversion as a method to address and prevent YYA homelessness and system navigation, with wrap-around services, to help quickly house YYA. These are two of the top performing programs within the Indianapolis CoC portfolio. Diversion has been an intervention that has seen success in the community to prevent YYA from entering the system. In 2025, the Outreach Diversion program exited and permanently housed 72% of its clients. The program had zero (0) clients enter homelessness within 30 days of entering the program, and 7% of clients entered homelessness within 180 days of enrollment. That same year, the Outreach System Navigation program exited and permanently housed 88% of its participants. Both interventions focus on wrap around services and supports for YYA. One strength of the services provided in these programs is the SODAS problem solving method. SODAS stands for “situations, options, disadvantages, advantages, and solutions,” whereas the case manager works with YYA to identify the problem, brainstorm one or two options, review the disadvantages and advantages of each, and select a solution. SODAS teaches youth to engage their rational-thinking brain to promote healthy thinking, resilience-building and character development. The goal of the SODAS program is to promote self-ownership and build independence and personal accountability.

3. Describe at least two strategies your community will implement to promote economic independence and prevent long-term dependency on social services.

(1,500 characters)

The Indianapolis CoC will follow two strategies to prevent long-term dependency on social services by 1) promoting education and employment programs and 2) increasing financial literacy for youth and young adults. By promoting education and employment, YYA can increase their income to a level where benefits are no longer necessary to independent living. Since 2019, the Indianapolis CoC has met the following achievements for education and employment: 1) 15% of System Navigation YYA had income at program exit and 2) 31% of all YYA system wide who exited to PH had income at exit. Expanding on successful connections with adult education and work programs has been the backbone of this success and will continue through expanded projects. One of the largest gaps for YYA experiencing homelessness is financial literacy. The cycles of poverty and homelessness have resulted in a loss of understanding budgets, banking, and credit. The National Alliance to End Homelessness supports the addition of assistance for asset building, such as Individual Development Accounts and opening bank accounts with clients to implement these new skills. The CoC will expand financial literacy and learning to include real-world practices through partnerships with local banking institutions, credit unions, and financial advisor services to mentor youth. The Indianapolis CoC is setting the goal that 80% of YYA served have a bank account or primary financial account to build independence.

4a. How will you build connections between at-risk youth and school, life skills training, and job attainment skills?

(1,500 characters)

The Indy CoC will build on current connections with schools and education programs to increase access to training and job readiness skills. For YYA in school, there are McKinney Vento liaisons within the nine school districts of Marion County. The CoC has contracts with the Indianapolis Public Schools and the schools of Lawrence, Washington, Pike and Warren Townships, connecting YYA within the homelessness system to education. Since the YHDP implementation, the Indianapolis CoC has found youth to present their housing instability to their teachers and coaches. Partnerships between the Indianapolis CoC and the local schools are essential to improve housing stability and educational attainment for at-risk students. The goal of the CoC is to establish contractual relationships with each of the remaining township school districts. The CoC will build upon current partnerships with post-secondary education and employment programs that target YYA. Ivy Tech Community College has a McKinney Vento Liaison, offering supports to YYA getting a post-secondary education. Other programs, like the YES Program, focus on providing YYA employment skills and the soft skills needed to keep employment. YHDP programs also partner with Jesus had a Trade program, helping YYA with licensure, walking them from training to license to job placement, in jobs such as plumbing, general contracting and HVAC. Each of these partnerships are intended to help YYA with the skill building and employment placement.

4b. How will you build connections between at-risk youth and employment opportunities?

(1,500 characters)

The Indianapolis CoC partners with two major employment and job placement programs. The first example is the YES Program, which is for anyone ages 16-24 living in Indianapolis who is not enrolled in school, is not currently working or is seeking better opportunities. The YES Program is part of a larger EmployIndy Organization, with an employer hub that can connect a trained workforce with employment opportunities. After completing the YES Program training, YYA are connected to employers looking for talented workers and job opportunities. The YES Program will provide supports for new workers, such as tools and equipment for various trade jobs, transportation vouchers for the local public transit, and referrals to quality, affordable childcare for parenting youth. Keys2Work, Inc. is an employment program for justice involved citizens, trying to successfully transition into the workforce. Keys2Work has 20 years of staffing experience, helping workers find and transition from Any Job, to a Better Job, to a Career (ABC). Keys2Work not only works to place people in jobs, but also helps them stay in jobs long enough to establish a career and an income that is self-supporting. The Indy CoC will build on these relationships, asking YHDP projects to utilize these specific services for YYA. The CoC will see additional funding avenues to provide more resources to expand the programs for the additional YYA served through new YHDP programs and improve education/employment outcomes.

General Criteria- Building Safe Communities

1. Demonstrate, by providing evidence, that the project applicant cooperates and does not interfere with or impede local efforts to advance the objectives below, and assists first responders in providing services to homeless youth.

(1,500 characters)

If the City of Indianapolis' Office of Public Health and Safety (OPHS) determines a camp presents a public health or safety concern, either to its residents or to the surrounding community, it may take action to close the camp. Camp closures are guided by local ordinances and public health assessments. In February 2021, the City-County Council directed OPHS to identify and assess encampments to determine whether they should be closed or cleaned based on public health and safety concerns. This directive formalized OPHS's role in coordinating camp management and response. So far in 2026, it has issued 18 camp closure notices. Additionally, IMPD is required to comply with laws governing encampments. Indiana Senate Bill 285, which went into effect on July 1, 2026, prohibits an individual from camping, sleeping, or using for long term shelter land owned by the state or a political subdivision, unless the land has been authorized for that use. It requires a law enforcement officer who discovers a person unlawfully using land owned by the state or a political subdivision for unlawful camping, sleeping, or long-term shelter to determine if there are reasonable grounds for emergency detention of the person, and, if reasonable grounds exist, to proceed under the emergency detention procedure and not the criminal law. The directive for OPHS to evaluate and close encampments was already in effect prior to the state bill passage.

2. Identify local laws, policies, or other practices that help or hinder the project applicant's ability to advance the objectives below and provide a plan explaining how the project applicant will leverage beneficial policies while overcoming the harmful effects of restrictive ones. If you cannot provide any mitigating steps, please explain why. Include qualitative and quantitative details in your response.

2a. Quickly clears tents and encampments on public property and connects youth who are camping in public with appropriate services. In your response, describe the current status of tents and encampments in the geographic area.

(1,500 characters)

The Indianapolis Metropolitan Police Department (IMPD) and Indianapolis Office of Public Health and Safety (OPHS) work together with the CoC to clear encampments on public property and connect individuals who are camping in public with services. The CoC launched the Streets to Home Indy program in early 2026, a citywide public/private initiative to end chronic and unsheltered homelessness. Phase I focuses on moving people off from the streets into housing and permanently closing encampments. Through targeted and coordinated outreach, housing navigation, unit acquisition, and case management, individuals are engaged in a 4-to-6-week process to move directly from the streets into housing with the services. Once individuals are housed from a site, that area gets cleaned, cleared, restored to its original use. The Indianapolis Department of Public Works, OPHS, and IMPD's Homeless Unit all contribute to this effort with public resources. In the past 12 months, the program has housed more than 205 people averaging just 26 days from streets to home, closed 7 encampments and 3 downtown zones, and achieved a 95% housing retention rate. Out of the encampments closed, 1% of the enrollees were YYA. This somewhat aligns with the Indy Point in Time Count data, where in 2026, 136 YYA were counted and only 20 were unsheltered (15%). The CoC has found YYA have are very transient but have systems in place to help those who are living in encampments.

2b. Decrease the public use of illicit drugs and quickly connect homeless youth who are using illicit drugs in public with appropriate services and/or law enforcement. In your responses, describe the current status of overdoses and illicit drug use in public spaces in the geographic area.

(1,500 characters)

Marion County continues to face significant challenges related to illicit drug use and overdose, particularly among individuals experiencing homelessness. In 2024, UCLA researchers identified Marion County as a "hotspot" for adolescent fatal overdoses, having at least 20 overdose deaths and death rates higher than the national average. In 2024, according to Indiana overdose records, Marion County accounted for 40.6% of overdose deaths in the 15-24 age group. Local policies and practices support coordinated behavioral health response through multidisciplinary street outreach, diversion strategies, and partnerships among public health, behavioral health providers, housing agencies, and law enforcement. However, fragmented eligibility criteria, limited population-specific treatment and shelter capacity, privacy requirements that complicate care coordination, and insufficient affordable housing limit timely connections to care. The community leverages existing cross-system partnerships to rapidly identify homeless individuals using illicit drugs in public, provide immediate outreach and warm handoffs to treatment and housing resources, and coordinate with law enforcement when public safety requires intervention. Success will be measured through reduced public drug-use encounters, increased treatment engagement and available treatment options, improved housing placements, and fewer repeat emergency or law enforcement contacts.

2c. Utilize standards that address homeless youth who are a danger to themselves or others (e.g., involuntary commitment).

(1,500 characters)

Indianapolis is home to Adult and Child Health (A&C), a local nonprofit health provider that provides a variety of programming, including mental health services. A&C is the primary partner of the Indianapolis CoC when it comes to the provision of mental health services because services are provided regardless of the person's ability to pay. In 2026, A&C merged with Centerstone, a nationally recognized provider of mental health and substance abuse services for persons of all ages, including YYA experiencing homelessness. Centerstone has a Youth Community Based team for Indianapolis composed of six (6) individuals. The Referral Coordinator, who leads the team, will accept referrals from local YHDP providers in the community and a Clinical Evaluator will complete a clinical evaluation. In the circumstance where inpatient care is needed, Centerstone has behavior hospital care available for persons who may be a danger to themselves or others. The clinical or psychiatric evaluation will identify the immediate danger as well as other medical and mental health issues that may influence the care needed. The recent merger brings additional resources to the community for YYA facing multiple diagnoses, some of which may need a safe space in a clinical situation for treatment. If the Indianapolis Metropolitan Police Department encounters homeless youth who meet the 3 prongs for emergency detention (danger to self, danger to others, and gravely disabled), they will place the youth under de

2d. Comprehensively share information, including location information, in accordance with the Sex Offender Registry and Notification Act (SORNA).

(1,500 characters)

Indiana is not a state that has substantially implemented SORNA as designated by the DOJ. However, effective January 1, 2003, Zachary's Law required sheriff's departments to jointly establish the Indiana Sex and Violent Offender Registry to provide detailed information about individuals who register as sex or violent offenders in Indiana. The purpose of the registry is to inform the general public about the identity, location, and appearance of sex and violent offenders who live, work, or study in Indiana. On July 1, 2006, the Indiana Department of Correction replaced the Indiana Criminal Justice Institute as the agency that oversees the State's Sex and Violent Offender Registration and Registry efforts. As a part of this new responsibility, the Department provides judges, law enforcement officials, prosecuting attorneys, parole officers, probation officers, and community corrections officials with information and training concerning the requirements of Indiana Code 11-8-8 and the use of the Indiana Sex and Violent Offender Registry. The Marion County Sheriff's Office has a Sex & Violent Offender Registry Unit that takes the lead on reporting and compliance.

The project applicant should maintain records reflecting the analysis performed in response to these rating criteria.

YHDP Criteria- Community Coordination

1. Describe how the YHDP community applicant or partner organizations work with Public Housing Agencies (PHAs) or other affordable housing providers in the community.

(1,500 characters)

The Youth and Young Adult system has several pathways for direct connection with the Indianapolis Housing Agency, the public housing agency. The first pathway provided is for youth (18-24 years of age) who qualify for a Foster Youth to Independence (FYI) voucher. The CES collaborates with the State of Indiana Department of Child Services and local agency Firefly, to confirm 3rd party eligibility which then provides a pathway to permanent housing using the voucher when the housing agency has vouchers available. The opening is matched using the CES prioritization in a youth and young adult specific case conferencing meeting. Youth and Young Adult providers are also identified (if needed) in the case conferencing to provide support navigating the steps to moving in with the voucher. The second option, is a direct pathway for youth and young adults referred to the local housing agency through the Department of Child Services. Firefly, a local agency working with at risk and homeless youth provide the housing navigation and supportive services for eligible households. Firefly also collaborates with the CES to ensure that households are not duplicated in either pathway to maximize the benefit of the permanent housing pathway for both groups of youth and young adults.

2. Describe how the YHDP community applicant or partner organizations will work with long-term residential care facilities or permanent supportive housing providers to ensure assistance for youth experiencing homelessness with a disability that is expected to indefinitely prevent independent living or self-sufficiency.

(1,500 characters)

The Indianapolis CoC has three different projects with permanent supportive housing units available and reserved for YYA: 1) St Lucas Lofts, 10 units; 2) Pando, 36 beds/units; and 3) Glenmoor, 22 beds/units. Each of these projects has arisen for the demand for permanent housing options for youth as well as the community commitment to its previous YHDP designation. With YHDP supportive service programs well-resourced, the Indianapolis CoC has been able to prepare YYA for permanent housing in an efficient manner. In 2025, the housing readiness resulted in an 86% permanent housing exit for YYA coming into the Indianapolis homelessness system. The City of Indianapolis, through its Department of Metropolitan Development (DMD), conducts outreach with developers across the community, forging partnerships with the Corporation for Supportive Housing (CSH) Institute and state housing finance agency, creating a pipeline of PSH and other permanent housing options. The CSH Supportive Housing Institute brings teams from various sectors together for intensive and interactive workshops covering all aspects of creating affordable and supportive housing, from initial concept to operations. Teams graduate from the Institute with a housing development plan and a path for acquiring funding. DMD, in turn, sets aside funding for partnerships willing and able to complete the intensive training. DMD continues its outreach to local developers willing to work with YYA.

3. Describe how the YHDP community applicant or partner organizations work with education providers in the community.

(1,500 characters)

The Indy CoC has a strong partnership with local education providers, via the McKinney Vento Liaisons. For YYA in school, there are McKinney Vento liaisons within the nine school districts of Marion County. Each CoC funded project, along with ESG funded projects, are required to have a person who will work directly with each of the McKinney Vento liaisons. Going further, the CoC has contracts with the Indianapolis Public Schools and the schools of Lawrence, Washington, Pike and Warren Townships, connecting YYA within the homelessness system to education. Since the YHDP implementation, the Indianapolis CoC has found youth to present their housing instability to their teachers and coaches mor often than other places. The goal of the CoC is to establish contractual relationships with each of the remaining township school districts to improve access for all YYA experiencing housing instability. The CoC also has partnerships with post-secondary education programs that target YYA. Ivy Tech Community College has a McKinney Vento Liaison, offering support to YYA getting a post-secondary education. Other programs, like Brightlane Learning, offer academic supports at local shelters and housing providers as well as within schools with high incidences of housing insecurity. Through 30+ partnerships and locations, Brightlane serves 750+ students each year through this program.

4. Describe what strategies your community implements to identify and assist youth experiencing or at risk of experiencing any form of trafficking, sexual exploitation or similar traumatic experiences.

(1,500 characters)

YouthLink, the CoC System Navigation Program, collaborates and shares information with Outreach Inc.'s Program Center team, which has their own separate intake for youth. The additional intake identifies YYA who may be experiencing or at risk of any form of trafficking, sexual exploitation or similar experiences via direct questions. It also assesses if YYA are already receiving services for their specific circumstances or if they need to be connected by Youthlink staff to services. If services are needed, Youthlink staff connect YYA with local services providers with expertise in the protection protocols for victims of violence and exploitation. The Indiana Youth Services Association (IYSA) works within the community to train providers to provide trauma-informed, victim-centered training on identification and collaborative support of youth victims and survivors of labor and sex trafficking. IYSA is also working to identify more resources through advocacy and education to help YYA who are at-risk or victims of trafficking. Although it is a new program partner in the community, since January 2025, the organization has helped community partners serve over 1200 trafficked youth in addition to many more sexually exploited and high-risk youth. The Indianapolis CoC is looking for new and emerging partners to help with this difficult to serve population.

5. Describe what resources in your community, either currently operating or being planned under this or the CoC NOFO, are available to assist youth with substance use disorders.

(1,500 characters)

The Indianapolis CoC has prioritized a SSO project in its CoC competition priority listing that will provide substance use treatment and recovery services for homeless neighbors. The provider, the Damien Center, is a current YHDP provider and will be the provider of this Substance Use Disorder (SUD) project. The purpose is to provide substance use disorder treatment and wrap-around supportive services to support people's efforts to recover and regain self-sufficiency. The SUD Treatment project directly aligns with a core strategy of the Indianapolis CoC Comprehensive Plan to End Homelessness: expanding access to integrated behavioral health services that address the co-occurring conditions contributing to homelessness, including substance use disorders, mental health needs, and chronic health conditions. This will be accomplished with a team consisting of two Peer Recovery Coaches and two Licensed Mental Health Therapists that will implement an Intensive Outpatient Program (IOP). IOPs for substance use disorders offer services to clients seeking primary treatment; step-down care from inpatient, residential, and withdrawal management settings; or step-up treatment from individual or group outpatient treatment. IOP treatment includes a prearranged schedule of core services (e.g., individual counseling, group therapy, family psychoeducation, and case management for a minimum of 9 hours per week for adults or 6 hours per week for adolescents).

6a. Describe how your community provides services and connects youth to resources for substance use including crisis response services.

(1,500 characters)

Outreach, Inc, the local YHDP System Navigation provider, found through data collection that substance abuse services among local YYA is low compared to the general population experiencing homelessness. The organization conducts a bi-annual survey of YYA and out of a sample size of 134, 28% of YYA disclosed using substances to cope with stress and/or mental health symptoms, with only 2% using a substance other than alcohol or marijuana. Currently, the Indianapolis CoC has relied on agency-to-agency connections. With expanded outreach and a new project within the annual summer CoC competition, YYA experiencing a substance use disorder will have greater access to services. System Navigation will have the capacity to provide more one-on-one case management and communication with clients. Regular contact and communication in the case manager/YYA relations is very important to help with connections, guiding YYA through services and opportunities for them. Additionally, the Damien Center will have a substance use disorder supportive service project that will expand the community's capacity for this type of service. This is important as the Damien Center is a current YYA provider and has expertise in both serving YYA and providing substance use disorder services via its health center. This new project is a way to meet a need in the community through new funding resources.

6b. Describe how your community provides services and connects youth to appropriate resources for mental health conditions, including crisis response services and mental health providers with expertise in treating youth.

(1,500 characters)

The Indianapolis CoC funds the Outreach System Navigation project, or YouthLink, as the front door to directly connect YYA households to services, including substance use and mental health providers. The CoC has built relationships with local treatment providers that house inpatient and outpatient services, aligning with the needs of the household. While the partners do not control or facilitate the deployment of substance use treatment, they provide a critical connection and re-connection to local programs. When a YYA and/or case manager identifies a substance use need, YouthLink will make warm referrals to community-based treatment and recovery partners based on the YYA's needs and choices. Additionally, Youthlink also uses similar partnerships to connect with local mental health providers. A sample partnership is the Fountain Square Counseling, a one site connection to professionals that can facilitate additional therapeutic appointments and diagnosis that can open eligible permanent housing pathways. The CoC has, beyond its YYA area of services and housing, additional partnerships with an Assertive Community Treatment (ACT) Team housed through Cornerstone and Adult and Child (a FQHC) offer mental health services.

7a. Describe a plan to promote participation in supportive services within YHDP housing projects.

(1,500 characters)

The Indianapolis CoC has evaluated its CoC portfolio and the services attached to each housing project. To improve the outcomes of projects, CoC providers realized that YYA and other clients need to understand the full array of services available to them once entering the program as well as understand the requirements for graduating or moving on from the housing program/exiting to unsubsidized housing. In response, the local Provider Workgroup formed a subgroup to develop an occupancy agreement that outlines the responsibilities of the provider as well as the client, including participation in supportive services. The agreement outlines the process for evaluation of the needs with the case manager and the client, followed by the offering of supportive services available to meet those needs. Failure, on part of the client, to participate in supportive services may result in dismissal from the housing program. The agreement also includes the clause that “assistance may not be denied on the basis or as a direct result of the fact that you, as the participant, are or have been a victim of domestic violence, dating violence, sexual assault, or stalking, if you otherwise qualify for admission, assistance, participation, or occupancy.” The City of Indianapolis, as the UFA, will require each YHDP funded project to include this agreement as part of each funded unit and will monitor projects for compliance. Projects not utilizing the occupancy agreement may be at risk for funding.

7b. Will all transitional housing projects (excluding residential housing) included in the priority listing have a supportive services participation agreement with residents?	Yes
7c. Is at least one project included in the priority listing designed to provide substance abuse treatment and require participation in substance abuse treatment services as a condition of continued participation in the program?	No
8. Are at least 20% of the total YHDP funds requested on the priority listing, excluding funds from planning and HMIS grants, allocated to supportive services costs.	Yes

9a. Describe how projects included on the YHDP priority listing serves specific youth subpopulations (i.e., pregnant or parenting youth, domestic violence survivors, youth with substance use disorder.)

(1,500 characters)

Since the implementation of the first YHDP designation, the Indianapolis CoC has revamped its Coordinated Entry (CES) assessment to a vulnerability assessment and prioritization. This new assessment/prioritization replaces the former VI-SPDAT had a disproportionate impact on some individuals and families. The new assessment does not separate YYA from the general population; however, there is a separate case conferencing for YYA that enables the CoC providers who serve and/or house YYA to quickly serve vulnerable YYA subpopulations. YYA are prioritized by chronicity, length of time homeless and vulnerability. Case Conferencing considers additional factors for YYA, such as foster care experience, age, student status and pregnant/parenting YYA, and allows for referral to specific programs that target those subpopulations. While none of the projects within the priority listing will target one of the subpopulations listed, each of the projects will offer services and/or transitional housing to any YYA seeking housing or service assistance.

9b. Do at least three projects provide a preference for housing or services to subpopulations who need the specialized supportive services that are provided in the housing (e.g., substance abuse treatment, domestic violence services)	No

10a. Describe your community's system for identifying eligible youth participants and referring them to the appropriate services.

(1,500 characters)

Skilled Assessors connect with youth and young adults throughout the Indianapolis Continuum of Care as a critical partner identifying the needs of youth and young adults. A system facing team called YouthLink connects with households to identify the immediate housing crisis needs of a household. The team consisting of 3-4 Street Outreach providers from 2 youth and young adult serving agencies collaborate as the front door for young adults evaluating the benefits of but not limited to, Housing Problem Solving, Diversion, safe stable rehousing, eligibility for continuum housing resources, emergency shelter, substance abuse treatment or basic needs (if experiencing unsheltered homelessness). Community partners also provide referral opportunities through YouthLink for transitional housing, Host Homes and resources specific to the engagement in the justice system and warrant resolution.

10b. Discuss how screening and assessment tools identify the following special populations:

Special Population	
Pregnant and Parenting Youth	The Indianapolis CES has a data collection workflow that identifies YYA and pregnant/parenting through a series of questions. Youthlink, the CoC System Navigation Program, administers an additional youth survey and program evaluation for YYA. The survey gathers qualitative data regarding each of these special populations.
System-involved youth (including juvenile justice and child welfare)	The Indianapolis CES has a data collection workflow that has questions asking if the client has been involved with foster care or justice system. Youthlink, the CoC System Navigation Program, administers an additional youth survey and program evaluation for YYA. The survey gathers qualitative data regarding each of these special populations.

Exploited or trafficked youth	Youthlink, the CoC System Navigation Program, administers an additional youth survey and program evaluation for YYA. The survey gathers qualitative data regarding each of these special populations.
Youth in need of substance abuse or mental health services	Youthlink, the CoC System Navigation Program, administers an additional youth survey and program evaluation for YYA. The survey gathers qualitative data regarding each of these special populations.

11. Describe at least one strategy the community uses to encourage reunification whenever it is safe and possible, including family counseling and mediation services.

(1,500 characters)

The Indianapolis CoC and YHDP providers recognize that YYA benefit from connecting and strengthening their natural support systems, which can include immediate family, extended family, or other safe and supportive adults in their community. When working with YYA, Indianapolis CoC programs assess the safety and health of those potential supports. Where appropriate, programs provide encouragement, creative housing problem solving, and conflict mediation and resolution to strengthen healthy, supportive community that youth can engage in the long term. This may result in permanent housing placements with friends or family, and even when it does not, strong natural supports are an important element to housing retention in the long term when housed independently. With limited permanent housing options for YYA, the Indianapolis CoC prioritizes safe family reunification when it is available to improve the success of YYA, exiting them to permanent housing and preventing them from returning to homelessness. Local YYA service providers offer continued service support to ensure the successful reunification.

12. Describe how projects included on the YHDP priority listing were selected for this application.

(1,500 characters)

The Indianapolis CoC utilized the expertise of youth and young adults with lived experience to evaluate project applications for funding. The Indianapolis CoC hosted a focus group on July 22, 2026, of youth with lived experience to review the project applications submitted by local, grass roots organizations. The Indianapolis Youth Advisory Board Support Coordinator facilitated the meeting with peers from the CoC Lead Agency, the Coalition for Homelessness Intervention and Prevention (CHIP). She walked the three persons who joined the focus group through the four project applications and scoring, as well as facilitated the development of a priority listing for those project applications. The Indianapolis CoC NOFO Nonconflicted Workgroup (NCWG) is charged with the evaluation of project applications through the annual CoC competition each year. The NCWG also scored YHDP project applications and developed a priority listing based on score. The NCWG utilized the priority listing from the youth and young adult focus group as a basis for their work and recommendation to the Indianapolis CoC Board. The Indianapolis CoC Board approved the priority listing based on the work of both groups on August 4, 2026.

YHDP Criteria- System Planning & Data

1. Is the application from an eligible previously awarded YHDP community?

Yes

1. Describe what strategies and data sources your community uses to measure self-sufficiency and stability outcomes

Long-term stability/no recidivism and safe and stable housing; (may include longer-term residential treatment centers or facilities)	The Indianapolis CoC utilizes a scoring tool for all renewal projects. Within the tool, the CoC measures return to homelessness at the 12-month mark. Projects with lower percentages of returns to homelessness within 12 months of exiting a program score higher on the renewal scoring tool and projects with higher scores are prioritized for renewal in the annual priority listing. The Indianapolis CoC will set the following goals: 1) lower the recidivism rate to 5%, 2) divert 45% of YYA from the homelessness system, 3) increase positive exits to 90%.
Education, employment, and income and career growth;	The Indianapolis CoC utilizes a scoring tool for all renewal projects. Within the tool, the CoC measures increase in income and enrollment in an education program. Projects with rates of YYA with increased income and YYA enrolled in education programs score higher on the renewal scoring tool and projects with higher scores are prioritized for renewal in the annual priority listing. The CoC will set the following goals: 1) 25% of YYA will increase their education level. 2) 75% of YYA will increase their income.
Permanent social connections; and	The Indianapolis CoC will set the following goals: 1) 20% of YYA identify reunification goals and achieve them. 2) 20% of YYA will report a permanent connection to at least one adult for a safe, stable relationship. 3) 85% of YYA that are diverted or identified as unsheltered/sheltered are linked to positive support systems. The HMIS team will measure the progress of projects year/over year towards these goals.
Social and emotional well-being.	The YAB and CoC will develop and utilize a pre- and post-survey to measure the following social and well-being goals. 1) Decrease number of YYA engaging in risky behaviors such as addiction or criminal activities each year by 40%. 2) Of those engaged in services, 90% of YYA report improved outcomes on key social and emotional well-being indicators as identified by the YAB. 3) 35% of YAB will increase leadership skills through increased participation in the YAB and CoC.

2. Based on the most recent year of operation, what percentage of clients that exited YHDP projects:

Had a positive exit destination	86%
Increased income	48%
Had a positive school status	11%

3a. How will the community build on the progress that was made to the youth homeless response system through the original YHDP?

(1,000 Characters)

The 2019 YHDP application included a youth specific count, but the Indianapolis CoC has learned since that time that YYA do not live in areas unfit for human habitation or present to local agencies as previously thought. Out of the encampments closed, 1% of the enrollees were YYA. This somewhat aligns with the Indy Point in Time Count data, where in 2026, 136 YYA were counted and only 20 were unsheltered (15%). Most YYA come to the homelessness system through the local drop-in centers and via word-of-mouth from non-housing/service providers. The CoC has learned the number of YYA experiencing homelessness is much greater than the original system models showed from 2019. The CoC has selected to expand the highest performing projects. Both system navigation and diversion projects will expand to add 11 new staff, including housing navigators, employment specialists, relationship coaches and a triage specialist. The additions to the team will benefit the program in multiple ways, by increas

3b. What interventions are still needed and how will they be connected to the original YHDP projects?

(1,000 Characters)

One of the housing options the CoC had considered in the previous YHDP application was shared housing. Shared housing is an affordable housing strategy where two or more unrelated individuals share a lease, rent, utilities, and common spaces in a permanent housing unit. For youth and young adults (YYA) experiencing or at risk of homelessness, this model offers enhanced affordability, reduced social isolation, and customized peer matching. This idea was investigated through the previous YHDP planning grant but for a variety of reasons was never implemented. The CoC would like to investigate this as a possible option to help YYA succeed in affording local housing as Indianapolis can be a higher cost housing market. The second effort the CoC will make is to develop a pipeline of permanent housing options targeted for YYA. The City, via DMD, does offer some match making for developers interested in creating more PSH units, formulating teams and making sure grant resources are prioritized

YHDP Criteria- Rural

Does the geographic area covered by the application meet the rural definition found in Appendix I Of the Youth Homelessness NOFO?	No

Policy Initiative Preference Points

2. Is the geographic area of the YHDP within an Opportunity Zone? Yes

2a. On the attachments screen, upload a form HUD-2996, Certification for Opportunity Zone Preference Points on the Attachments screen.

3. Provide the policy or statement the community applicant has in place to ensure that all housing projects submitted by the YHDP Community Applicant will not operate drug injection sites or "safe consumption sites," knowingly distribute drug paraphernalia on or off of property under their control, knowingly permit the use or distribution of illicit drugs on property under their control, or conduct, permit, encourage, or allow any of these activities under the pretext of "harm reduction".
(Maximum 2000 characters)

The Indianapolis CoC, with the help of its network of housing and service providers, developed a drug prohibition policy. The policy, attached to this application, includes the standards set by the Indianapolis CoC and methods for remediation if any project is found in violation. The policy reads: The Indianapolis CoC affirms its commitment to operating all CoC-funded housing programs in compliance with federal law, including but not limited to 2 CFR 200.300(a), 21 U.S.C. §§ 856 and 863, and 24 CFR 578. All project applicants must certify that: 1) They will not engage in illegal racial discrimination. 2) They will not operate drug injection sites or “safe consumption sites” in violation of federal law (21 U.S.C. 856(a)(1)). 3) They will not knowingly permit the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2). 4) They will not knowingly distribute drug paraphernalia in violation of 21 U.S.C. 863. The CoC further affirms that these prohibitions do not require: 1) Program participants to be sober to receive assistance; 2) Participation in substance use treatment as a condition of assistance; or 3) Eviction or program exit for a first-time violation of a drug-related policy or lease provision. The CoC will take appropriate and proportionate action if a funded project is found to be in violation of this policy. Potential remedies include: 1) Corrective Action Plans (CAPs): Required remediation steps with defined timelines; 2) Increased Monitoring: Enhanced program oversight, including site visits and documentation review; 3) Technical Assistance: Targeted support to achieve compliance; 4) Conditional Funding Status: Restrictions placed on current or future funding eligibility; and/or 5) Reallocation or Non-Renewal: Removal or redistribution of CoC funds for continued or serious violations. All enforcement actions will follow established CoC governance and monitoring procedures and ensure due process.

Attachments

Document Type	Required?	Document Description	Date Attached
1) Subrecipient Nonprofit Documentation	No		
2) Application for Federal Assistance (SF-424)	No		
3) HUD Applicant Recipient Disclosure Report (HUD-2880)	No		
4) Applicant and Recipient Assurances and Certifications (HUD-424B)	No		
5) Disclosure of Lobbying Activies (SF-LLL)	No		
6) Lobbying Form	No		
7) Drug-Free Workplace (HUD 500-70)	No		
8) Tribal Consent	No		
9) Other	No	Attachment I - Op...	08/06/2026

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description:

Attachment Details

Document Description: Attachment I - Opportunity Zone and Drug Free Zone

Submission Summary

Ensure that the Project Priority List is complete prior to submitting.

Page	Last Updated
1A. Application Type	08/06/2026
General- Community Connections	08/06/2026
General- Safe Communities	08/06/2026
YHDP- Community Coordination	08/06/2026
YHDP- System Planning & Data	08/06/2026
YHDP- Rural	08/06/2026
Policy Initiative Preference Points	08/06/2026
Attachments	08/06/2026
Submission Summary	No Input Required

Attachment I

Certification for Opportunity Zone Preference Points (HUD – 2996)

NOFO Drug Prohibition Policy

Certification for Opportunity Zones Preference Points

U.S. Department of Housing and Urban Development

OMB Number: 2501-0044
Expiration Date: 02/28/2027

Type or clearly print the following information.
***Warning: Anyone who knowingly submits a false claim or makes a false statement is subject to criminal and/or civil penalties, including confinement for up to 5 years, fines, and civil and administrative penalties (18 U.S.C §§ 287, 1001, 1010, 1012, 1014; 31 U.S.C. § 3729, 3802; 24 CFR § 28.10(b)(1)(iii)).*

Applicant Organization: City of Indianapolis

Assistance Listing number and Federal Program name to which the Applicant is applying:
Include the funding opportunity number and name exactly as it appears in the applicable funding opportunity announcement (example: 14.896, Family Self-Sufficiency Program).

14.276 -- Youth Homelessness Demonstration Program

Opportunity Zone Census Tract(s), which the proposed activities/projects will benefit:
Include below the full 11-digit census tract number (example: 06067001101). Designated Opportunity Zone Census Tracts can be found at: https://opportunityzones.hud.gov/resources. Select the "CDFI Fund Opportunity Zones Resources" link and then select the "List of designated Qualified Opportunity Zones."

18097354400; 18097355000; 18097390800; 18097342101; 18097340102;18097342400; 18097380200; 18097380300;
18097340108; 18097310306; 18097340400; 18097390700; 18097341600; 18097356400; 18097353600; 18097351200;
18097353500; 18097391000; 18097353500; 18097353300; 18097351700; 18097390900; 18097354200; 18097352800;
18097352700; 18097354400; 18097354500; 18097356200; 18097355700; 18097352600; 18097354900; 18097355000;
18097355600; 18097361200; 18097361300; 18097322000; 18097322600; 18097330805; 18097390600

The application meets which of the following criteria (please select one):

- ☐ The proposed activities/projects will occur solely within the Opportunity Zone Census Tract(s) listed above.
- ☒ The proposed activities/projects will occur within the Opportunity Zone Census Tract(s) listed above and other communities.
- ☐ The proposed activities/projects will occur outside Opportunity Zone Census Tracts, but substantial and direct benefits will accrue within the Opportunity Zone Census Tracts listed above.

Note: Projects which substantially and directly benefit Opportunity Zone Census Tracts, but which do not consist of activities delivered within Opportunity Zone Census Tracts may be considered for competitive preference. If applicable, the respective Federal Agency will clearly define "substantially and directly" in the relevant funding announcement.

Estimated Funding Allocations

Estimate a percentage of the total dollar amount of awarded federal funding that would result in a direct benefit within the Opportunity Zone Census Tracts listed above:

- ☐ 76% - 100%
- ☒ 51% - 75%
- ☐ 26% - 50%
- ☐ 11% - 25%
- ☐ 1% - 10%

Provide a narrative explaining and/or reference the section in the application that explains how the project will support public and private investment in urban and economically distressed areas, specifically qualified Opportunity Zones (300-word limit):

Example: "The Main Street project described in this application will stimulate economic opportunity and mobility, encourage entrepreneurship, expand quality educational opportunities, and promote workforce development for those families residing within the XYZ Opportunity Zone."

The YHDP application and projects included within will stimulate economic opportunity by providing transitional housing and services to youth to prevent homelessness and increase economic self-sufficiency.

Check the following boxes that accurately reflect the nature or purpose of the proposed project:

- ☐ Access to Capital
- ☐ Asset Building
- ☐ Business Assistance
- ☒ Community Capacity Building
- ☐ Economic Development
- ☐ Education
- ☐ Healthy Food Access
- ☐ Health
- ☒ Housing
- ☒ Human Services and Family Support
- ☐ Community Infrastructure
- ☐ Public Safety
- ☐ Workforce Development
- ☐ Low Income Housing Tax Credit (LIHTC) or other rent restricted housing
- ☐ Market rate housing
- ☐ Industrial development
- ☐ Commercial or retail development
- ☐ Other business development
- ☐ "Above ground" infrastructure – streets, sidewalks, lighting
- ☐ "Below ground" infrastructure – water, sewer, gas, electric
- ☐ Schools or other educational facilities
- ☐ Hospitals or other health care facilities

Certification of Authorized Representative for the Applicant:

**Under penalty of perjury, I certify on behalf of the Applicant that

(1) all information provided on this form is true, complete, and accurate, and

(2) the Applicant will notify the Agency immediately upon learning of any change in the information provided on this form, and

(3) I am authorized to speak for the Applicant regarding all information provided on this form.

Prefix: | First Name: Beth | Middle Name:

Last Name: Neville | Suffix:

Title: Administrator

Organization: City of Indianapolis

Signature: Beth Neville

Date: 07/30/2026

Indianapolis Continuum of Care (CoC)

Policy on Prohibition of Illicit Drug Enablement and Advancement of Recovery

I. Purpose

The purpose of this policy is to establish clear standards for all projects funded through or submitted by the Indianapolis Continuum of Care (CoC) to ensure compliance with federal requirements, promote safe and lawful housing environments, and support pathways to recovery for individuals experiencing homelessness.

II. Definition of the Continuum of Care

The Indianapolis Continuum of Care (CoC) is a community-wide planning body responsible for coordinating housing and services funding for individuals and families experiencing homelessness across Indianapolis. The CoC promotes a comprehensive and strategic approach to ending homelessness through system coordination, resource alignment, data-driven decision-making, and adherence to federal regulations established by the U.S. Department of Housing and Urban Development (HUD).

The CoC includes nonprofit organizations, local governments, housing providers, healthcare partners, and other stakeholders who collaborate to design, fund, and implement programs that address homelessness, improve health outcomes, and support long-term housing stability.

III. Policy Statement

The Indianapolis CoC affirms its commitment to operating all CoC-funded housing programs in compliance with federal law, including but not limited to 2 CFR 200.300(a), 21 U.S.C. §§ 856 and 863, and 24 CFR 578.

All project applicants must certify that:

- They will not engage in illegal racial discrimination.
- They will not operate drug injection sites or “safe consumption sites” in violation of federal law (21 U.S.C. 856(a)(1)).

- They will not knowingly permit the use or distribution of illicit drugs on property under their control in violation of 21 U.S.C. 856(a)(2).
- They will not knowingly distribute drug paraphernalia in violation of 21 U.S.C. 863.

The CoC further affirms that these prohibitions **do not require**:

- Program participants to be sober to receive assistance;
- Participation in substance use treatment as a condition of assistance; or
- Eviction or program exit for a first-time violation of a drug-related policy or lease provision.

This approach is consistent regulations under 24 CFR 578.

IV. Prohibition on Illicit Drug Enablement

In accordance with federal law and CoC policy, all CoC-funded housing projects are strictly prohibited from engaging in activities that enable the unlawful use of controlled substances.

A. Prohibited Activities

CoC-funded housing projects shall not:

1. Operate drug injection sites or "safe consumption sites";
2. Knowingly permit the use or distribution of illicit drugs on property under their ownership, lease, or control;
3. Conduct, permit, encourage, or allow any such activities under the pretext of "harm reduction"; or
4. Knowingly distribute drug paraphernalia, either on-site or off-site, in violation of federal law.

B. Definition of Drug Paraphernalia

For purposes of this policy, **"drug paraphernalia"** is defined in accordance with 21 U.S.C. § 863 as:

Any equipment, product, or material of any kind that is primarily intended or designed for use in manufacturing, compounding, converting, concealing, producing, processing, preparing, injecting, ingesting, inhaling, or otherwise introducing a controlled substance into the human body in violation of federal law.

This includes, but is not limited to, items such as pipes, water pipes, bongs, carburetion devices, smoking masks, roach clips, miniature spoons, and similar items primarily intended for drug use.

Determinations of whether an item constitutes drug paraphernalia shall be based on its intended or designed use, including relevant contextual factors such as how the item is marketed, distributed, or used in practice.

C. Clarifying Statement

Nothing in this section is intended to:

- Require program participants to maintain sobriety as a condition of assistance;
- Require participation in substance use treatment as a condition of assistance; or
- Require eviction or termination of assistance for a first-time violation of a drug-related program rule or lease provision.

Projects may establish their own program requirements, including recovery-based models, in accordance with 24 CFR 578.

V. Remedies for Non-Compliance

The CoC will take appropriate and proportionate action if a funded project is found to be in violation of this policy. Potential remedies include:

- **Corrective Action Plans (CAPs):** Required remediation steps with defined timelines;
- **Increased Monitoring:** Enhanced program oversight, including site visits and documentation review;
- **Technical Assistance:** Targeted support to achieve compliance;
- **Conditional Funding Status:** Restrictions placed on current or future funding eligibility;
- **Reallocation or Non-Renewal:** Removal or redistribution of CoC funds for continued or serious violations;

All enforcement actions will follow established CoC governance and monitoring procedures and ensure due process.

VI. Encouragement of Treatment and Recovery Supports

The Indianapolis CoC strongly encourages all funded projects to:

- Connect participants to **evidence-based substance use disorder (SUD) treatment**, including medication-assisted treatment (MAT);
- Partner with providers offering **behavioral health, recovery support services, and peer support**;
- Facilitate access to **recovery housing options** both within and outside of the CoC network;
- Integrate trauma-informed, culturally responsive approaches that support long-term recovery and stability.

The CoC recognizes that recovery is individualized and supports a range of pathways aligned with participant choice and clinical need.

VII. Project Design Flexibility

Nothing in this policy restricts or prohibits CoC-funded housing projects from:

- Requiring program participants to maintain sobriety; or
- Requiring participation in substance use treatment as a condition of assistance,

provided such requirements are implemented in accordance with 24 CFR 578 and other applicable laws.

This policy preserves a diverse range of program models, including Housing First and recovery-focused housing, while maintaining compliance with federal law.

VIII. Implementation and Certification

All project applicants must affirm compliance with this policy through required certification language in the CoC application process. The CoC will review submissions to ensure alignment with this policy prior to ranking and submission to HUD.

Advancing Recovery by Prohibiting Illicit Drug Enablement – Indianapolis CoC Narrative

The Indianapolis Continuum of Care (CoC) maintains a formal policy applicable to all CoC-funded and CoC-submitted housing projects that ensures compliance with federal law while promoting pathways to recovery and housing stability.

Policy Prohibition (Requirement 1):
All CoC-funded housing projects are explicitly prohibited from operating drug injection sites or "safe consumption sites," knowingly distributing drug paraphernalia on or off property under their control, or knowingly permitting the use or distribution of illicit drugs on property they own, lease, or manage. The policy further prohibits any project from conducting, permitting, encouraging, or allowing these activities under the pretext of "harm reduction." This prohibition aligns with 21 U.S.C. §§ 856 and 863 and is reinforced through required applicant certifications pursuant to 2 CFR 200.300(a).

Remedies and Enforcement (Requirement 2):
The CoC has established a graduated enforcement framework to ensure compliance. Projects found in violation of this policy may be subject to corrective action plans with defined timelines, increased monitoring and oversight (including site visits and documentation review), and targeted technical assistance. Continued or serious non-compliance may result in conditional funding status, non-renewal of project funding, reallocation to other providers, or referral to HUD, consistent with CoC governance and monitoring procedures. These remedies ensure accountability while providing a pathway to regain compliance.

Encouragement of Treatment and Recovery (Requirement 3):
While prohibiting illicit drug enablement, the Indianapolis CoC strongly encourages all projects to actively connect participants to evidence-based substance use disorder treatment, including medication-assisted treatment (MAT), behavioral health services, peer recovery supports, and recovery housing options within and outside the CoC. The CoC promotes trauma-informed, culturally responsive approaches and recognizes multiple pathways to recovery, emphasizing voluntary engagement and participant-centered care.

Project Design Flexibility (Requirement 4):
This policy does not impose sobriety or treatment participation requirements as a condition of assistance. Projects may operate under Housing First or recovery-oriented models, and programs that require sobriety or treatment participation are permitted in accordance with 24 CFR 578. Additionally, this policy does not require eviction or program exit for a first-time violation of a drug-related lease or program policy, allowing providers to respond proportionately and maintain housing stability whenever possible.

Certification Alignment:
All project applicants are required to formally certify adherence to these standards as part of the CoC application process, including affirmations that they will not engage in illegal racial discrimination and will comply with all applicable federal statutes related to illicit drug activity. Applications are reviewed for consistency with this policy prior to ranking and submission to HUD.

Through this clear, enforceable policy framework, the Indianapolis CoC ensures legal compliance, strengthens program accountability, and advances recovery-oriented, housing-focused solutions to homelessness.