

**CITY OF GARY, INDIANA SUBSTANTIAL AMENDMENTS  
TO THE 2016-2020 CONSOLIDATED PLAN AND 2019 ANNUAL ACTION PLAN**

**The following is a summary and language that amends the 2016-2020 Consolidated Plan and 2019 Annual Action Plan.**

**Background:**

The City of Gary, Indiana's federal Consolidated Plan details the funding strategy for the Community Development Block Grant (CDBG), Emergency Solutions Grant (ESG), and HOME Investment Partnerships Programs, for the period between 2016 and 2020. The Annual Action Plan details each year within the 5-year Consolidated Plan and outlines the implementation of annual funding, which is developed through significant public input, analyses, and planning.

The City of Gary's Citizen Participation Plan (CPP) describes the efforts that the City will take to encourage its residents to participate in developing these plans. It also provides requirements for public process when a "substantial amendment" to the Annual Action Plan is proposed. The following changes constitute a substantial amendment and require public notice as described in the CPP:

- A significant change to an activity's funding priorities or procedures for distribution of funds
- Funding of a new activity not previously described in the Annual Action Plan
- Substantial change in the scope, purpose, location or beneficiary of an activity
- Increases by the greater of 10% change of the total allocation of the City for the year

However, due to COVID-19, the United States Department of Housing and Urban Development (HUD) has issued guidance that waives the Citizen Participation and Consultation requirements for ESG-CV entitlement recipients, although how the allocation will be used must be published on Government web site.

Additionally, HUD has awarded supplemental funding through the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) that requires programming in the 2019 Annual Action Plan.

**Proposed Substantial Amendments:**

The City of Gary is proposing the following amendment to the 2019 Annual Action Plan in order to amend an eligible activity that was previously identified:

- Amend the current proposed subrecipient from Catholic Charities to the Continuum of Care of NWI for the use of Homelessness Prevention funds.
- Amend the current description for the use of Homelessness Prevention funds to: ESG funds will be used for assistance to individuals and families who are at imminent risk of homelessness or seeking shelter due to the COVID-19 pandemic. Approximately 40 households will be assisted. (ESG: \$50,000)

The City of Gary is proposing the following amendment to the 2019 Annual Action Plan in order to reallocate current program funds from projects/activities that did not expend the projected funds within the fiscal year, as well as supplemental Emergency Solutions Grant (ESG-CV) funding established by the CARES Act.

| Summary of Activities      |                                                             | Project Description                                                                                                                                                                                                                                                                                                            |
|----------------------------|-------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Prior Project Name:</b> | <b>Catholic Charities Homeless Prevention</b>               | ESG funds will be reprogrammed used for assistance to individuals and families who are at imminent risk of homelessness or seeking shelter due to the COVID-19 pandemic. Approximately 40 households will be assisted.                                                                                                         |
| <b>New Project Name:</b>   | <b>Continuum of Care Network of NWI Homeless Prevention</b> |                                                                                                                                                                                                                                                                                                                                |
| <b>Funding:</b>            | ESG                                                         |                                                                                                                                                                                                                                                                                                                                |
| Original Amount:           | \$50,000                                                    |                                                                                                                                                                                                                                                                                                                                |
| Additional Amount:         | \$0                                                         |                                                                                                                                                                                                                                                                                                                                |
| Total:                     | \$50,000                                                    |                                                                                                                                                                                                                                                                                                                                |
| Summary of Activities      |                                                             | Project Description                                                                                                                                                                                                                                                                                                            |
| <b>Project Name:</b>       | <b>Continuum of Care Network of NWI HP AND RRH</b>          | CARES Act funding from Emergency Solutions Grant (ESG-CV) funding in the amount of \$997,166 made available by the CARES Act will provide rapid rehousing services, homelessness prevention services, and administrative costs. Expenditures will be related to COVID-19 costs for a total of 175 households will be assisted. |
| <b>Funding:</b>            | ESG-CV                                                      |                                                                                                                                                                                                                                                                                                                                |
| Original Amount:           | \$0                                                         |                                                                                                                                                                                                                                                                                                                                |
| Additional Amount:         | \$997,166                                                   |                                                                                                                                                                                                                                                                                                                                |
| Total:                     | \$997,166                                                   |                                                                                                                                                                                                                                                                                                                                |

### Analysis

This proposal qualifies as a substantial amendment because it meets all three criteria below:

- Substantial change in funding priorities or procedures for distribution of funds.
- Substantial change in the scope, purpose, location or beneficiary of an activity.
- Funds identified in the Consolidated Plan did not previously report, in the plan, additional funding made available by the CARES Act.

Changes to the 2019 Annual Action Plan are primarily a result of:

1. The reprogramming of \$50,000 of 2019 Emergency Solutions Grant (ESG) funds that were not committed nor expended.
2. Programming \$997,166 in Emergency Solutions Grant (ESG-CV) funding made available under the CARES Act.

**On page 55 of the approved 2019 Annual Action Plan, amend the ESG Activities in section AP-38 Project Summary to replace Catholic Charities Homeless Prevention with Continuum of Care Network of NWI Homeless Prevention, and on page 68 add the ESG CARES grant project as follows:**

#### **AP-38 Project Summary Project Summary Information Table 1 – Project Summary**

|    |                  |                                                                                                                                                                                                                  |
|----|------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 28 | Project Name     | ESG19GARY                                                                                                                                                                                                        |
|    | Target Area:     | City-wide                                                                                                                                                                                                        |
|    | Goals Supported: | <ul style="list-style-type: none"> <li>• HO-1 Operation/Support</li> <li>• HO-2 Prevention and Housing</li> <li>• HO-3 Housing</li> <li>• HO-4 Continuum of Care</li> <li>• AM-1 Overall Coordination</li> </ul> |
|    | Needs Addressed: | <ul style="list-style-type: none"> <li>• Housing Priority</li> <li>• Administration, Planning and Management Priority</li> </ul>                                                                                 |

|                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                   |
|------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Funding:                                                                                 | ESG: \$279,012                                                                                                                                                                                                                                                                                                                                                                    |
| Description:                                                                             | Provide funding for Admin, Rapid Rehousing Program, Homelessness prevention, shelter operations, and outreach for the ESG program.                                                                                                                                                                                                                                                |
| Target Date:                                                                             | 06/15/2020                                                                                                                                                                                                                                                                                                                                                                        |
| Estimate the number and type of families that will benefit from the proposed activities: | ESG funding will be awarded to homeless service providers to assist 40 households with homelessness prevention activities (0-50% MFI); assist 80 persons with rapid rehousing assistance, provide renovation of a shelter for stays to 200 homeless persons, and shelter operations for stays for up to 300 homeless youth (0-30% MFI) for a total of 620 persons to be assisted. |
| Location Description:                                                                    | <ul style="list-style-type: none"> <li>Continuum of Care Network, 839 Massachusetts St., Gary, IN 46402</li> </ul>                                                                                                                                                                                                                                                                |
| Planned Activities:                                                                      | <ul style="list-style-type: none"> <li>Continuum of Care Network of NWI – Homelessness Prevention: ESG funds will be used for assistance to low-income individuals/ households who are at imminent risk of homelessness or seeking shelter due to the COVID-19 pandemic. Approximately 40 individuals/households will be assisted.</li> </ul>                                     |

|    |                                                                                          |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|----|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 52 | Project:                                                                                 | ESG-CARES (2019)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|    | Target Area:                                                                             | Citywide                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|    | Goals Supported:                                                                         | HO-2 Prevention and Housing<br>AM-1 Overall Coordination                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|    | Needs Addressed:                                                                         | Homeless Priority                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|    | Funding:                                                                                 | ESG-CV: \$997,166                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|    | Description:                                                                             | The City will utilize ESG funds, through the Continuum of Care of NWI, to support Homeless Prevention and Rapid Rehousing programs to provide financial assistance to include deposits/ rental assistance, case management services, and other eligible services as needed to keep individuals and families from experiencing homelessness due to the COVID-19 emergency. ESG funds will be used to support the administration of the ESG-CARES program by the Continuum of Care of NWI. ESG Allocations by Component - Homeless Prevention: \$628,215; Rapid Rehousing: \$269,235; Administration: \$99,716 (10%) |
|    | Target Date:                                                                             | 06/30/2020                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|    | Estimate the number and type of families that will benefit from the proposed activities: | 175 low income individuals/households                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|    | Location Description:                                                                    | Citywide (service locations vary)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|    | Planned Activities:                                                                      | <ul style="list-style-type: none"> <li>Homeless Prevention</li> <li>Rapid Rehousing</li> <li>Administration</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |

On page 26 of the approved 2019 Annual Action Plan, add the ESG-CARES Program grant in Section AP-15 Expected Resources:

AP-15 Expected Resources Table 5 – Expected Resources – Priority Table

| Program      | Source of Funds  | Uses of Funds                               | Expected Amount Available Year 1 |                    |                          |           | Expected Amount Available Remainder of Con Plan \$ | Narrative Description                                                                                                                                                                                                                                     |
|--------------|------------------|---------------------------------------------|----------------------------------|--------------------|--------------------------|-----------|----------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|              |                  |                                             | Annual Allocation: \$            | Program Income: \$ | Prior Year Resources: \$ | Total: \$ |                                                    |                                                                                                                                                                                                                                                           |
| ESG-CV CARES | public - federal | Homelessness Prevention and Rapid Rehousing | 997,166                          | 0                  | 0                        | 997,166   | 997,166                                            | Additional funding was awarded in the stated amount under the COVID-19 CARES Act. ESG-CV funding does not require a match; however, funds will be used to prepare for, prevent, or respond to the COVID-19 pandemic issues. Memorandum issued 04/02/2020. |