

-COVER PAGE-

Table of Contents

| | |
|---|-----------|
| City of Gary, Indiana, HOME-ARP Allocation Plan..... | 3 |
| Consultation | 3 |
| <i>Describe the consultation process including methods used and dates of consultation:</i> | 3 |
| <i>List of organizations consulted:</i> | 4 |
| <i>Summarize feedback received and results of upfront consultation with these entities:</i> | 13 |
| Public Participation | 14 |
| <i>Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:</i> | 14 |
| <i>Narrative description of public participation process:</i> | 14 |
| <i>Describe any efforts to broaden public participation:</i> | 15 |
| Needs Assessment and Gaps Analysis | 16 |
| <i>Describe the size and demographic composition of qualifying populations within the PJ's boundaries:</i> | 16 |
| <i>Identify any gaps within the current shelter and housing inventory as well as the service delivery system:</i> | 26 |
| <i>Identify priority needs for qualifying populations:</i> | 28 |
| <i>Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:</i> | 30 |
| HOME-ARP Activities | 30 |
| <i>Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:</i> | 30 |
| <i>Use of HOME-ARP Funding</i> | 32 |
| HOME-ARP Production Housing Goals..... | 34 |
| Preferences, Referral Methods, and Limitations..... | 35 |
| HOME-ARP Refinancing Guidelines | 37 |

City of Gary, Indiana, HOME-ARP Allocation Plan

Consultation

Describe the consultation process including methods used and dates of consultation:

Response: With assistance from our consulting partner, Homebase, the City of Gary engaged with stakeholders in the community. In addition to work we conducted on an annual needs and gaps analysis, the Consolidated Plan, and EHV activities, the City interviewed and created a website to inform stakeholders and community members about HOME-ARP and to gather feedback, released a survey/questionnaire community-wide, and once we released the draft Allocation Plan, solicited additional feedback through a second community-wide survey and through public comment submission.

The City of Gary is part of the larger statewide Balance of State Continuum of Care (CoC). Local providers from Gary participate in their monthly meetings. Since the City has been awarded HOME-ARP funding, they have consulted with the CoC on how best to use the more than \$2.49 million in HOME-ARP funding. Before filing the draft Allocation Plan, the City and Homebase met with CoC leadership to obtain feedback as the team finalized the draft Allocation Plan. Their feedback is included in the consultation process information below.

In addition to regularly consulting with the CoC, Homebase interviewed more than 15 key stakeholders who work throughout the City of Gary. The organizations interviewed included service providers and community-based organizations who do not traditionally work with the homeless system of care, but still serve the qualifying populations. The interviews enabled the City of Gary to discuss not only the needs and gaps in the homeless system of care, but also to understand the broader needs of all qualifying populations in Gary. The interviewees included organizations working within the homeless system of care, including CoC members, as well as city agencies, faith-based organizations, and community-based organizations.

The City also released a community-wide survey that was circulated through listservs, shared through nonprofit organizations, and promoted on the City's website. The survey allowed the City to differentiate responses from key stakeholders and the broader public. Respondents including people with lived expertise of homelessness, policymakers, members of the public, and people associated with local nonprofit or community-based organizations. An additional 15 nonprofit organizations shared their thoughts about the needs and gaps in the City of Gary and how the City could best use their HOME-ARP funds through the online survey and questionnaire. Their thoughts are shared in the consultant section of this Allocation Plan (below).

List of organizations consulted:

| Agency Name | Type of Organization | Method of Consultation | Feedback (where multiple persons responded from an agency, their comments have been summarized/combined) |
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| Broadway Area CDC | Community Development Corporation | Survey response | <p>Eligible Populations: People experiencing homelessness, people at risk of homelessness, people experiencing domestic violence</p> <p>Eligible Activities: Each of the activities should receive some funding</p> <p>Supportive Services: Case management, childcare, credit repair, employment assistance, housing search and counseling, life skills training, mental health services, short- and medium-term financial assistance for rent.</p> |
| Catholic Charities | Nonprofit homeless service provider, active member of the Continuum of Care (CoC) | 1:1 interview | <p>Eligible Populations: All – but other resources are available for people experiencing homelessness, people at imminent risk of homelessness, and people fleeing DV, so would like to prioritize other populations where resources are not available to help – like people couch surfing and doubled up. Especially seniors and families who currently have to be split up in shelters based on gender.</p> <p>Eligible Activities: All should be funded but prioritize non-congregate shelter and affordable rental housing.</p> <p>Supportive Services: Childcare, transportation, coverage of needed medications, legal services, assistance obtaining documents, especially real ID.</p> |
| Center for Workforce Innovations (WorkOne) | Nonprofit workforce development agency | 1:1 Interview | <p>Eligible Populations: People experiencing homelessness and veterans</p> <p>Eligible Activities: All if possible. But given the funding amount, tenant-based rental assistance and non-congregate shelter</p> <p>Supportive Services: childcare, educational assistance, mental health services, employment assistance and job training (even with low unemployment, but people come in and don't have the training for the job), credit repair, and financial assistance</p> |

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| Community HealthNet Health Centers | Community Health Center | 1:1 interview | <p>Eligible Populations: People fleeing/attempting to flee domestic violence</p> <p>Eligible Activities: Non-congregate shelter renovation or development.</p> <p>Supportive Services: Wrap-around services, especially education supports for children</p> <p>Other comments: Need a long-term strategic vision to prevent and end homelessness in Gary</p> |
| Continuum of Care, Northwest Indiana | Local planning council for the implementation of housing services | Survey Response | <p>Eligible Populations: People experiencing homelessness and people experiencing domestic violence.</p> <p>Eligible Activities: Affordable rental housing.</p> <p>Supportive Services: Outreach services – develop a true outreach team; mental health services; substance abuse services; transportation (is expensive and complex); case management and coordination</p> |
| Continuum of Care, Northwest Indiana | Local planning council for the implementation of housing services | 1:1 interview | <p>Eligible Populations: Homeless, at-risk of, and people experiencing DV, especially those on the lower end of the VI-SPDAT scoring system who will otherwise not be prioritized for housing placement.</p> <p>Eligible Activities: Site acquisition for affordable housing</p> <p>Supportive Services: Outreach services – develop a true outreach team; mental health services; substance abuse services; transportation (is expensive and complex); case management and coordination</p> |
| Crisis Center, Inc. | Nonprofit whose mission is to strengthen communities, empower families with an emphasis on children in need of safe shelter and support | Survey Response | <p>Eligible Populations: All populations</p> <p>Eligible Activities: Some of the funding to go to rental housing and some to go to supportive services.</p> <p>Supportive Services: Case management, childcare, employment assistance, and housing search and counseling</p> <p>Other comments: All of the populations above deserve our help. There are many families out</p> |

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| | | | there that are one paycheck away from homelessness. |
| Edgewater Systems for Balanced Living | Primary care and behavioral health | 1:1 interview | <p>Eligible Populations: Fleeing/attempting to flee domestic violence.</p> <p>Eligible Activities: Shelter improvements and additional non-congregate shelter.</p> <p>Supportive Services: Need all services, especially housing search and placement</p> <p>Other comments: Anything done needs to be sustainable for the long-term, not just the initial expenditure of government funds. Look to utilize under-used buildings in Gary that are in convenient, safe, walkable locations.</p> |
| Faithworks Network, Inc. | Faith-based | Survey response | <p>Eligible Populations: All of the populations</p> <p>Eligible Activities: All of the activities should receive some of the funding.</p> <p>Supportive Services: Childcare, education services, employment services, food, life skills training, mental health services, outreach services, short-term and medium-term financial assistance for rent.</p> |
| First Tabernacle Baptist Church of Gary | Faith-based | Survey response | <p>Eligible Populations: Other populations that don't meet the HUD definition for homelessness</p> <p>Eligible Activities: Some of the funding for affordable rental housing and supportive services.</p> <p>Supportive Services: employment assistance, legal services, mental health services</p> <p>Other comments: In Gary, many homeowners need assistance also. They pay taxes, deal with the increase in cost of goods and services but when programs are available, they are not included because the guidelines make them not eligible just because they have an income.... It not equitable and leaves out the working class.</p> |
| Gary Commission for Women | Community-based advocacy and housing | 1:1 interview | <p>Eligible Populations: Homeless and At-Risk of Homelessness (McKinney-Vento Population)</p> |

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| | provider for homelessness, domestic violence, teen dating violence, and sexual assault | | <p>Eligible Activities: Low-Cost rental hosting, Non-Congregate Shelter</p> <p>Supportive Services: Would like to see longer term rental assistance, life skills, outreach, case management, legal services to understand tenant rights.</p> <p>Other comments: Seeing a surge in larger families requesting help. Difficult to find accommodations to prevent splitting families. On average receives about 25 calls a day of people needing help. Working with McKinney Liaison.</p> |
| Gary Community Health Net Health Centers | Community-based health care | 1:1 interview | <p>Eligible Populations: At-risk of homelessness and Domestic Violence Victims</p> <p>Eligible Activities: Non-Congregate Shelters and Supportive Services (combination of both would insure successful results for residents)</p> <p>Supportive Services: Life skills training, job training, credit repair, ALL services needed in Gary. Housing Specialists needed to assist with finding and locating housing resources.</p> <p>Other comments: Sustainability is important. Gary needs a long-term and strategic vision. Create a safe, walkable community (proximity to pharmacy, grocery store, park); look at underutilized space in Gary for development.</p> |
| Gary Community School Corporation – McKinney-Vento liaison | Unified School District for the City of Gary | 1:1 interview | <p>Eligible Populations: Women and children (200 school-aged children meet McKinney-Vento homeless definition in school system), youth, families with adolescent males.</p> <p>Eligible Activities: Non-congregate shelter for families (can convert vacant school buildings) wrap-around services</p> <p>Supportive Services: childcare, food, life skills training, education services, mental health services, case management, legal services, transportation, credit repair.</p> <p>Other comments: Fill all the gaps, “leave no space for people to fail.” Remove barriers that currently exist.</p> |
| Gary Health Department | Public agency that addresses | 1:1 interview | <p>Eligible Populations: All, but mostly people at risk of homelessness</p> |

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| | the needs of all qualifying populations | | <p>Eligible Activities: Each should have some funding. Lots of calls for shelter.</p> <p>Supportive Services: Employment assistance, food, mental health services, transportation</p> <p>Other comments: City of Gary is very much a food desert.</p> |
| Gary Housing Authority | Public Housing Agency | 1:1 interview | <p>Eligible Populations: All Eligible Populations need support. The Housing Authority main entry way into homelessness has been through the EHV program.</p> <p>Eligible Activities: Affordable Permanent Housing Development and Supportive Services</p> <p>Supportive Services: All Supportive Services</p> <p>Other Comments: Would like to improve the process created through the EHV process. Would like to create more Permanent Housing and commit vouchers to them. The Housing Authority is interested in braiding capital development, federal, and local funding to spew development of housing and supportive services under one roof (such as navigation or envision centers).</p> |
| Gary Human Relations Commission | Public agency that addresses the needs of all qualifying populations by promoting equal opportunity with regard to race, color, religion, sex, gender identity, sexual orientation, national origin, ancestry or handicap in employment, education, housing, public services and accommodations. | 1:1 interview | <p>Eligible Populations: They all need support and services but at Commission, mostly see households at risk of eviction and people whose privacy is violated related to sharing health information.</p> <p>Eligible Activities: Affordable rental housing</p> <p>Supportive Services: Childcare, credit repair, employment assistance, housing counseling, legal services, mental health services, short-term and medium-term financial assistance, substance use services, transportation</p> <p>Other comments: Significant discrimination against low-income people seeking housing and other services. Also seeing age discrimination in housing (but no recourse under local laws)</p> |
| Gary Public Transportation Corp. | Public agency that addresses | 1:1 interview | <p>Eligible Populations: All of the populations.</p> |

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| | the needs of all qualifying populations | | <p>Eligible Activities: All of the activities should receive some funding</p> <p>Supportive Services: All of the supportive services are needed in Gary.</p> |
| Guaranteed Income Validation Effort (GIVE) | Nonprofit working to make poverty escapable | Survey response | <p>Eligible Populations: All of the populations</p> <p>Eligible Activities: Some of the funding should go to each of the eligible activities.</p> <p>Supportive Services: all of the supportive services</p> <p>Other comments: Need to meet the needs of people where they are, no matter the category they fall under. This will reduce the homeless number, help families keep their homes and build up communities.</p> |
| Habitat for Humanity of Northwest Indiana | Nonprofit housing developer to households whose incomes fall between 30 – 80% AMI | 1:1 interview and survey response | <p>Eligible Populations: People below 30% AMI. Households experiencing domestic violence, and people in need of critical home repair living in substandard housing.</p> <p>Eligible Activities: Supportive services (based on interview). All Activities (based on survey response)</p> <p>Supportive Services: Childcare, access to food</p> <p>Other comments: City of Gary is a food desert. There is only one grocery store for the entire City. Also, there is a childcare desert in the City of Gary.</p> |
| Healthy Communities at La Porte County | Nonprofit working on health care enrollment and tobacco cessation | Survey response | <p>Eligible Populations: All of the populations</p> <p>Eligible Activities: Each of the activities should receive some of the funding</p> <p>Supportive Services: case management, childcare, credit repair, education services, employment assistance, financial assistance, food, life skills training, mental health services, outpatient services, outreach services, services for special populations, short- and medium-term financial assistance with rent, substance use treatment, transportation</p> |

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| Legacy Foundation | Community foundation | 1:1 Interview | <p>Eligible Populations: People at-risk of homelessness; people at greatest risk of housing instability.</p> <p>Eligible Activities: Affordable rental housing; nonprofit capacity-building. Focus within one neighborhood to maximize impact (i.e., Aetna Neighborhood). Rental housing stock is very low quality and needs resources so that people can continue to reside in them.</p> <p>Supportive Services: childcare, early child education, access to health care and pharmacy resources</p> |
| Lutheran Church | Faith-based | Survey response | <p>Eligible Populations: People fleeing domestic violence</p> <p>Eligible Activities: Each of the activities should receive some of the funding</p> |
| Mayor’s Organization on Disabilities | Nonprofit working to promote the inclusion and empowerment of people with disabilities | 1:1 interview | <p>Eligible Populations: 1. People experiencing homelessness; 2. people at risk of homelessness and 3. people fleeing/attempting to flee domestic violence (in that order) Also mentioned that homeless youth/young adults as a population that is under-counted.</p> <p>Eligible Activities: Sees a need for all 4 activities. Mentioned that there is no emergency shelter for women/families.</p> <p>Supportive Services: All services are needed.</p> |
| Project Rebuild | Nonprofit whose mission is to help see the underline issues that cause the truancy and assist the families get back on track | Survey response | <p>Eligible Populations: All populations</p> <p>Eligible Activities: Some of the funding to each of the eligible activities</p> <p>Supportive Services: case management, childcare, credit repair, education services, housing search and counseling, short- and mid-term financial assistance, and transportation</p> |
| Rebuilding the Breach Ministries | Nonprofit providing congregate shelter for single women | 1:1 interview | <p>Eligible Populations: People experiencing homelessness</p> <p>Eligible Activities: Tenant-based rental assistance</p> <p>Supportive Services: Financial assistance is a priority. Also need for outpatient</p> |

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| | | | health/mental health/substance abuse services. |
| Salvation Army | Nonprofit providing services for those in need | 1:1 interview | <p>Eligible Populations: All four of the populations</p> <p>Eligible Activities: Use the @\$2.5 to buy one of the abandoned schools and convert it to shelter and affordable rental housing both.</p> <p>Supportive Services: Case management, mental health services, housing search and counseling would be priority – but everything is needed.</p> |
| Sojourner Truth House | Nonprofit service provider (provides supportive services for women and children in shelters and permanent supportive housing) | 1:1 interview | <p>Eligible Populations: People at-risk of homelessness; people experiencing homelessness; people fleeing domestic and other violence.</p> <p>Eligible Activities: NCS; TBRA; supportive services; affordable rental</p> <p>Supportive Services: Mental health services; transportation; legal services; addiction treatment; support for mothers.</p> <p>Other comments: “There’s not a lot of ‘in-the-middle’ coverage”</p> |
| South Shore Neighborhood Development Corporation | Nonprofit developer | 1:1 Interview | <p>Eligible Populations: People at-risk of homelessness; people at greatest risk of housing instability.</p> <p>Eligible Activities: Affordable rental housing; supportive services</p> <p>Supportive Services: Early childhood education; food insecurity.</p> |
| 21 st Century Charter School of Gary | Local charter school | Survey response | <p>Eligible Populations: All of the populations</p> <p>Eligible Activities: Each of the activities should receive some funding.</p> <p>Supportive Services: Education services, employment assistance, food, landlord tenant liaison, life skills training, mental health services, services for special populations, transportation</p> |
| Urban League of NW Indiana | Nonprofit that provides services | Survey response | <p>Eligible Populations: All populations</p> |

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| | in education, financial stability, health & wellness, social justice and DEI to improve the quality of life among citizens and all other stakeholders | | <p>Eligible Activities: Some funding should go to each of the eligible activities</p> <p>Supportive Services: credit repair, education services, housing search and counseling, landlord tenant liaison, life skills training, mental health services</p> |
| Webb House, Inc. | Provides housing for homeless veterans | Survey response | <p>Eligible Populations: All of the qualifying populations,</p> <p>Eligible Activities: All of the funding toward affordable rental housing, some of the funding for the three other activities.</p> <p>Supportive Services: childcare, credit repair, education services, employment assistance, housing search and counseling, mental health services, outreach services, services for special populations, short- and medium-term financial assistance for rent, substance use services.</p> |
| WorkOne Gary | Nonprofit that helps people find sustainable employment | Survey response | <p>Eligible Populations: All</p> <p>Eligible Activities: All of the activities should receive some funding.</p> <p>Supportive Services: Childcare, credit repair, housing search and counseling, landlord/tenant liaison, and outreach services</p> |
| Zion Progressive Cathedral & City of Zion, Inc. | Faith-based organization working on housing | Survey response | <p>Eligible Populations: People experiencing homelessness, people at risk of homelessness, and people fleeing domestic violence et. Al.</p> <p>Eligible Activities: Some of the funding should be used toward affordable rental housing and some should be used toward tenant-based rental assistance.</p> <p>Supportive Services: Credit repair, educational services, short-term and medium-term financial assistance for rent, and transportation</p> |

Summarize feedback received and results of upfront consultation with these entities:

Response: The City received substantial feedback from consultants during the process, including before drafting, as part of the community's Consolidated Plan, in specific one-on-one interviews, and through two separate surveys (one before drafting the Allocation Plan and one in reaction to the proposed Allocation Plan).

In general, many consultants felt that all of the qualifying populations should be served with HOME-ARP funds. While not all consultants expressed an interest in preferring one of the qualifying populations over any of the other three, some consultants did feel that people experiencing homelessness should be prioritized for affordable housing, while others felt if there was to be a priority, it should be people at risk of housing instability. Other consultants shared that people feeling domestic violence should be a priority.

Similarly, most consultants felt that some of the funding should be used toward all four of the eligible activities, affordable housing, tenant-based rental assistance, non-congregate shelter, and supportive services. For those consultants who suggested prioritizing the funding to only certain activities, most felt that affordable housing and/or non-congregate shelters are most needed in the City of Gary.

Many stakeholders shared that there are housing vouchers and rental assistance available, but there is a dearth of affordable housing units throughout the City. Moreover, most stakeholders that were interviewed shared that the incidence of substandard housing is very high in the City. They shared that the quality of affordable housing that exists in the City is very low, with many households living in places that need considerable work to make them more habitable. Almost all consultants spoke to the dearth of services throughout the City, not only traditional homeless system services, but basic services for anyone living in Gary. For example, there are no grocery stores located in the City limits. Transportation is limited in the City, not only in the hours of operation, but the locations served by public transit. As a result, for many households, they must have a car to be able to drive outside of Gary to get their food. Similarly, many consultants spoke to the dearth of childcare services in the City. The lack of childcare services has been more pronounced since the COVID pandemic; many of the institutional childcare providers no longer offer services in the City, leaving most of the providers home-based providers with limited capacity.

The City's Housing Authority, who is very aware of affordable options available in the City, also shared that the greatest gap is the insufficient housing stock in the city. Similar to the CoC, they shared that the City needs to create housing stock that has owners and landlords willing to rent to the HOME-ARP qualifying populations.

The primary shelter for women is currently unavailable as they renovate the building to create a non-congregate shelter. The primary shelter for men is in dire need of renovation or relocation to a new facility. There is a great need for emergency shelter that will accept anyone experiencing homelessness, the challenge that the community has faced over and over again is the lack of funding and organizational commitment to *operate* an emergency shelter.

All consultants were asked about the types of supportive services that were needed in the community. There was a broad range of services that consultants would prioritize, but many wanted to see HOME-ARP funds going toward all supportive services, especially childcare and transportation.

Public Participation

In accordance with Section V.B of the Notice (page 13), PJs must provide for and encourage citizen participation in the development of the HOME-ARP allocation plan. Before submission of the plan, PJs must provide residents with reasonable notice and an opportunity to comment on the proposed HOME-ARP allocation plan of **no less than 15 calendar days**. The PJ must follow its adopted requirements for “reasonable notice and an opportunity to comment” for plan amendments in its current citizen participation plan. In addition, PJs must hold **at least one public hearing** during the development of the HOME-ARP allocation plan and prior to submission.

PJs are required to make the following information available to the public:

- The amount of HOME-ARP the PJ will receive, and
- The range of activities the PJ may undertake.

Throughout the HOME-ARP allocation plan public participation process, the PJ must follow its applicable fair housing and civil rights requirements and procedures for effective communication, accessibility, and reasonable accommodation for persons with disabilities and providing meaningful access to participation by limited English proficient (LEP) residents that are in its current citizen participation plan as required by 24 CFR 91.105 and 91.115.

Describe the public participation process, including information about and the dates of the public comment period and public hearing(s) held during the development of the plan:

Response:

- Notice to public, almost two weeks prior to public hearing: January 13, 2023
- Public comment period start date: January 17, 2023
- Posting Draft Allocation Plan date: January 17, 2023
- Public comment period end date: February 17, 2023
- Public hearing date: January 24, 2023

Narrative description of public participation process:

Response: The City of Gary established a separate webpage focused on the HOME-ARP funding opportunity. Posted on the webpage is information about the HOME-ARP funding opportunity and materials about the process that were prepared by HUD, as well as materials the City developed.

The website launched on November 4, 2022, to include the public voice in the development of the draft Allocation Plan. The City shared the webpage through social media, announced its availability to local media, and circulated the link through our local network of partner organizations and agencies, asking them to advertise the website widely.

Prior to posting the Allocation Plan draft, the City developed a questionnaire to solicit comment from the public. The questionnaire was made available on the City's HOME-ARP webpage to complete online (through Survey Monkey), as well as in hard copy that could be mailed to the City or brought in-person to the City. The questionnaire provided information about the amount of HOME-ARP funding allocated to the City and background information on the qualifying populations and eligible activities that HOME-ARP is intended to fund. With the background information and context provided, we asked the public to share their opinions about who would best be served by HOME-ARP funds (from amongst the qualifying populations) and which eligible activities were most needed in the community.

Subsequently, on January 13, 2023, the City publicized the public hearing two weeks in advance in the local newspapers, radio, local government channel, and other resources, to assure participation and encourage citizens' involvement. On January 17, 2023, the City officially released the draft Allocation Plan. We posted the Plan prominently on the City's website and promoted it on our social media, with local media, at Gary Public Library Branches, the City's Community Development Department, as well as promoted it with our local network of partner organizations and agencies.

On January 17th, the City also provided a new opportunity to solicit public comment in response to the draft Allocation Plan. Like the initial questionnaire, the public could provide their comments online (through Survey Monkey), by a hard copy, or through a dedicated email for a thirty-day period through February 17, 2023, per the City of Gary's Citizen Participation Plan.

Almost two weeks after publicizing the public hearing, the City held a public hearing on January 24, 2023. The two-hour meeting included a presentation by the City and its consultant, Homebase. We provided background information about HOME-ARP funding, qualifying populations, eligible activities, and the needs assessment and gaps analysis. We presented the draft Allocation Plan and gave ample opportunity for people to provide comments verbally, share their thoughts and provide comments to a dedicated email or through the online public comment survey.

Describe any efforts to broaden public participation:

Response: While the HOME-ARP funding is slated to address homelessness, the City promoted the webpage, opportunity for public comment, and the public hearing far beyond the homeless system of care. We asked all City agencies to promote the webpage, questionnaire and public hearing announcement with their constituents, partner organizations, on their social media, and with their local media contacts. We did similar outreach to announce the posting and public comment for the draft Allocation Plan. This included the Continuum of Care sending it out to their full listserv with a breadth of community stakeholders.

In the past, the City usually receives approximately no more than 25 responses to surveys and questionnaires when seeking input on the local homeless system of care. When we asked for public comment *in advance* of drafting the Allocation Plan, we received over 130 responses to the survey.

The City provided for paper copies of the survey to ensure people without access to internet could participate, the survey was also available in Spanish for anyone who requested a Spanish translation.

Summarize the comments and recommendations received through the public participation process either in writing, or orally at a public hearing:

Will be inserted after completion of public participation process.

Needs Assessment and Gaps Analysis

Describe the size and demographic composition of qualifying populations within the PJ's boundaries:

General population of the City of Gary:

Response: The City of Gary is located in Indiana in Lake County. Lake County is in the upper northwest part of Indiana and is considered part of the greater Chicago metropolitan area. According to the U.S. Census Bureau (ACS), the population in the City of Gary in 2021 was 68,325. In 2021, 67% of the population was over 18 years old, 25.7% were under 18 years old, and 19.3% were age 65 years or older.

The majority of the population in the city of Gary is Black/African American (77.9%), only 14.5% of Gary residents are White, 4.5% are two or more races, and the remaining racial groups each comprise less than 1% of the City's population. Less than 10% of the population (8.9%) identifies as Hispanic/Latino.

Based on data from 2016-2020, 12.6% of the City of Gary residents under age 65 years have a disability and 11.8% are uninsured. In Gary, over one third (33.1%) of residents live below the federal poverty level (compared to only 15.8% in Lake County and 12.2% in the state of Indiana). The median value of an owner-occupied home was \$68,400 and the median gross rent in the community was \$792/ month.¹

Homeless as defined in 24 CFR 91.5

Response: The most recent Gary PIT count (2022) identified 272 people experiencing homelessness, 209 of whom were living in shelters and 63 who were living unsheltered on the streets, in vehicles, or encampments. Adults over 18 years old comprised 77% of Gary's homeless population. 63 children under 18 years were identified as homeless, with 55 living in shelters, while 8 were living unsheltered. An additional number of young adults (aged between 18 and 24) also experienced homelessness (12 living sheltered, 10 living unsheltered). Children and young adults comprised 31% of the homeless population. According to the most recently available data, 102 students in the Gary Community School

¹ [United States Census Bureau, Quick Facts](#), for United States, Indiana, Lake County, and the City of Gary. U.S. Census Bureau.

Corporation were reported as homeless or housing unstable². Many of those children and youth do not meet the definition of homelessness for purposes of the PIT count but fall under the “other special populations” definition for HOME-ARP purposes.

An analysis of Gary’s last official PIT count (2022) for Lake County where the City of Gary is located, reveals distinctions in how different racial groups are represented among the homeless population compared to the general population. Gary counted 272 people experiencing homelessness in January 2022. White individuals comprised only 31% (85 individuals) of the homeless population (compared to 14.5% of the general population). At the same time, Black/African American individuals comprised 59.5% (162 individuals) of the homeless population (compared to 77.9% of the general population) and people identifying as multiple races comprised 0% of the homeless population (compared to 4.5% of the general population).

At the last official PIT count (2022), 19.1% of Gary homeless residents self-reported having a severe mental illness (SMI), while 7.3% reported experiencing a substance use disorder (SUD), and 8.4% identified as adult survivors of domestic violence.

At Risk of Homelessness as defined in 24 CFR 91.5 (includes households that (1) have incomes below 30% of the area median income; (2) lack sufficient resources and support networks to avoid becoming homeless; (3) meet additional conditions such as living in the home of another.

Response: For people at risk of homelessness, it is useful to understand the underlying circumstances of people living in the Greater Gary area.

- The most recent data disclosing median gross rent indicates that the median gross rent in Gary is \$792/month.³ For people to be able to afford that rent and contribute 30% or less of their household income toward housing, they would need to earn at least \$14 per household per month (or \$29,000 annual income) which requires more than \$14.00/hour wage. The minimum wage in Gary, Indiana for 2022 is \$7.25/hour.⁴ Minimum wage would have to increase by almost 100% for households earning minimum wage to afford local median rent.
- The rates of poverty in the area are higher than both state and national averages. More than one in three individuals (33%) in the City of Gary lives below the federal poverty level (FPL), more than twice the number that live below the poverty level in Lake County at 15.8%, the state of Indiana at 12.2% of the national average, at 11.6%.⁵ In Lake County, children under the age of 11 comprise the largest age group who are living in poverty.⁶

² [Indiana Youth Institute 2016](#)

³ [United States Census Bureau, Quick Facts](#), for United States, Indiana, Lake County, and the City of Gary. U.S. Census Bureau.

⁴ [Indiana Minimum Wage 2022](#), Federal Department of Labor, 2022.

⁵ [United States Census Bureau, Quick Facts](#), for United States, Indiana, Lake County, and the City of Gary. U.S. Census Bureau.

⁶ [Community Health Needs Assessment, Community Health Care System, Lake and Porter Counties](#), Health Communities Institute (2022).

- According to the U.S. Bureau of Labor Statistics, in August 2022, the rate of unemployment in the City of Gary was 4.6%,⁷ compared to state unemployment rate of only 2.8%⁸ and a national unemployment rate as of September 2022 of 3.5%.⁹
- There are significant disparities by race/ethnicity in Lake County:
 - Black/African American communities are disproportionately affected by income gaps of \$30,000 or more in Lake County.¹⁰
 - The largest racial/ethnic group in Lake County who are living below the poverty level are those identifying as Black/African American at 28.1%,
- Females make up a larger percentage of the population who are living in poverty in Lake County (17.2%). Lake County's percentages are higher than the state of Indiana and the United States.¹¹
- In Lake County, 48.4% of renters and 20.1% of homeowners spend 30% of their income on rent/housing.¹²
- According to the City of Gary Consolidated Plan (p. 33), there are, 4,160 rental households earning at or lower than 30% AMI have one or more severe housing problems such as lacking a kitchen, complete plumbing, severely overcrowding, or severely cost burden.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Response: Extrapolated from the CoC PIT count, there were 23 survivors of domestic violence at the time of the 2022 point-in-time count. There are four shelters that serve survivors of domestic violence in Lake County: Gary Commission for Women, Haven House, The Caring Place, and St. Jude House.

Domestic violence is one of the leading causes of homelessness for women and their children. Although safe housing can provide a pathway to freedom, there are many barriers that prevent survivors from obtaining or maintaining safe and affordable housing. The majority of survivors experience financial abuse, meaning that they have not had access to the family finances, have been prohibited from working, or have had their credit scores destroyed by an abusive partner. Victims may also face discrimination in accessing or maintaining housing based on the violent or criminal actions of perpetrators. Additionally, victims are limited in the locations and types of housing they can access because of their unique safety and confidentiality needs, and many housing or homelessness assistance programs have barriers that inadvertently exclude victims of violence.

Human trafficking is also an issue in Indiana. National research indicates that many of the risk factors and vulnerabilities of human trafficking reflect circumstances faced by HOME-ARP qualifying populations, including caretaker substance use, involvement with the child welfare and/or foster care system, juvenile justice involvement, mental health concerns, runaway or homeless youth,

⁷ [City of Gary, Indiana, Economy at a Glance](#), U.S. Bureau of Labor Statistics (August 2022).

⁸ [State of Indiana, Economy at a Glance](#), U.S. Bureau of Labor Statistics (August 2022).

⁹ [The Employment Situation, United States](#), U.S. Bureau of Labor Statistics (September 2022).

¹⁰ [Community Health Needs Assessment, Community Health Care System, Lake and Porter Counties](#), Health Communities Institute (2022).

¹¹ [Community Health Needs Assessment, Community Health Care System, Lake and Porter Counties](#), Health Communities Institute (2022).

¹² [Community Health Needs Assessment, Community Health Care System, Lake and Porter Counties](#), Health Communities Institute (2022).

underemployment or unemployment, and unstable housing, among many others. Two of the top five risks/vulnerabilities for human trafficking are homelessness and unstable housing.

The majority of statistics about human trafficking are state level data. In 2016, the National Human Trafficking Hotline (NHTH) logged 317 contacts (through telephone, texts, online chats, emails and webforms) in Indiana concerning human trafficking. Of those, 19 contacts were from victims or survivors of human trafficking. From among the total contacts, 85 cases of human trafficking were reported.¹³

Only four years later, in 2020, the number of NHTH contacts had increased by more than 62% in Indiana. NHTH logged over 514 contacts concerning human trafficking. Of those, the percent of contacts from victims or survivors of trafficking was up almost 526% (with 119 contacts from victims or survivors). The number of actual reported cases logged at NHTH had increased over the four-year period by over 65% (with 140 cases of human trafficking reported in 2020).¹⁴

Of the 514 Indiana human trafficking cases reported in 2020, 82.8% involved sex trafficking. 29% (41 of 140) of the cases involved minors. By gender, 82% of the cases (115 of 140) involved female victims or survivors, while 15.7% involved male victims or survivors.

According to SAFE Coalition for Human Rights, based in Muncie Indiana, the northwest region is a hotbed for human trafficking based on its close proximity to Chicago.¹⁵ They state on their site that 16,000 – 25,000 women and children trafficked per year through the Midwest belt.

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability, as defined by HUD in the Notice

Response: CHAS data indicate that between 2015 and 2019 (the most recent available data), there were 31,515 households in Gary, Indiana.¹⁶ Of those households, roughly 11,525 (36.5%) had at least 1 of 4 housing problems. Households that had at least 1 of 4 *severe housing problems* comprised roughly 21.6% (6,830) of the households. 34.6% (10,920) percent of households were cost burdened (paying more than 30% of their income toward housing).¹⁷

Children and youth are a population that faces homelessness, yet they are not always eligible for homelessness services for the CoC and other funding streams. Local community partners shared that approximately 200 school-aged students in the 2021/2022 academic year were facing homelessness under the McKinney-Vento Act in the Gary Community School Corporation. That group includes students and their families who are couch surfing, doubled up, or in other unstable housing situations that are not considered “homelessness” under many of the other HUD programs, but they do fall under the “other special populations” definition for HOME-ARP purposes.

¹³ [Indiana Spotlight, 2016-2020](#), National Human Trafficking Hotline Statistics.

¹⁴ [Indiana Spotlight, 2016-2020](#), National Human Trafficking Hotline Statistics.

¹⁵ [“Human trafficking often goes underreported in Indiana, but ‘it is in our back yards, our schools and neighborhoods,’”](#) Chicago Tribune (August 30, 2020).

¹⁶ [Consolidated Plan/CHAS Data, Gary Indiana](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), 2015-2019.

¹⁷ [Consolidated Plan/CHAS Data, Gary Indiana](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), 2015-2019.

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Response:

- The most recent Lake County PIT count (2022) identified 272 people experiencing homelessness, 209 of whom were living in shelters and 63 who were living unsheltered on the streets, in vehicles, or encampments. There are no year-round shelters that are housing-focused, low-barrier that can serve the general population. The emergency shelters that do exist serve special populations only (e.g., people fleeing domestic violence or women and children only, single men only).
- Adults over 18 years old comprised 77% of Lake County’s homeless population in the 2022 PIT count. The two main shelters that can serve the most individuals are both open only to single males - the City Rescue Mission (36 beds) and My Brother’s Keeper (26 beds). Yet 36.5% of the unsheltered single adults identified as female in the most recent PIT count.
- Children and young adults comprised 23% of the homeless population as reported in the 2022 PIT count. There are more children experiencing homelessness, who are living doubled up or couch surfing, who are not eligible for HUD-funded services through the CoC.
- For those children who do meet the HUD requirement, almost 20% were living unsheltered during the most recent PIT count. Fifty-four children under 18 years were identified as living in shelters, while 9 were living unsheltered at the time of the 2022 PIT count.
- An additional number of young adults (aged between 18 and 24) also experienced homelessness, 12 living sheltered, 10 living unsheltered during the 2022 PIT count. There is no shelter that services transitional age youth. For young males over 13 not yet adult, there is no shelter that they can access alongside of their families.
- Only four shelters are open to households with children. Two of those are dedicated solely to households experiencing domestic violence.¹⁸
- There are altogether 88 beds available for households with children. More than 60% of those (55) are dedicated to households experiencing domestic violence.¹⁹
- Of the 22 units available for households with children, 50% (11) are dedicated to households experiencing domestic violence.²⁰
- There are no transitional housing beds in Lake County.²¹
- Permanent housing opportunities for people transitioning from the homeless system of care (from a shelter, RRH, or PSH) are difficult to find in Lake County, especially units where landlords or property managers are willing to accept vouchers.
- The majority of Lake County permanent supportive housing (PSH) beds available are for households without children (233 beds). Of those, 140 are dedicated to chronically homeless individuals and 74 are dedicated to Veterans.²²

¹⁸ [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

¹⁹ [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

²⁰ [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

²¹ [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

²² [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

- There are no PSH beds for youth in Lake County.²³
- There are 50 total PSH units for households with children, with 10 of the units reserved for Veteran households (VASH). There are only 40 PSH units for households with children in all of Lake County.²⁴
- There are limited rapid rehousing (RRH) beds in Lake County. There are only 10 units for households with children.²⁵
- There are only 44 total RRH beds, 35 for households with children and 9 beds for households without children.²⁶
- The unsheltered and sheltered homeless population in Lake County also suffer from mental health issues and/or substance abuse problems, which can hinder them from obtaining and retaining employment.
- They also tend to isolate themselves from the public, making it more challenging for provider outreach to make contact and assist individuals with case management.

At Risk of Homelessness as defined in 24 CFR 91.5

Response:

- In Gary, 33% of residents lived below the federal poverty level (compared to only 15.8% in Lake County and 12.2% in the state of Indiana). The median value of an owner-occupied home was \$68,400 and the median gross rent in the community from 2015-2019 was \$792/ month. Recent data from several different online sources indicate that has gone up more than \$100/month to \$897/month in 2022.²⁷
- Persons/families who are at 30% or below AMI are more likely to be affected by severe housing problems, are forced to live in places with substandard conditions, and are more susceptible to falling into experiencing homelessness. According to 2015-2019 CHAS data, there are 9,170 households that have incomes between 0 and 30% of the area median income (AMI)— indicating that a substantial portion of the population could be considered at-risk of homelessness based on income alone.²⁸
- For people to be able to afford local rent and contribute 30% or less of their household income toward housing, they would need to earn at least \$2,417 per household/month. Earning an annual income of \$29,000 necessitates earning more than \$14/hour wage. Currently, the minimum wage in Indiana for 2022 is \$7.25/hour.²⁹ Minimum wage would have to increase by almost 100% for households earning minimum wage to afford local median rent.
- Many formerly homeless and rapid re-housing assistance recipients live from paycheck to paycheck and often need more than twelve months of supportive services and financial assistance to secure decent safe housing that can remain affordable to them. Rent and utility assistance continue to be needed by low-income residents of Gary.

²³ [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

²⁴ [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

²⁵ [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

²⁶ [Housing Inventory Count, Region 1A, Balance of State Indiana](#), 2022.

²⁷ [RentCafe Gary, Indiana rental market](#) or [Point 2 Average Apartment Rent in August 2022](#). Both accessed on October 17, 2022.

²⁸ [Consolidated Plan/CHAS Data, Gary Indiana](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), 2015-2019.

²⁹ [Indiana Minimum Wage 2022](#), Federal Department of Labor, 2022.

- The lack of health insurance can be a key determinant of health status and housing instability along with inconsistent access to health care, which often results in illness, longer hospitalizations, and increased vulnerability to mental health conditions. In the most recent U.S. Census report for City of Gary, more than more than 1 in 10 (11.8%) of the total population reported having no health insurance.³⁰
- The City of Gary has approximately 12.6% of its residents with disabilities – experiencing difficulties with hearing, vision, cognitive, ambulatory, self-care, and independent living. The City of Gary also has an aging population with close to 2 in 10 (20%) residents who are over the age of 65 who may have issues with mobility, hearing, vision, self-care and independent living, making it harder to maintain affordable housing. Low-income, elderly, and residents with a disability need more affordable, suitable housing to choose from. There are many elderly individuals and individuals with a disability who have fixed incomes that are not able to make ends meet. Many older adults do not have the resources for home repairs and are forced to live in sub-standard housing.
- According to HUD, the housing market in Gary Indiana is considered “tight.” In April 2021, HUD noted that there was a low inventory of homes for sale and a 14% increase in the average home sales price during the most recent 12 months (marked at \$226,900) indicated tight market conditions.³¹ In 2021, there was less than a 1% vacancy rate in the City.³²
- HUD data from 2021 also indicated that market rate apartment construction has been limited since 2018 and properties that were recently completed have vacancy rates below 3%.³³
- As for the age of housing in Gary, HUD reports that rental units are older than rental units in other parts of the country. The median age for a home in Gary Indiana was over 50 years old, with 1970 being the median year Gary homes were built.³⁴ The age of Gary homes signifies a great need for rehabilitation of the aging housing stock that have code violations and/or lead based paint hazards.
- Because of the aging housing stock, lead-based paint and lead poisoning has been a great concern throughout the state of Indiana. A recent report by the Indiana Advisory Committee to the U.S. Commission on Civil Rights examined the civil rights issues related to indoor and outdoor lead exposure in the state from an environmental justice perspective.³⁵ The report looked at lead poisoning in Lake County’s West Calumet Housing complex where an investigation into lead paint exposure took place and households were relocated.
 - Testimony to the Advisory Committee reported that Black and Hispanic children have higher rates of lead poisoning than white children, even when accounting for socioeconomic status. Evidence also supported that national origin also results in

³⁰ [United States Census Bureau, Quick Facts](#), for United States, Indiana, Lake County, and the City of Gary. U.S. Census Bureau.

³¹ [Comprehensive Housing Market Analysis for Gary, IN](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), April 2021.

³² [Comprehensive Housing Market Analysis for Gary, IN](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), April 2021.

³³ [Comprehensive Housing Market Analysis for Gary, IN](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), April 2021.

³⁴ [Comprehensive Housing Market Analysis for Gary, IN](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), April 2021.

³⁵ [Environmental Injustice: Lead Poisoning in Indiana. A Report of the Indiana Advisory Committee to the U.S. Commission on Civil Rights](#), November 2020.

disparities when it comes to lead poisoning, particularly for refugees, immigrants, and Native Americans.³⁶

- The primary source of childhood lead exposure is living in their own homes.³⁷
- The limitations of the local transportation system and impact the ability for people at risk of homelessness to retain employment and stable housing. For people at risk of homelessness, stable employment may be located outside the transportation systems reach and/or buses do not run during their evening or weekend working shifts. For families working late night shifts, they are often forced to resort to taking Ubers back home which are increasingly cost prohibitive for households that are already cost burdened and only earning minimum wage.

Fleeing, or Attempting to Flee, Domestic Violence, Dating Violence, Sexual Assault, Stalking, or Human Trafficking, as defined by HUD in the Notice

Response:

- There are four shelters in Lake County that serve people experiencing domestic violence. Two of them participate in HMIS and report data in the Housing Inventory County (St. Jude House and Haven House Hammond).
- Of the two that report in the HIC, they offer 11 units and 51 total beds for households with children and a few additional beds (6) for households without children (though not dedicated solely for domestic violence survivors).
- There were 23 adult individuals in Lake County during the 2022 PIT count, who were receiving shelter who had experienced domestic violence. That number almost doubled from the 2021 PIT count, where only 12 adult survivors of domestic violence were counted in the PIT.
- The barriers to obtaining housing stability for the individuals and families the shelters serve include limited affordable housing, limited housing subsidies, challenging landlords, reduced shelter capacity, and lack of resources in surrounding communities.
- The state of Indiana saw a 181% increase in domestic violence related homicides between July 2020 and June 2021. The Indiana Coalition Against Domestic Violence attributes the increase to unemployment, underemployment, isolation, alcohol consumption and greater access to firearms. In addition, 911 call centers reported up to an 87% increase in domestic violence calls and specifically high call rates in zip codes that were disproportionately impacted by COVID-19.³⁸
- The Indiana Coalition Against Domestic Violence conducted a statewide survey of communities across the state to help develop prevention strategies. Of the 219 respondents, 90% agreed that “structural racism/oppression,” “other people’s unconscious/implicit biases,” “mental exhaustion/constant pressure” were the primary barriers to health, safety, and wellness.³⁹
- “Of the top 10 barriers to wellness identified by survey respondents, five of them related to anti-Black racism directly, three of them were concerning mental health, and the other two identified were financial stress and the lack of representation of Black women in leadership positions, which can also be linked to anti-black racism.”⁴⁰

³⁶ [Environmental Injustice: Lead Poisoning in Indiana, A Report of the Indiana Advisory Committee to the U.S. Commission on Civil Rights](#), November 2020.

³⁷ [Environmental Injustice: Lead Poisoning in Indiana, A Report of the Indiana Advisory Committee to the U.S. Commission on Civil Rights](#), November 2020.

³⁸ [Annual Report](#), Indiana Coalition Against Domestic Violence, July 1, 2020 to June 30, 2021.

³⁹ [Annual Report](#), Indiana Coalition Against Domestic Violence, July 1, 2020 to June 30, 2021.

⁴⁰ [Annual Report](#), Indiana Coalition Against Domestic Violence, July 1, 2020 to June 30, 2021.

- The Indiana Coalition Against Domestic Violence has a flexible financial assistance program. The program has existed for decades. The demands on the program increased during COVID. In 2020-2021, they were able to provide housing assistance, utility assistance, transportation and relocation assistance, food security, child care, and other financial assistance to over 344 survivors and their children statewide.⁴¹

Other populations requiring services or housing assistance to prevent homelessness and other populations at greatest risk of housing instability as defined by HUD in the Notice

Response:

- According to a Community Health Needs Assessment conducted in 2020 by Northwest Indiana Community Action focused on NW Indiana residents across 4 counties, including Lake County, 57% of people they surveyed in 2020 reported that they were BEHIND on paying back debt.⁴²
- Eighty percent of those same survey respondents reported that they did not have emergency savings. Of the 9% who reported that they did have emergency savings, the median amount saved was \$1,000. Additionally, 38% said they could not afford to buy more food.⁴³
- Across all 4 counties, over 30,000 children were living in poverty in 2018, with 27% of Lake County's children living in poverty.⁴⁴
- Northwest Community Action also reported on well-being assessments that were conducted by the State's Family and Social Services Administration. For NW Indiana, over 32,000 well-being assessments were completed for the region. Amongst the top challenges for those 32,000 households at the time of the survey were the following:
 - 47% did not have enough money for food in the past 12 months
 - 36% were actively seeking work in the past 4 weeks
 - 32% had had utilities shut-off in the past 12 months
 - 25% were afraid they would not have stable housing in the next 2 months.⁴⁵
- For survey respondents who had trouble renting, the reasons included not having money for a security deposit (69%), having bad credit (54%), all the places they could afford were unsafe, unhealthy, or too small (38%), or they were not sure how/where to look (20%).⁴⁶
- Housing costs can be a significant factor in housing instability and risk of homelessness. The more a household spends on their housing, the less income is left for other necessities. Sixty-nine percent of the 10,495 low-income renter households in the City of Gary who allocated more than half their income to housing costs, had incomes below 30% of AMI.⁴⁷ Having such limited flexibility with how income can be spent, means making tough decisions on what does and ultimately does not get paid month to month. Missed payments are easy to accumulate and can significantly damage credit histories, further perpetuating a vicious cycle of housing loss and substandard housing options that is challenging to break free from. Once housing is lost, it is increasingly difficult for a family to get back on track.

⁴¹ [Annual Report](#), Indiana Coalition Against Domestic Violence, July 1, 2020 to June 30, 2021.

⁴² [Northwest Indiana Community Action, 2020 Community Needs Assessment](#),

⁴³ [Northwest Indiana Community Action, 2020 Community Needs Assessment](#),

⁴⁴ [Northwest Indiana Community Action, 2020 Community Needs Assessment](#),

⁴⁵ [Northwest Indiana Community Action, 2020 Community Needs Assessment](#),

⁴⁶ [Northwest Indiana Community Action, 2020 Community Needs Assessment](#),

⁴⁷ [Consolidated Plan/CHAS Data, Gary Indiana](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), 2015-2019.

- According to HUD, households spending more than 30% of their income on housing are referred to as “cost burdened” and owners and renters who pay more than 50% of their income for housing are referred to as “severely cost burdened.” Having such limited disposable income remaining after paying for housing costs leaves households at an increased risk of housing instability and homelessness. For renters, housing costs include rent paid by the tenant, plus utilities and for owners, housing costs can include mortgage payment, taxes, insurance, and utilities. Housing problems that can serve as key indicators of at-risk households include overcrowding and lack of proper kitchen and plumbing facilities.
- Persons/families who are at 30% or below AMI are more likely to be affected by severe housing problems, are forced to live in places with substandard conditions, and are more susceptible to experience housing instability and fall into homelessness.⁴⁸
- Relatively lower educational attainment can make it more challenging to secure living wage employment. In Gary, adults are slightly less likely to have a high school education than compared to the national average (85.2% compared to the national average of 88.5%), and Gary residents are significantly less likely to have a four-year college education (13.5% of Gary residents compared to 32.9% nationally).⁴⁹ There is a need for job skills training and assistance in applying for and attending diploma/GED programs, vocational school, certificate programs and higher education.
- Workforce reductions and layoffs make income streams inconsistent, which can lead to further housing instability. According to the U.S. Bureau of Labor Statistics, in August 2022, the rate of unemployment in the City of Gary was 4.6%,⁵⁰ compared to state unemployment rate of only 2.8%⁵¹ and a national unemployment rate as of September 2022 of 3.5%.⁵² The uncertainties of how to meet financial obligations and a loss of benefits that come with unemployment, can put a strain on families as members grapple with how to make ends meet in the interim and whether they can afford to remain in their community or will be forced to move and seek employment elsewhere.

⁴⁸ [Consolidated Plan/CHAS Data, Gary Indiana](#), Office of Policy Development & Research, Department of Housing and Urban Development (HUD), 2015-2019.

⁴⁹ [United States Census Bureau, Quick Facts](#), for United States, Indiana, Lake County, and the City of Gary. U.S. Census Bureau.

⁵⁰ [City of Gary, Indiana, Economy at a Glance](#), U.S. Bureau of Labor Statistics (August 2022).

⁵¹ [State of Indiana, Economy at a Glance](#), U.S. Bureau of Labor Statistics (August 2022).

⁵² [The Employment Situation, United States](#), U.S. Bureau of Labor Statistics (September 2022).

Identify any gaps within the current shelter and housing inventory as well as the service delivery system:

Response: The following gaps within the current shelter and housing inventory as well as the service delivery system were identified through analysis of stakeholder input, the 2022 Point in Time Count, the 2022 Housing Inventory Chart (described above), the 2021-2025 City of Gary Consolidated Plan and the HUD 2021 Comprehensive Housing Market Analysis for Gary, IN:

Shelter:

- There is a need for a low-barrier, housing-focused non-congregate shelter in the City of Gary.
- Shelters are over-capacity for households without children.
- The high number of persons in households without children who have experienced unsheltered homelessness and the low occupancy of shelter units for households without children suggests that current shelter resources are not aligning with need.
- The two main shelters that can serve the most individuals are both open only to single males yet 36.5% of the unsheltered single adults identified as female in the most recent PIT count.
- There is no shelter that services transitional age youth (18-24 years old).
- For young males over 13 not yet adult, there is no shelter that they can access alongside of their families.
- Only four shelters are open to households with children. Two of those are dedicated solely to households experiencing domestic violence.
- Current shelters require rehabilitation and repair.
- “During the COVID-19 Pandemic, it was reported that many of the single individuals have become homeless due to loss of jobs and require housing assistance that is beyond the capacity of the City or shelter providers.” (2021-2025 City of Gary Consolidated Plan, p. 35).

Housing:

- There are not enough affordable rental housing units in the area, the costs to rent the units that are available in the area is high compared to local income, and many of the housing units that are available for qualifying populations is sub-standard, with households overcrowded and/or cost burdened. Both renter and owner-occupied households are most likely to report problems with high housing costs.
- Many of Gary’s affordable units are dilapidated, unsafe, and substandard options. Stakeholders throughout the community shared that replacement of dilapidated housing with quality housing is a necessity in Gary.
- Need more deeply subsidized, affordable housing, particularly housing that meets the needs of people with complicated rental histories or a disability that may result in them being perceived as high risk.
- Need additional permanent supportive housing.
- The HUD 2021 Comprehensive Housing Market Analysis for Gary, IN identified additional needs, including:
 - During the 3-year forecast period, demand is expected for an additional 570 rental units.

- Despite the large number of vacant units, most are in disrepair and the cost to repair exceeds any potential profit from renting the units. No measurable portion of other vacant homes are expected to return to the market to meet forecast demand.
- The 2021-2025 City of Gary Consolidated Plan identifies additional needs, including:
 - The high cost of maintenance of homes and quality of housing are perhaps some of the major factors influencing risk of homelessness in the city (p. 37)
 - The need for assisted housing in Gary exceeds by far the number of available units. The Gary Housing Authority's current waiting list consist of 4,844 applicants for public housing units. Almost 97% of the individuals on the waiting list are extremely low-income families, with more than 58% of them are families with children. (p. 47)
 - The Gary Housing Authority also reports their Voucher Assistance program is closed. The Authority's turn over for Section 8 Voucher is very limited while the number of applicants on the waiting list exceeds 4,425. (p. 47)
 - According to Gary Housing Authority, among the units desired, the most needed unit type is one-bedroom units. The second largest need appear to be family units of 2- and 3-bedroom capacity. (p. 47)
 - Few affordable rental units available for individuals or small households (only 2% of all affordable rental units are 0-bedroom; only 16% are 1-bedroom units) (p. 68).
 - According to HUD's multifamily information for housing units with Section 8 and other assisted units, seven developments, that will have expiring contract during 2021-2025. These developments collectively provide 731 assisted units of housing. (p. 69)
 - There are very few affordable housing units that low and very low-income households can afford. This has put pressure on conversion of many single-family homes into rental units with multiple families residing in each unit. (p. 74)

Service delivery:

- Lack of sufficient number of case managers to fulfill the community needs.
- Lack of childcare throughout the city.
- Inadequate transportation resources to reach employment, education, social service, and other opportunities.
- Lack of pharmacy and grocery resources within the city.
- Need for more legal services to help people with sub-standard housing and eviction prevention.
- Need additional housing navigation and case management services to encourage more landlords to participate in voucher or rental assistance programs, connect tenants to resources, and help tenants secure needed housing.
- Need comprehensive, coordinated, consistent, community-driven supportive services throughout the city.
- Need for more housing navigation (housing search and counseling), employment assistance, and educational services.
- The 2021-2025 City of Gary Consolidated Plan identifies additional needs, including:
 - In conversation with shelter and service providers, a variety of services are expressed as needed within organizations to provide temporary to 24-hour services to persons with physical, mental and/or emotional impairments. Housing services may include helping special needs populations to find and maintain affordable rental/homeownership

housing. In addition, there is a need or transitional housing with services, and permanent housing with or without case management and other services. (p. 62)

- A high priority needs exists for public services improvements and accessibility to public services was identified through consultation and community input. There exists a gap in the services available within Gary to address the needs of the residents effectively and comprehensively. (p. 113)
- One area that gaps may exist is a well-coordinated homeless delivery services at the County level. A second area of concern is the stronger outreach for employment and skill training. The third and perhaps the most important gap in Gary’s institutional delivery system relate primarily to funding. The reduction in federal funding for the CDBG, HOME, and ESG programs has resulted in a strain on the ability of the City to effectively administer these programs. Additionally, the reduction in federal funding ultimately impacts the nonprofit service providers reliant upon those funds to serve their target populations. The current economic climate also limits the amount of private funding sources available to nonprofit service providers. (p. 127)

Under Section IV.4.2.ii.G of the HOME-ARP Notice, a PJ may provide additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan. These characteristics will further refine the definition of “other populations” that are “At Greatest Risk of Housing Instability,” as established in the HOME-ARP Notice. If including these characteristics, identify them here:

Response: The City will not utilize additional characteristics associated with instability and increased risk of homelessness in their HOME-ARP allocation plan.

Identify priority needs for qualifying populations:

Response: The priority needs for qualifying populations in the City of Gary are as follows:

- 1. Increased access to housing**
- 2. At least one new low-barrier, housing-focused, non-congregate shelter in the City of Gary for all qualifying populations, including single adults**
- 3. Increased availability and scope of supportive services**

Increased access to housing

The ultimate need in any effort to reduce homelessness and housing instability is to increase access to housing. While there has been great emphasis in this CoC on matching individuals to housing, CoC providers report that it is difficult to find units that are affordable and accessible for people exiting homelessness. Specifically, members of the Gaps Committee indicated that there are increasing numbers of instances where landlords have expressed an unwillingness to continue to rent to people transitioning out of homelessness. Other community members note that locating affordable, safe housing is a challenge for the other priority populations as well. They reported that housing units are unaffordable, or in poor condition.

One effort already underway to respond to this challenge is a local service provider's plans to create a tiny house village with on-site services for people who need extra support to maintain housing. Also, several providers are providing life skills classes to support individuals in understanding their rights and responsibilities as renters. The Public Housing Authority obtained Mainstream Vouchers which can support non-elderly disabled people, including people experiencing homelessness and at risk of homelessness, to obtain housing.

At least one new low-barrier, housing-focused, non-congregate shelter in the City of Gary for all qualifying populations, including single adults

Currently in the City of Gary, there is no place that provides year-round shelter and services to people experiencing homelessness. There is a small shelter that serves families with children and another that provides shelter to people fleeing domestic violence, sexual assault, dating violence, and human trafficking.

Without a safe place for the general population of people experiencing homelessness to go for shelter, they end up staying in places not meant for human habitation. The winter weather shelter provides support, but only for a limited number of months during the year. The lack of a low-barrier, housing-focused shelter means not only are people sleeping and living in unsafe situations, but it also makes it extremely difficult to locate people to provide them the case management and supportive services they need to obtain and retain stable housing.

Increased availability and scope of supportive services

In addition to housing and shelter, resources are needed to support and increase case management services in Gary. Not only would increase resources bring in more case managers, but they could be used to provide training to all community case managers about trauma-informed care, prevention and diversion, and other best practices.

Supportive services are also needed to improve access to behavioral health resources for qualifying populations, which would entail funding and staff to create additional dedicated behavioral health resources for qualifying populations across the City. In addition, resources could ensure that access to services are better coordinated amongst the local providers for people with mental health and substance use disorders.

With the ability to provide supportive services to households with children who are deemed "homeless" under the McKinney-Vento definition (those households couch surfing or doubled up), HOME-ARP supportive services could support efforts to connect with the local schools, working directly with school counselors and McKinney-Vento liaisons to provide services to those students and young adults. Partner with schools' McKinney-Vento Liaisons and school counselors to ensure all are aware of system resources.

Additional supportive services resources should be prioritized for expanding transportation in the area. Many households in the qualifying populations struggle to get to and from work outside of local public transportation hours. Still others would like to work or go to school in parts of the area where the local bus system does not travel.

Explain how the PJ determined the level of need and gaps in the PJ's shelter and housing inventory and service delivery systems based on the data presented in the plan:

Response: The City of Gary continues to work diligently with community partners to address the needs of individuals and families who are homeless, at risk of homelessness, and other vulnerable populations.

The City has leveraged the work of the CoC and its gaps analyses in 2020 and 2021. The CoC's processes included review of shelter and housing, outcomes, trends in performance, and qualitative input. This input included surveys of people with lived experience of homelessness (designed and analyzed by people with lived experience of homelessness), focus groups of providers, and surveys of the whole CoC membership. The resulting 2021 and 2022 CoC Action Plans identified the CoC's key priorities for action by the community and a group of community leaders referred to "Planning for the Future" has been working to address the CoC's highest priorities. While the lack of a functioning, stable shelter for individuals has captured the community's attention, especially during the pandemic period, the need for increased access to housing units and need for additional supportive services to maintain housing stability has been the primary focus in both Action Plans.

Providers shared their struggles with helping people stabilize in housing due to funding limitations and limited supportive services funding. Providers also reported that landlords have become more resistant to taking housing vouchers because of their experience with people using vouchers without sufficient support. People with lived experience reported their greatest need was to access to housing.

HOME-ARP Activities

Describe the method(s) that will be used for soliciting applications for funding and/or selecting developers, service providers, subrecipients and/or contractors:

Response: The City proposes to focus the majority of the acquired HOME-ARP funding on the Production and Preservation of Affordable Housing and funding the infrastructure to build, rehabilitate, or renovate a non-congregate shelter, with a small amount toward Supportive Services. The opportunity presented by this allocation of HOME-ARP to make the sizable investment to fulfill a long-term solution (affordable housing) and strengthen an important safety net (non-congregate shelter) is vital to strengthening the community's homeless system of care.

The City of Gary will administer the HOME-ARP allocation and oversee all projects to completion. Since it is unclear at the time of writing this Allocation Plan whether there are any community partners who would be able to obtain funding to operate a non-congregate shelter, we hope to be flexible in the Allocation Plan to reallocate funding dedicated to a non-congregate shelter and reallocate those funds toward affordable housing, if no organization or agency can provide assurances, they have the ability to fund the operations of a shelter. As such, our plan is to solicit a Request for Information (RFI) to determine the interest in the community to operate a non-congregate shelter. We will then evaluate the RFI to determine if there are any possibilities for collaboration or coordination between interested parties. Ultimately, the City plans to issue a local Notice of Funding Opportunity, with a notice of intent that accepts projects for affordable housing and/or non-congregate shelter, encouraging proposals that

combine both in one building/project. If there are no proposals for non-congregate shelter, the City would have the flexibility to reallocate the shelter funds and apply them toward affordable rental housing production or preservation.

Once the funding decisions are made about affordable rental housing and non-congregate shelter, the City will issue a second NOFO to address supportive services.

The method and process we intend to use for solicitation and selection of projects for funding is as follows:

- The City will issue a Request for Information, soliciting interest from community and agency partners to create, renovate, or rehabilitate a building for either a non-congregate shelter, affordable rental housing units, or both.
- The City will evaluate the responses to determine if there is sufficient interest to issue a NOFO, as well as determine if there are opportunities to encourage collaboration or partnerships across proposals.
- The City will issue the first Notice of Funding Opportunity (NOFO), soliciting applications for funding for producing or preserving affordable housing in Gary and to build, rehabilitate, or renovate a non-congregate shelter, or to propose a combined project.
- We will issue the NOFO and request that applicants inform the City of their intent to apply within 20 days of the NOFO issuance, including information about whether they will be applying for producing/preserving affordable rental housing, non-congregate shelter, or both.
- Applicants will be provided an additional 40 days (for a total of 60 days) to submit their full application/s for funding.
- If applicants have questions or wish to discuss their plans in advance of submission, the City of Gary will make staff available to answer any questions.
- The City will be explicit in the solicitation with any other conditions that the City will require in order to receive funding.
- The second NOFO, for Supportive Services, will occur after the first round of allocations are awarded. The City will identify in the solicitation specific Supportive Services that HOME-ARP funding can be used for that will address the gaps identified in the needs assessment and gaps analysis. If there is new updated data to help inform the City about which services to prioritize, the NOFO may reflect that new data.

The City will publicly announce the projects that were awarded HOME-ARP funding on its website and through other social media.

Describe whether the PJ will administer eligible activities directly:

Response: There is currently no plan for the City to administer eligible activities directly.

If any portion of the PJ's HOME-ARP administrative funds are provided to a subrecipient or contractor prior to HUD's acceptance of the HOME-ARP allocation plan because the subrecipient or contractor is responsible for the administration of the PJ's entire HOME-ARP grant, identify the subrecipient or contractor and describe its role and responsibilities in administering all of the PJ's HOME-ARP program:

Response: No portion of the administrative funding was distributed to a contractor or subrecipient prior to HUD’s approval of the Allocation Plan.

In accordance with Section V.C.2. of the Notice (page 4), PJs must indicate the amount of HOME-ARP funding that is planned for each eligible HOME-ARP activity type and demonstrate that any planned funding for nonprofit organization operating assistance, nonprofit capacity building, and administrative costs is within HOME-ARP limits.

Use of HOME-ARP Funding

| | Funding Amount | Percent of the Grant | Statutory Limit |
|--|----------------|----------------------|-----------------|
| Supportive Services | \$ 360,000 | | |
| Acquisition and Development of Non-Congregate Shelters | \$ 650,000 | | |
| Tenant-based Rental Assistance (TBRA) | \$0.00 | | |
| Development of Affordable Rental Housing | \$ 1,000,000 | | |
| Nonprofit Operating | \$0.00 | 0% | 5% |
| Nonprofit Capacity Building | \$120,000 | 4.8% | 5% |
| Administration & Planning | \$ 360,094 | 14.4% | 15% |
| Total HOME-ARP Allocation | \$ 2,490,094 | | |

Describe how the PJ will distribute HOME-ARP funds in accordance with its priority needs identified in its needs assessment and gap analysis:

Response: The City of Gary has limited rental housing. Many of the affordable rental housing units that do exist are old and need updating. According to stakeholder feedback, any landlords or property managers would prefer to rent sub-standard housing to low-income people who are willing to rent, rather than invest in the units to bring them up to code or to update them to be more accessible and eligible to receive housing assistance. Of the units that do come on the market and are available for rent to qualifying populations, there are insufficient numbers of the size needed for people on the verge of homelessness. The city lacks studio units or one-bedroom units. Throughout the consultation process that Homebase conducted on behalf of the City of Gary, most organizations specifically highlighted the need for more affordable, quality housing and the services needed to maintain them.

The City of Gary proposes to use HOME-ARP funds to acquire land for, construct, or rehabilitate existing housing for at least 7 units of affordable housing. With the unprecedented resources offered by HOME-ARP to support infrastructure to increase available affordable housing in the community, the City of Gary believes that community organizations and local developers who are familiar with the challenges and needs of HOME-ARP qualifying populations will be well-placed to propose projects that can receive and utilize HOME-ARP funds. This will help to address the gap caused by private landlords who are

unwilling to rent to these populations. It will also give some HOME-ARP eligible households the opportunity to rent housing that is safe and affordable.

Additionally, the City of Gary needs at least one shelter that is low-barrier and housing-focused that accepts people regardless of their household status, age, gender, race/ethnicity, sexual preference and without conditions of participation. Throughout the consultation process that Homebase conducted on behalf of the City of Gary, most organizations specifically mentioned the lack of a low-barrier, housing-focused shelter in the community. They shared that the existing shelters are limited to special populations; that there is no place for single adults, youth, or adult-only families to shelter in the entire City. They expressed concern, however, that it would be challenging to stand up a new emergency shelter under current conditions where there is no funding to operate such a shelter.

Gary proposes to use HOME-ARP funds to acquire land, construct, and/or rehabilitate an already existing space (such as a motel/hotel, or other building) for one low-barrier, housing-focused non-congregate shelter to respond to a key need that HOME-ARP could address. While multiple shelters have been stood up in the past few years, they closed to lack of operation funding and currently no funding for standing up a shelter has been identified. We recognize that even with HOME-ARP funding, it may be difficult to establish a non-congregate emergency shelter due to the dearth of available resources available locally to commit to operating a shelter. If through the process the City is unable to get assurances that operational funds exist to secure a shelter for the minimum period required under HOME-ARP, the city intends to reallocate the HOME-ARP funds to increase the dollars available for permanent affordable rental housing.

Lastly, the City will dedicate \$250,000 toward housing-related supportive services that can fill a key gap in the community. The current staffing for supportive services that enable households to retain stable housing are lacking. HOME-ARP funds will be dedicated to supportive services that are focused on providing the assistance households need to obtain housing and avoid evictions and/or returns to homelessness.

Describe how the characteristics of the shelter and housing inventory, service delivery system, and the needs identified in the gap analysis provided a rationale for the plan to fund eligible activities:

Response: The gaps analysis reflected Gary has insufficient housing and housing resources, limited access to supportive services, and unstable crisis services. The community's recent homeless needs assessments and action plans, as well as the interviews and surveys completed as part of the HOME-ARP process reflected the same findings that these three gaps are impeding the community's response to housing instability.

HOME-ARP is a one-time opportunity to respond to these gaps. Of the opportunities to use the funding, paired with other community resources, the best use of the funds is to focus on developing affordable rental housing and the services to help people maintain their housing. The community has several sources of funding of tenant-based rental assistance including HCV, CoC, EHV, ESG, state funding, and Mainstream Vouchers.

Community service providers have time and again bumped up against the challenge that even with the tenant-based rental assistance that is available in Gary, there is a dearth of affordable housing units in

the area (sadly, some of the rental assistance available cannot be efficiently used because people with vouchers struggle to find units to use them in). The lack of affordable housing not only impacts people experiencing or at risk of homelessness, but also people fleeing domestic violence and other populations that experience housing instability.

The limited resources the community has had in recent years has made it challenging, if not impossible, to address the lack of affordable housing in Gary. Yet each year through our planning processes, the community recognizes that there is insufficient housing for the people who need it most.

Investing HOME-ARP funds to address this long-standing community issue is vital moving forward. Additional housing units will help meet community needs going forward. The new affordable housing units created with HOME-ARP fund will be places to use the tenant-based rental assistance dollars that are already available in our community.

Moreover, limited access to supportive services has created barriers to housing for many populations. Limited supportive services availability has resulted in people cycling in and out of housing and created further trauma, caused inefficiencies in the system of care, and damaged landlord relationships. The Allocation Plan will focus on providing case management and other supportive services to households who are able to access affordable housing to ensure that tenants are well equipped to retain their housing over the long-term. With more individuals and families in our community able to access stable and affordable housing, the annual funds coming into our community can be leveraged to help the most vulnerable in the qualifying populations.

HOME-ARP Production Housing Goals

Estimate the number of affordable rental housing units for qualifying populations that the PJ will produce or support with its HOME-ARP allocation:

Response: The City of Gary will provide at least 20 units of affordable housing through new construction, renovation, or rehabilitation. The HOME-ARP units will be made available to the qualifying populations that exist in our community.

Describe the specific affordable rental housing production goal that the PJ hopes to achieve and describe how the production goal will address the PJ's priority needs:

Response: The goal for the City of Gary is to increase affordable rental housing, specifically smaller units, such as studios and one-bedroom apartments. The HOME-ARP funds will be used to create affordable rental housing with 100% of the units made available to households from the HOME-ARP qualifying populations. The City will maximize the funding from HOME-ARP to support new construction, renovation or rehabilitation, whichever will add the most units as possible into the community. Through the RFI and RFP process, we will encourage efficiencies, asking potential partners and developers to leverage other resources that may be available from city, county, state, federal, or private funding streams to best meet the needs of qualifying populations.

Throughout the stakeholder engagement process, stakeholders made it very clear that there is a need for more affordable housing in Gary. People mentioned the lack of units available, the substandard

condition of some of the units that are being rented currently, the number of abandoned buildings, and the recent closing of facilities that support qualifying populations.

Stakeholders also identified the insufficient number of small units available for people to rent in the City. Given the limited resources available from HOME-ARP and the need for smaller units, the City will leverage the HOME-ARP funds for smaller units, enabling a greater quantity of new affordable housing to come online in the City.

Preferences, Referral Methods, and Limitations

A preference provides a priority for the selection of applicants who fall into a specific QP or category (e.g., elderly or persons with disabilities) within a QP (i.e., subpopulation) to receive assistance. A *preference* permits an eligible applicant that qualifies for a PJ-adopted preference to be selected for HOME-ARP assistance before another eligible applicant that does not qualify for a preference. A *method of prioritization* is the process by which a PJ determines how two or more eligible applicants qualifying for the same or different preferences are selected for HOME-ARP assistance. For example, in a project with a preference for chronically homeless, all eligible QP applicants are selected in chronological order for a HOME-ARP rental project except that eligible QP applicants that qualify for the preference of chronically homeless are selected for occupancy based on length of time they have been homeless before eligible QP applicants who do not qualify for the preference of chronically homeless.

Identify whether the PJ intends to give preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project:

Response: The City of Gary is not proposing at this time to establish a preference.

If a preference was identified, explain how the use of a preference or method of prioritization will address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Response: No preference has been identified.

Referral Methods

Identify the referral methods that the PJ intends to use for its HOME-ARP projects and activities. PJ's may use multiple referral methods in its HOME-ARP program. (Optional):

Response: No preferences are established in this plan and coordinated entry will not be used for referrals. Applicants in the Qualifying Populations will be selected from a waiting list in chronological order.

If the PJ intends to use the coordinated entry (CE) process established by the CoC, describe whether all qualifying populations eligible for a project or activity will be included in the CE process, or the method by which all qualifying populations eligible for the project or activity will be covered. (Optional):

N/A

If the PJ intends to use the CE process established by the CoC, describe the method of prioritization to be used by the CE. (Optional):

N/A

Describe whether the PJ intends to limit eligibility for a HOME-ARP rental housing or NCS project to a particular qualifying population or specific subpopulation of a qualifying population identified in section IV.A of the Notice:

Response: The City of Gary will not limit eligibility of HOME-ARP project to a particular qualifying population.

If a PJ intends to implement a limitation, explain why the use of a limitation is necessary to address the unmet need or gap in benefits and services received by individuals and families in the qualifying population or subpopulation of qualifying population, consistent with the PJ's needs assessment and gap analysis:

Response: The City of Gary will not implement a limitation.

If a limitation was identified, describe how the PJ will address the unmet needs or gaps in benefits and services of the other qualifying populations that are not included in the limitation through the use of HOME-ARP funds (i.e., through another of the PJ's HOME-ARP projects or activities):

Response: No limitation was identified for the City of Gary's Allocation Plan.

HOME-ARP Refinancing Guidelines

Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity

Response: The City of Gary will not be allocating funding to refinancing of existing debt.

Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.

Response: The City of Gary will not be allocating funding to refinancing of existing debt.

State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.

Response: The City of Gary will not be allocating funding to refinancing of existing debt.

Specify the required compliance period, whether it is the minimum 15 years or longer.

Response: The City of Gary will not be allocating funding to refinancing of existing debt.

State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

Response: The City of Gary will not be allocating funding to refinancing of existing debt.

Other requirements in the PJ's guidelines, if applicable:

Response: The City of Gary will not be allocating funding to refinancing of existing debt.