



City of Gary
Department of Community Development

SUMMARY



2023 Annual Action Plan

City of Gary

August 2023

Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The 2023 Annual Action Plan describes activities which will be undertaken by the City of Gary for the program year beginning January 1, 2023. The City will use funds granted by the U.S. Department of Housing and Urban Development (HUD) under the Community Development Block Grant (CDBG), Home Investment Partnerships Program (HOME) and Emergency Solutions Grant (ESG) programs.

The City of Gary began preparing its five-year Consolidated Plan in 2020. This plan was submitted to HUD and approved in 2021. The 2023 Action Plan is the third-year implementation of this five-year plan. The 2023 Annual Action Plan details the activities the City of Gary will undertake to address housing, homeless and community development needs and local objectives using CDBG, HOME and ESG funds. Programs and activities funded in the Plan intend to primarily benefit low- and moderate-income residents of the City of Gary. The activities that are funded meet the objectives established by the Consolidated Plan and support its priorities. The City's Department of Community Development is the lead agency in implementing the 2023 Annual Action Plan.

2023 ANNUAL ACTION PLAN

City of Gary

Jerome A. Prince, Mayor

Department of Community Development

Arlene Colvin, Esq. Director

August, 2023

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Annual Action Plan
2023

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JEROME PRINCE
Mayor

CITY OF GARY
DEPARTMENT OF COMMUNITY DEVELOPMENT

ARLENE D. COLVIN
Director

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August 12, 2023

Ms. Danielle D. Tinsley, CPD Director
Office of Community Planning and Development
U.S. Department of Housing and Urban Development
575 Pennsylvania St., Suite 655
Indianapolis. IN. 46204

SUBJECT: 2023 GARY ANNUAL ACTION PLAN

Dear Ms. Tinsley:

I am pleased to submit our 2023 Annual Action Plan for your review and approval. This plan represents the third-year request of our 2021-2025 Consolidated Plan. The Plan was developed using the requirements of 24 CFR 91.220 and guidelines set forth by the Department of Housing and Urban Development. The Plan contains proposed activities, goals, and expected accomplishments for our three (3) grant programs funded under CDBG. HOME and ESG. These funds will be used in 2023 to address many issues in the City of Gary and deliver services to our residents particularly those of low to moderate income.

We look forward to working with you and Ms. Dimick in the implementation of our 2023 Plan. Should you require further information, please do not hesitate to contact me at 219-881-5075.

Sincerely;

Arlene Colvin, Esq.
Director

c: Ms. Lori Dimick, CPD Representative
File

Cover Letter

Annual Action Plan
2023

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2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Recognizing the national objectives of the CDBG and specific program regulations, the City intends to use CDBG, HOME and ESG funds to coordinate programs, services, and projects to create a decent and suitable living environment to benefit low- and moderate-income households and those with special needs. Use of these funds will focus on some of the most critical needs in Gary, based on the following goals and priority needs identified in the 2021-2025 Consolidated Plan:

Priority Goal Areas

The City has established priority areas within each goal. The priority areas that the City will pursue during the time covered by the current Consolidated Plan are outlined as follows:

Goal 1: Housing

- Provide direct and indirect assistance to expand homeownership
- Support homeownership opportunities, education and financial literacy
- Promote diversity of housing stock through new construction for homeowners and renters, including for those with special needs.

Goal 2: Affordable Housing

- Support development and rehabilitation of owner and renter-occupied housing units
- Support development and rehabilitation of mixed income affordable housing in strategic areas in the City.

Goal 3: Community Development

- -Foster neighborhood stability and enrichment by supporting code enforcement and removal of substandard structures.
- Invest in infrastructure and public facility improvements to maintain neighborhoods quality of life.
- Promote revitalization in strategic areas by supporting housing development, infrastructure improvements, spot demolition, code enforcement and other targeted actions.
- Employ green and sustainable practices in all aspects of community improvement and revitalization.

Goal 4: Economic Development

- -Support business development and expansion, particularly in those area that such investment will help increase availability of jobs within the City.
- Promote revitalization by supporting re-use of vacant land and infill development.
- Support activities which enhance employment opportunities and skill development

Goal 5: Public Services

- Support programs and services which ensure availability of a safety net for the underserved particularly for the, youths, elderly and those with special needs.
- Increase local capacity to promote fair housing, outreach and education
- Expand availability of home improvement loans and mortgages in partnership with financial institutions.
- Support programs which assist needy families to become self-sufficient, such as education, after school program or daycare.

Goal 6: Homeless

- -Assist local organizations to provide services and supportive housing to the homeless, particularly victims of family violence.
- Support Continuum of Care Network to maintain coordination and adequate safety net for the homeless families and individuals in the City.
- Support services which ensure outreach, reduce risk of homelessness and support rapid rehousing.

Goal 7: Planning and Administration

- Ensure efficient and coordinated implementation of the Plan

In 2023, the City will fund a variety of housing and community development activities aimed at expanding availability, maintaining affordability, improving quality of housing, and stabilize neighborhoods. Collectively these activities are expected to benefit more than 5,447 individuals or households.

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

In addition to regulating funds, the City also had carry-over balances from the CARES ACT grants. The City’s 2022 funding, however was released late in the fourth quarter of its fiscal year. Due to this fact, the allocated funds were not available to the City for the majority of the fiscal year. The City, however,

relied on other funds to implement several programs. The accomplishments for different programs are outlined below. Collectively these activities benefited about 3,778 individuals or households:

Clearance

- The City demolished and/or cleared 18 structures.
- Code enforcement cited 1,140 properties in eligible areas.
- One vacant parcel was maintained for future redevelopment

Housing

- 28 households received rehab funding from the Housing Repair, Senior Rehab and the Emergency Repair Programs.
- one (1) vacant property was rehabilitated.
- Four (4) families received funding to improve accessibility.
- HOME funds, assisted NWI Habitat for Humanity to construct two (2) new single-family homes.
- HOME funds assisted 3 very low-income families with rent or security deposit assistance (TBRA).
- With Hardest Hit Funds and Indiana Foreclosure Prevention Network, funds for foreclosure assistance and through the assistance of 2 Counselors, 449 referrals were received. Out of those, 10 received trial/permanent loan modification assistance, 5 files in pre-eligible review, 24 files in process or under review, 56 borrowers sending their documents, 35 files were closed for non-response or other reasons.

Housing Counseling

- CDBG funds assisted 3 households with pre- and/or post- purchase homeownership counseling.
- 51 persons were assisted with fair housing and employment rights counseling services

Homeless

- Utilized CDBG and ESG funds to support the Continuum of Care (CoC) and homeless prevention efforts.
- ESG funds were used to assist homeless shelters providing housing for 208 homeless persons.
- With ESG-CV CARES Act funding, assisted through Rapid Rehousing program, 18 households with 63 persons were provided services. In addition, 10 households including 20 persons;
- With ESG-CV Cares funds Food Bank of NWI provided Street Outreach to 252 homeless persons.
- ESG-CV Cares funding assisted Rebuilding the Breach Ministries' Lydia House with renovation of their 21 bed shelter facility.

Public Facilities and Infrastructure Improvements

- CDBG funds assisted improvements in three community centers, Tolleston, Glen Ryan and Roosevelt.
- With CDBG and ESG funds, rehabilitation of the Gary Commission for Women’s public facility continued.
- CDBG funded the purchase of Fire Emergency Rescue Equipment for the Fire Department including Turnout Gear Coats and Pants, 2 ambulances, and thermal imaging cameras.
- Four (4) streets in low- to moderate-income areas of the City were improved, benefiting 12,120 persons.

Public Services

- CDBG funds assisted local agencies to provide a variety of services to 1,463 low- to moderate-income persons.
- With CDBG-CV CARES Act funding, 77,670 persons were reached out with public services responding to the COVID-19 pandemic.
- CDBG provided assistance to 1,123 persons engaged with the Gary Health Department COVID outreach program.
- Gary Health Dept. provided COVID-19 testing, vaccines, and incentives to 1,058 persons.
- With CDBG-CV CARES Act funding, the Catholic Charities Utility Assistance Program provided 64 families with utility assistance, and the Community Development Department's Mortgage Assistance Program provided one (1) household with mortgage assistance.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Summary of Citizen Participation Process and consultation process

- **Announcement of Availability of Funds;** where the City informed previous subrecipients and potential interested agencies to apply for funds. About 19 organizations requested applications after this announcement. The City further made Application for Funding available to interested citizens, local and regional institutions, the Continuum of Care, other organizations (including nonprofit, philanthropic and faith-based); interested agencies, and groups.
- **Availability of Funds;** The City announced availability of funds by advertising on October 17, 2022. The advertisement was posted on the City’s website as well as advertising in one local newspaper, The Times. During this solicitation process, the City provided assistance to those groups in need of assistance. These groups included low-income residents, minorities and non-English speaking groups. Applications were accepted by the City from October 17, 2022 to November 16, 2022. A total of 15 applications were received.

- **Consultation with Continuum of Care and shelter providers;** in which the City discussed funding needs and priorities. This meeting was held on February 28, 2023, 10:00 a.m. at City Hall which included a formerly homeless person.
- **Public Review of Draft Documents:** A summary of the draft Action Plan and a full listing of the activities proposed for 2023 were made available at the public meeting. A digital version of the Summary was also posted on line on the City’s website. Copies of the draft Action Plan were further made available for the public review at the following locations:

City of Gary Community Development Department, 401 Broadway Suite 300, Gary, IN 46402

City of Gary Public Library, Main Branch, 220 West 5th Avenue, Gary, Indiana 46402

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The City of Gary's extensive public and community outreach resulted in numerous valuable comments which shaped the goals and priorities for the Plan. Comments received during the conversations with applicants or meetings showed the several needs and gaps that exist in the City of Gary for a variety of services. Most important issue expressed was the need for public services and the need for facilities for the homeless in the City. The City did consider these comments in development of Plan and formulation of strategies for 2023 funding distribution. During the final public hearing, several questions were asked about the plan approval process and release of funds. The City will provide additional information related to these topics to the Citizens.

6. Summary of comments or views not accepted and the reasons for not accepting them

All comments and suggestions that were received during the public meeting or written comments received have been accepted and incorporated into the Action Plan document.

7. Summary

The 2023 Action Plan represents the third-year progress of a five-year plan adopted by the City and approved by HUD in 2021. In 2023, the City will continue its priorities and will aim to further its goals by proposing 26 different activities. In development of the third-year plan, the City has consulted stakeholders, community groups and citizens. The Third-year activities aim to benefit low- to moderate-income individuals and families and expand opportunities for a wide range of residents consisting of the youth to the elderly. As a whole, the plan is expected to benefit about 5,447 individuals and households in the City, 70.25% of which are low- and moderate-income individuals and families.

The plan was made available for 30 days for public comment beginning July 11, 2023 until August 10, 2023. Draft copies of the document were available in the Department of Community Development offices, in the Library, and online for review. During public comment period, the City received one email requesting information about the plan process and availability of funds. The City plans to provide additional information about the funding and release of funds to citizens.

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
Lead Agency	GARY	
CDBG Administrator	GARY	Department of Community Development
HOPWA Administrator		
HOME Administrator	GARY	Department of Community Development
ESG Administrator	GARY	Department of Community Development
HOPWA-C Administrator		

Table 1 – Responsible Agencies

Narrative (optional)

The City of Gary’s Department of Community Development is the responsible agency within the City for the overall administration of the CDBG, HOME and ESG programs and for preparation of this Annual Action Plan. The three programs are administered by the Department of Community Development. The Department Director handles housing, community development, and community facilities related activities and reporting requirements, while most public services, homeless and redevelopment activities are implemented by the subrecipient agencies.

Projects are evaluated by the Department of Community Development Staff and other community stakeholders to ensure eligibility and compliance with the Consolidated Plan objectives and priorities and City’s overall revitalization strategies.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(I)

1. Introduction

In preparation of the 2023 Annual Plan, the City engaged in a variety of consultation activities with residents, social service agencies, neighborhood groups and housing provider organizations. The City of Gary also continued its efforts through the NWI Action Council (NWIAC) which is acting as the local Continuum of Care Network to ensure coordination with different service providers and agencies involved in housing, homeless and public health related activities. The input the City received through these efforts have all influenced funding decisions for the proposed 2023 activities.

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(I))

The City of Gary consulted with public housing, governmental health, mental health, private non-profits, and other community stakeholders throughout 2022 and 2023 on issues related to housing, homeless, and general community development. These consultations comprised of one-on-one conversations, group discussions, or community gatherings for project development and implementation. Specifically, the City engaged in the following activities to enhance coordinated between the City and assisted housing, health services providers, and mental health agencies.

- Coordination with the assisted housing providers in the City is an ongoing process that the City is regularly engaged. A good example is the City is in continued communications through its Rapid Rehousing program with housing providers to ensure availability of suitable housing for different individuals and families.
- The City regularly meets with assisted housing providers, CHDO’s and developers to encourage development of affordable housing. In 2022 and 2023 several of such meetings took place by different departments including Community Development Department.
- The City held several meetings with different organizations providing a variety of services and programs. These meetings occurred in 2022 and 2023.
- To ensure coordination with the public and assisted housing providers, the City has engaged with the Gary Housing Authority (GHA) in several housing revitalization initiatives that GHA is contemplating as a part of its transformation process. Other collaborations with GHA may be pursued once other projects come on board with GHA.
- The City will assist NWI Reinvestment Alliance in 2023 with \$40,000 in ESG funding. Through the efforts of this agency, the City ensures coordination among different service providers including those providing assistance to the homeless, elderly, health agencies, foster care, mental health and discharged persons.
- The City continues to fund or be a resource for several public and health services agencies to create a minimum level of social safety net in the City. In 2023, the City will fund three agencies

which provide social, food, and health services to children, the youth and families. These agencies are; 1) Gary Health Department, 2) Gary Youth Services Bureau, and 3) Meals on Wheels of NWI.

- The City will continue to work with local health agencies to ensure continued services for lead hazard protection and screening. The City will fund the Gary Health Department in 2023 for lead poisoning screening.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The NWI Action Council (NWIAC) is currently acting as the local Continuum of Care agency. The agency serves as the local coordinating body for the annual Homeless Point-in-Time Count for Sheltered and Unsheltered residents. The “Council” includes emergency shelter providers, transitional housing and supportive service providers, as well as a host of temporary and permanent housing providers. The local providers and support agencies provide a variety of services and programs. They include agencies such as medical and hospital, law enforcement, foster care agencies, legal advisors, Community Development Housing Corp. (CHDO), Indiana University, Lake County Recorder Office and Human Relations Agency. Through funding of the Continuum of Care Network, the City ensures coordination among these agencies, consisting of more than 60 different services providers including those for families, veterans and unaccompanied youth. The Coordinated entry process was instituted to help our community prioritize assistance for the homeless based on vulnerability and severity of service needs.

The City will fund NWI Reinvestment Alliance to coordinate homeless related activities which includes Homeless Prevention, Rapid Rehousing and HMIS reporting. The Alliance is the local agency for development, planning, and coordinating the homeless needs, including those with chronic homelessness. Continuum of Care was consulted on February 28, 2023 for the distribution of homeless funds and selection of agencies to receive such funds.

The Continuum of Care Network’s coordination activities in 2023 is expected to include:

- Regular meetings with the members to exchange information.
- Technical support and assistance to the membership, including (a) HMIS support training through the Statewide Balance of State (Continuum of Care), and (b) Super NOFA technical project support and workshops
- Point-In-Time Count in January 25, 2023
- Coordination of funding requests for member agencies
- Engage Continuum of Care Network to participate and provide input in the decisions for allocating funds for homeless service providers
- The Continuum of Care Network continually updates its assessment plan. This plan aims to provide a coordinated process for housing the homeless including establishing a priority

vulnerability list, that identifies chronically homeless and those families and/or individuals who have episodic homelessness. In development of this plan, the Gary's need is fully considered.

- The Continuum of Care Network participates in several Statewide Committees (i.e., McKinney Vento Housing Committee, Inter-Agency Council, and HMIS-Advisory).

The City also regularly participates in meetings, committees and work groups of the NWI Action Council. These activities expand opportunities to better coordinate housing and support services needs of the Gary's most vulnerable populations such as chronically homeless individuals and families, homeless families with children and veterans. The City further provides technical assistance to different agencies to apply for funding from agencies outside the City to expand availability of resources. Lastly, the City makes efforts to align its annual objectives with the goals of the Continuum of Care Network to address the needs in a most effective manner.

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

Annually, the City of Gary issues a Request for Proposal (RFP) for funding to inform agencies of availability of funding. As a part of this process, the City holds meetings with service providers to get input for allocation of available funds. The City also provides technical support to potential applicants to broaden opportunities for funding of new applications. Any agency that is eligible may submit an application without regard to community or faith-based status so long as they comply with HUD eligibility requirements. The City also meets with previously funded agencies to answer questions and inform them of availability of funding. The Continuum of Care regularly participates in these meetings.

For ESG funded projects, the City's project review committee schedules one or two review meetings with the Continuum of Care Network to review all requests for funding. Continuum of Care Network representatives, typically consist of the Executive Director and a homeless or formerly homeless person, are requested to participate in review of all applications for funding. This meeting occurred on February 28, 2023. The joint committee reviews all applications for eligibility and other program requirements. Eligible applicants are then selected and further reviewed for their level of needs and impact. The committee selects a list of potential agencies for funding and makes recommendation to the Department for final approval. In 2023, the City elected to assign about 60% of its ESG funds to shelter operations and the remaining for homeless prevention and rapid rehousing.

Performance standards and outcomes for the Emergency Solutions Grant (ESG) were established by the City through a collaborative process at the beginning of ESG program. This process included consultation with the Continuum of Care Network. The standards are annually reviewed and modifications may be to better align the Continuum of Care goals with the regulatory requirements of the ESG program.

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	Gary Housing Authority
	Agency/Group/Organization Type	Housing PHA Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Public Housing Needs Redevelopment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Review of the Housing Authority's five-year plan. Review of strategic plan and progress on its transformation plan and needs. Assistance in demolition of public housing units. Collaboration for development of new housing community in the City and particularly in Downtown area.
2	Agency/Group/Organization	CONTINUUM OF CARE OF NWI
	Agency/Group/Organization Type	Services-homeless Publicly Funded Institution/System of Care Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Continuum of Care of NWI was consulted to address the housing and social and health services needs of the homeless, those in need of health and mental health services, and discharged persons from institutional or foster care programs in the City of Gary. The consultation aims to coordinate regional homeless prevention efforts and provisions of services.

3	Agency/Group/Organization	Habitat for Humanity of Northwest Indiana
	Agency/Group/Organization Type	Housing Services - Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Affordable Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Habitat for Humanity of Northwest Indiana was consulted to address affordable housing needs. Outcome: 1-2 affordable housing units.
4	Agency/Group/Organization	Gary Commission for Women/Ark Shelter
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence Services-homeless
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Gary Commission for Women was consulted to address the homeless needs particularly those that are victims of family violence. Outcome: Protection of 200 homeless families and children
5	Agency/Group/Organization	Gary Health Department
	Agency/Group/Organization Type	Services-Health
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Gary Health Department was consulted to address social and health needs of families and children for health and lead based paint related issues. Outcome: Protection 1500 of individuals.

6	Agency/Group/Organization	Gary Youth Services Bureau
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Youth Services Bureau was consulted to address recreational needs of the youths in the City of Gary. Outcome: Education and mentoring of 200 youths.
8	Agency/Group/Organization	CRISIS CENTER
	Agency/Group/Organization Type	Services-homeless
	What section of the Plan was addressed by Consultation?	Homelessness Needs - Unaccompanied youth
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The Crisis Center was consulted to address homeless needs of the runaways and unaccompanied children. Outcome: Prevention of homelessness, 300 youths.
9	Agency/Group/Organization	Rebuilding the Breach Ministries (Lydia House)
	Agency/Group/Organization Type	Services-homeless Transitional Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Rebuilding the Breach Ministries was consulted to address women homeless needs and provide services. Outcome: Transitional Housing and support for up to 24 people.

10	Agency/Group/Organization	BROADWAY AREA CDC
	Agency/Group/Organization Type	Housing Community Development Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Affordable Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Broadway CDC was consulted about the Washington Manor development and to address affordable housing and housing construction.
11	Agency/Group/Organization	Gary Human Relations Commission
	Agency/Group/Organization Type	Service-Fair Housing
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Fair Housing
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	GHRC was consulted to affirmatively furthering fair housing and to remove discrimination in areas of housing, employment, education, and public accommodation. Outcome: Up to 110 people will be provided with counseling and fair housing education.
12	Agency/Group/Organization	NORTHWEST INDIANA REINVESTMENT ALLIANCE
	Agency/Group/Organization Type	Housing
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	NWI Reinvestment Alliance was consulted for homeless needs and rapid rehousing. Outcome: 100 persons assisted with housing.

Identify any Agency Types not consulted and provide rationale for not consulting

The City's outreach for input and consultation included about nineteen agencies or organization. Agencies that have been directly consulted for this plan are identified in previous section. No interested agency was excluded.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Continuum of Care NWI (NWI Action Council)	The Strategic Plan for the City of Gary includes goals of the Continuum of Care. These goals are written to support the efforts of the community that serves our homeless neighbors.
PHA Plans, 2020 Five Year Plan	Gary Housing Authority	PHA Plan is incorporated in the Five-Year Consolidated Plan and the Annual Action Plans. The goals of the Strategic Plan are compatible with the Housing Authority of the City of Gary's Five-Year Plan.
Gary Comprehensive Plan	Gary Planning Commission	Different elements of the 2019 Comprehensive Plan were incorporated to ensure compliance with zoning and future land uses.
NIRPC 2050 Plan	Northwest Indiana Regional Planning Commission	NIRPC's 2050 plan is incorporated in both economic development as well transportation and accessibility of different neighborhoods in the City of Gary
NIRPC Ecommerce Plan	Northwest Indiana Regional Planning Comm.	Redevelopment and economic development opportunities in the City of Gary, particularly those related to redevelopment of vacant lands along major corridors.
2022 Analysis of Impediments (AI)	City of Gary, Community Development	Fair housing, exclusionary practices, employment opportunity and lending practices.

Table 3 – Other local / regional / federal planning efforts

Narrative (optional)

The City's consultation efforts were broad and not limited to the above list of agencies who participated in the process.

The City throughout the year made outreach and consultation efforts to ensure participation. These consultation efforts include:

- The Department of Community Development maintains close coordination with other City departments, Continuum of Care, social services organizations and regional planning and business development organizations. The CDBG projects are coordinated with the Building Department, Parks and Recreation Department, Department of Redevelopment and Zoning, Public Works/Safety, and many social services agencies that are either local or operate on a regional basis but provide services in the City of Gary.
- Outreach and invitation to participate were sent to about 30 different agencies through emails or direct invitation.
- Conversations with different neighborhood groups particularly those in the target areas.
- Consultation and conversation with housing providers including Gary Housing Authority, CDC's, private housing providers and landlords
- Communication with the business groups, Chamber of Commerce and business establishments about needs.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

For the 2023 Annual Action Plan, the City made efforts to broaden the outreach to gain insight on housing and community development needs and priorities and to set annual goals to be met with HUD funding. The efforts consisted of the following activities:

- A Neighborhood survey was posted online to reach the community at large. In addition, the City used different occasions to distribute the survey to get input from agencies or citizens. These surveys were used to establish funding priorities. The tabulated results of this survey is attached in the Appendix. The results of this survey indicate that the citizens see the largest need in the City is for public services.
- The City announced availability of funds and sent requests for proposals (RFP's) for CDBG, HOME, and ESG funding to agencies to encourage participation. (October 17, 2022)
- The City directly contacted and provided application packages to 19 different agencies.
- The City offered technical assistance and meetings with agencies/organizations on how to complete the Application and submit forms.
- Interviews and community discussions with various stakeholders and interested agencies to encourage participation.
- The City held a public hearing for review of the 2022 Consolidated Annual Performance and Evaluation Report (CAPER) and to request comments on the draft CAPER. This meeting was held on March 13, 2023.

Above activities contributed to the funding decisions and establishment of goals for 2023 by the City of Gary. The City held a public hearing for review of the plan and to request comments on the draft Action Plan. This meeting was held on July 11, 2023. Eight (8) individuals attended this meeting in addition to four (4) City staff.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Hearing	Minorities Non-English Speaking - Specify other language: Spanish Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	The City held a public hearing for review of the plan and to request comments on the draft Action Plan. This meeting was held on July 11, 2022. About nine (9) individuals attended this meeting in addition to four (4) City staff.	There was two comments during the meeting. Both of these comments related to process of release of funds. Please see public hearing comments in the Attachments Section of the Action Plan.	All comments were accepted and incorporated into the Action Plan.	https://gary.gov

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing	No responses received	No responses received	No responses received	
3	Internet Outreach	Minorities Non-targeted/broad community	No responses received	No responses received	No responses received	

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
4	Public Hearing	<p>Minorities</p> <p>Non-English Speaking - Specify other language: Spanish</p> <p>Persons with disabilities</p> <p>Non-targeted/broad community</p> <p>Residents of Public and Assisted Housing</p>	<p>Review of 2022 Annual CAPER and to request comments on the draft report. The meeting was held on March 13, 2022. About fourteen (14) individuals attended this meeting.</p>	<p>5 comments received during the meeting</p>	<p>All comments were accepted and no further action was required.</p>	<p>https://gary.gov</p>

Table 4 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The Action Plan is the annual plan which the City prepares pursuant to the goals outlined in the 2021-2025 Consolidated Plan. The Action Plan details the activities the City will undertake in 2023. These activities will aim to address the housing, homeless and community development needs of the City using CDBG, HOME, ESG funds.

During the third year of the Plan (Program Year 2023), Gary is expected to receive an allocation of \$3,410,692 in CDBG funding for housing, public services and community development activities. The anticipated funds from HOME Program is expected to be about \$715,992. Emergency Solutions Grant (ESG) is planned to receive \$298,265 for 2023 program year. The City also expects to collect about \$13,803 in program income through the HOME program. These dollars are typically rolled into another HOME funded Program (First Time Home Buyer) and expended as a part of that activity.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	3,410,692	0	0	3,410,692	6,542,924	Expected Amount Available for remainder of ConPlan estimated at an annual grant of \$3,355,000 with no program income annually.
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	755,992	13,803	0	769,795	646,097	Expected Amount Available for remainder of ConPlan estimated at an annual grant of \$558,000 with 14,000 program income annually.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	298,235	0	0	298,235	512,319	Expected Amount Available for remainder of ConPlan estimated at an annual grant of \$280,000 with no program income annually.

Table 5 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

CDBG funds will leverage other federal funds from Equal Employment Opportunity Commission, Fair Housing and Equal Opportunity for fair housing efforts for an amount about \$74,180. CDBG funds will further leverage federal funds for food assistance as well as state funds for housing and social services activities among others. Collectively, public service agencies will leverage about \$1,145,903 from other sources.

CDBG fund will further leverage local investment, for different housing projects that are privately owned. CDBG funds will leverage local Tax Increment Financing (TIF) funds for demolition and redevelopment activities (\$150,000). HOME funds are expected leverage private funds in the form of private equity as well as anticipated construction of eight (8) homes by local organizations.

The required 100% match for ESG program is projected to be in the form of in-kind/volunteer labor, cash, private donations, Anderson Foundation, Mortar Net Solutions, Trinity Lutheran Church, and other local foundations and agencies.

The CDBG and HOME programs do not require a match, however ESG funds require match funding. The City of Gary often makes attempts to augment federal funds with local, private and other sources. In 2023, the City will partner with five (5) agencies using CDBG funds. Similarly, the City will partner with at least two (2) agencies using HOME funds to develop or rehabilitate housing in the City. The total investment of these organizations is estimated to exceed \$1,636,111. Sources of funding by different agencies is estimated to consist of the following:

- Federal Funds \$102,612
- State Funds \$371,060
- Local \$863,148
- Private \$193,864
- Others \$105,427

Total \$1,636,111

For the ESG program, the City requires funded organizations to provide match as required. These organizations typically use such funds to support the funded activity with at least equal amounts of local funds. Other funding is expected to be pursued for redevelopment and for land banking and related development projects.

Agency ESG Funding Match Amount Source

Crisis Center \$148,941, Match \$115,000 Anderson Foundation, \$33,941 Mortar Net Solutions
Rebuilding the Breach Ministries \$30,000, Match \$30,000 Trinity Lutheran Church, Judson and Linda Salmon
NWI Reinvestment Alliance \$40,000, Match \$40,000 NWI Reinvestment Alliance
NWI Reinvestment Alliance \$56,927, Match \$56,927 NWI Reinvestment Alliance
Administration \$22,367, Match \$22,367 Community Development Block Grant

Total \$298,235, Match \$298,235

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

The City of Gary typically sells or makes available publicly owned land for development or redevelopment. All properties sold through the City's programs typically benefit low- or moderate-income families or must support one of primary goals of the City's strategies for affordable housing or economic development. The City mostly acquires these properties from the County at no or limited cost. The properties are land banked by the Redevelopment Commission for future development of housing, commercial or industrial uses.

In recent years, the City has developed partnership with the Gary Housing Authority by which City-Owned properties are transferred to GHA and in return GHA properties are assigned to the City for redevelopment. The City anticipate similar actions to continue in the next five years, as several GHA properties are proposed for demolition.

Similar to GHA, the City also has engaged with the Gary Community School Corp. and either acquire or facilitate acquisition of vacant school properties for redevelopment. Since most of these properties are generally located in neighborhoods, development of housing is often the best use. However, the vacant land often can support other uses. The City will work with other public and private partners to redevelop these sites for more productive use, based on the needs of community and land use suitability. The City views such practice a sustainable effort to maintain the community or preserve the neighborhoods. The City also pursues ownership of properties where demolition occurs. These properties are often used for infill development or land banking for redevelopment.

Discussion

The City of Gary plans to invest available resources in 2023 in projects that can maximize impact in the community by creating synergy and leveraging other funding resources. The City of Gary's primary focus will be to address the needs of low-and moderate-income families and support activities that garner additional resources and partnerships to implement the program.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Housing	2021	2025	Housing	CITYWIDE	Housing Affordable Housing	CDBG: \$30,000 HOME: \$61,403	Public service activities for Low/Moderate Income Housing Benefit: 20 Households Assisted Direct Financial Assistance to Homebuyers: 4 Households Assisted
2	Affordable Housing	2021	2025	Affordable Housing Public Housing Non-Homeless Special Needs	CITYWIDE	Housing Affordable Housing Non-Homeless Special Needs	CDBG: \$1,150,000 HOME: \$632,793	Homeowner Housing Added: 8 Household Housing Unit Homeowner Housing Rehabilitated: 35 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Community Development	2021	2025	Non-Housing Community Development	CITYWIDE	Non-Housing Community Development	CDBG: \$1,188,485	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 1405 Persons Assisted Businesses assisted: 36 Businesses Assisted Buildings Demolished: 40 Buildings Housing Code Enforcement/Foreclosed Property Care: 1050 Household Housing Unit Other: 1 Other
5	Public Services	2021	2025	Non-Homeless Special Needs Non-Housing Community Development	CITYWIDE	Non-Housing Community Development Public Services Non-Homeless Special Needs	CDBG: \$390,049	Public service activities other than Low/Moderate Income Housing Benefit: 2575 Persons Assisted
6	Homeless	2021	2025	Homeless	CITYWIDE	Homeless	ESG: \$275,868	Homeless Person Overnight Shelter: 174 Persons Assisted Homelessness Prevention: 100 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Planning and Administration	2021	2025	Planning and Administration	CITYWIDE	Housing Affordable Housing Non-Housing Community Development Economic Development Public Services Homeless Non-Homeless Special Needs	CDBG: \$652,158 HOME: \$75,599 ESG: \$22,367	Other: 3 Other

Table 6 – Goals Summary

Goal Descriptions

1	Goal Name	Housing
	Goal Description	<p>Housing goal aim to support opportunities for housing development which expand diversity of housing choice, rehabilitation and development of modern mixed uses for diverse income groups.</p> <ul style="list-style-type: none"> • Provide direct and indirect assistance to expand homeownership • Support homeownership opportunities, education and financial literacy • Promote diversity of housing stock through new construction for homeowners and renters, including for those with special needs.

2	Goal Name	Affordable Housing
	Goal Description	<p>A high priority needs exists to maintain and improve housing conditions for homeowners and renters in the City of Gary. The old age of current housing stock, requires assistance to existing homeowners to maintain their homes and provision of affordable housing to renters in the form of rehabilitation or construction of new housing. Affordable housing strategy supported include:</p> <ul style="list-style-type: none"> • Support development and rehabilitation of owner and renter-occupied housing units
3	Goal Name	Community Development
	Goal Description	<p>Non-housing community development priority aims to remove influences of blight and promote neighborhood livability. Priorities will be placed on strategies which support infrastructure and public facility improvements, redevelopment and activities which maintain the fabric of neighborhoods.</p> <ul style="list-style-type: none"> • Foster neighborhood stability and enrichment by supporting code enforcement and removal of substandard structures. • Invest in infrastructure and public facility improvements to maintain neighborhoods quality of life. • Promote revitalization in strategic areas by supporting housing development, infrastructure improvements, spot demolition, code enforcement and other targeted actions.
5	Goal Name	Public Services
	Goal Description	<p>Availability of a safety net ensures community stability and wellbeing. Priority is placed to maintain adequate level of public services that will support activities which promote self-reliance, assist people with special needs, assist families, and ensure housing choice in the community.</p> <ul style="list-style-type: none"> • Support programs and services which ensure availability of a safety net for the underserved particularly for the, youths, elderly and those with special needs. • Increase local capacity to promote fair housing, outreach and education

6	Goal Name	Homeless
	Goal Description	<p>Eliminating the causes and risks of homelessness will reduce the incidents of homelessness. Strategies which provide support services, outreach, rapid rehousing and supportive housing will be primary actions under this goal.</p> <ul style="list-style-type: none"> • Assist local organizations to provide services and supportive housing to the homeless, particularly victims of family violence. • Support Continuum of Care Network to maintain coordination and adequate safety net for the homeless families and individuals in the City. • Support services which ensure outreach, reduce risk of homelessness and support rapid rehousing.
7	Goal Name	Planning and Administration
	Goal Description	<p>Provide program management and oversight for HUD entitlement funds, CDBG, HOME and ESG, and for the successful administration of Federal, state, and local funded programs, including planning services, environmental clearance, fair housing, and compliance with all Federal, state, and local laws and regulations. Specific goal will aim to:</p> <ul style="list-style-type: none"> • Ensure efficient and coordinated implementation of the Plan

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Gary proposes to fund 25 different activities in 2023. All proposed activities aim to advance seven goals identified in the previous section (AP-20), and to address housing and community development and homeless needs of the community for Program Year 2023. The following Table, lists proposed Program Year 2023 activities (projects).

Projects

Projects

#	Project Name
1	Street Improvement Project
2	Gary Health Department - Sexually Transmitted Diseases
3	Gary Health Department (Lead Poisoning Prevention)
4	Gary Human Relations - Fair Housing and Employment
5	Youth Services Bureau (YSB)
6	Homeownership Opportunity Network (HON)
7	Meals on Wheels of NWI
8	Emergency Repair Program
9	Housing Repair Program
10	Senior Rehab Program
11	Neighborhood Rehab Program
12	Accessibility Program
13	Housing Rehab Administration
14	Redevelopment Division (Demolition)
15	Neighborhood Conservation/Code Enforcement
16	Temporary Property Management Program
17	Gary Micro Enterprise Initiative (GMI)
18	Payment of interest for Section 108 Loan
19	General Administration
20	CHDO Set-A-Side
21	First-Time Homebuyer Program
22	Affordable Housing
23	Habitat for Humanity of NWI (Field of Dreams Project)
24	Administrative Reserve

#	Project Name
25	City of Gary Emergency Solutions Grant Program

Table 7 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Priority Needs Allocation

Goal Area	Funded \$	%
Administration	\$ 652,158	19.1%
Affordable Housing	\$ 1,782,793	31%
Infrastruc. & Pub. Facilities	\$ 150,000	4.4%
Public Services	\$ 420,049	12.3%
Demolition and Revit.	\$ 658,295	19.3%
Economic Development	\$107,448	3.2%
Homeless	\$ 275,868	6.1%

AP-38 Project Summary
Project Summary Information

1	Project Name	Street Improvement Project
	Target Area	CITYWIDE
	Goals Supported	Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$150,000
	Description	CDBG funds will be used for the repaving of several blocks and ancillary street improvements in areas of 9th -11th Avenues and Madison Street that are primarily low to moderate income. Approximately 1,405 person will be assisted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,405 persons of low to moderate income will be assisted. (0-80% MFI)
	Location Description	9th -11th Streets and Madison Avenue in Midtown Neighborhood
	Planned Activities	The national objective is Low/Mod Income Area Benefit (LMA). The project matrix code is 03K, Street Improvements.
2	Project Name	Gary Health Department - Sexually Transmitted Diseases
	Target Area	CITYWIDE
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$49,962
	Description	CDBG funding will provide for the promotion of healthy living through education, prevention, protection, and intervention of sexually transmitted diseases. Approximately 1,500 low/mod. income (0-80%) persons will be assisted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 1,000 Low to Moderate income persons will be assisted. (0-80%)
	Location Description	1145 West 5th Avenue, Gary, IN.
	Planned Activities	The national objective is Low/Mod Income Clientele Benefit (LMC). The project matrix code is 05M, Health Services.

3	Project Name	Gary Health Department (Lead Poisoning Prevention)
	Target Area	CITYWIDE
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$48,000
	Description	CDBG funding will provide for the testing, monitoring, and documentation of lead levels of children and/or adults at risk. Approximately 200 low income (0-80%) persons will be assisted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 200 Low to Moderate income persons will be assisted. (0-80%)
	Location Description	1145 West 5th Avenue, Gary, IN.
	Planned Activities	The national objective is Low/Mod Income Clientele Benefit (LMC). The project matrix code is 05P, Screening for Lead Poisoning.
4	Project Name	Gary Human Relations - Fair Housing and Employment
	Target Area	CITYWIDE
	Goals Supported	Public Services
	Needs Addressed	Housing Affordable Housing Economic Development
	Funding	CDBG: \$85,000
	Description	CDBG funds will be used for human rights counseling services to Gary residents who feel that they have been discriminated against in areas of housing, employment, education, and public accommodation. Also, promotion of fair housing awareness to housing service providers and community leaders with specific emphasis on the disadvantages and barriers in housing for disabled persons, veterans, and homeless individuals. Approximately 150 persons will be assisted which will include 30 extremely low income (0-30% MFI), 10 very low income (31-50% MFI), and 70 low income (51-80% MFI).
	Target Date	12/31/2024

	Estimate the number and type of families that will benefit from the proposed activities	Approximately 150 low- and moderate-income persons will be assisted (0-80%)
	Location Description	455 Massachusetts St., Gary, IN 46402
	Planned Activities	The national objective is Low/Mod Income Clientele Benefit (LMC). The project matrix code is 05J, Fair Housing Activities.
5	Project Name	Youth Services Bureau (YSB)
	Target Area	CITYWIDE
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$87,087
	Description	YSB will offer Tutoring, Martial Arts and Boxing classes that will allow youth to refocus their thought patterns in a positive way and mentor them to potentially succeed in life. Estimated 200 low to moderate income persons will be assisted (0-80%).
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 200 low to moderate income persons will be assisted. (0-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Clientele Benefit (LMC). The project matrix code is 05D, Youth Services.
6	Project Name	Homeownership Opportunity Network (HON)
	Target Area	CITYWIDE
	Goals Supported	Housing Affordable Housing
	Needs Addressed	Housing Affordable Housing Public Services
	Funding	CDBG: \$30,000

	Description	CDBG funds will be used for a one stop housing shop that assists homebuyers & existing home-owners with services relating to homeownership loan products both for purchasing a home or home improvement loans through education and post counseling. Approximately 20 low to moderate income (0-80% MFI) persons will be assisted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 20 low to moderate income persons will be assisted. (0-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Clientele Benefit (LMC). The project matrix code is 05U, Housing Counseling.
7	Project Name	Meals on Wheels of NWI
	Target Area	CITYWIDE
	Goals Supported	Public Services
	Needs Addressed	Public Services
	Funding	CDBG: \$120,000
	Description	CDBG funds will be used for a Gary meal delivery program to serve elderly homebound residents by delivering a healthy meal with a wellness check and visit to them each day. It is anticipated that 95,810 meals will be delivered to 525 low-income Gary elderly residents 62 yrs. of age.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 525 low to moderate income persons will be assisted. (0-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Clientele Benefit (LMC). The project matrix code is 05A, Senior Services.
8	Project Name	Emergency Repair Program
	Target Area	CITYWIDE

	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	CDBG: \$125,000
	Description	CDBG funds will provide for grants to address the needs of low to moderate-income income eligible Gary owner-occupied homeowners to eradicate conditions which may be an imminent threat to their health, safety, and/or welfare. The program provides funds for emergency repair assistance when it is determined to be necessary to alleviate unsafe, hazardous, and/or unsanitary living conditions and provides a maximum limit of up to \$10,000 for those income eligible Gary homeowners who would otherwise be financially unable to improve their own dwelling conditions. Eligible items include: HVAC, water heater replacement, and potentially hazardous electrical and plumbing repairs. Approximately 12 low to moderate income (0-80% MFI) households will be assisted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 12 low to moderate income families will benefit. (0-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 14A, Rehab; Single-Unit Residential.
9	Project Name	Housing Repair Program
	Target Area	CITYWIDE
	Goals Supported	Affordable Housing
	Needs Addressed	Housing Affordable Housing
	Funding	CDBG: \$100,000

	Description	CDBG funds will provide rehabilitation grants city-wide for low to moderate income, single-family owner-occupied Gary homeowners. A rehabilitation grant up to a maximum of \$30,000 may be awarded to income eligible homeowners for the purpose of making needed repairs to their residential properties to bring them into code compliance, eliminate violations that threaten the health and safety of the occupants of the home, and/or provide disabled accessibility to those seniors with disabilities to enable them to remain living in their home for as long as possible. The total cost of repairs cannot exceed \$30,000. Eligible repairs (but not an all-inclusive list) include: Roof, plumbing, HVAC, electrical, and disabled accessibility. Approximately 4 low to moderate income (0-80% MFI) households will be assisted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4 low to moderate income families will benefit. (0-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 14A, Rehab; Single-Unit Residential.
10	Project Name	Senior Rehab Program
	Target Area	CITYWIDE
	Goals Supported	Affordable Housing
	Needs Addressed	Housing Affordable Housing Non-Homeless Special Needs
	Funding	CDBG: \$350,000

	Description	CDBG funds will provide rehabilitation grants city-wide for low to moderate income, single-family owner-occupied Gary senior homeowners 62 yrs. of age or older. A rehabilitation GRANT up to a maximum of \$30,000 may be awarded to income eligible senior homeowners for the purpose of making needed repairs to their residential properties to bring them into code compliance, eliminate violations that threaten the health and safety of the occupants of the home, and/or provide disabled accessibility to those seniors with disabilities to enable them to remain living in their home for as long as possible. The total cost of repairs cannot exceed \$30,000. Eligible repairs (but not an all-inclusive list) include: Roof, plumbing, HVAC, electrical, and disabled accessibility. Approximately 11 low to moderate income (0-80%) households will be assisted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 11 low to moderate income families will benefit. (0-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 14A, Rehab; Single-Unit Residential.
11	Project Name	Neighborhood Rehab Program
	Target Area	CITYWIDE
	Goals Supported	Affordable Housing
	Needs Addressed	Housing Affordable Housing
	Funding	CDBG: \$125,000
	Description	CDBG funds will be used for the rehabilitation of two (2) properties acquired under the Neighborhood Stabilization Programs (NSP1 and NSP3) to be sold to low to moderate income persons.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Two (2) low to moderate income families will benefit. (0-80%)
	Location Description	University Park Area

	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 14A, Rehab; Single-Unit Residential.
12	Project Name	Accessibility Program
	Target Area	CITYWIDE
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing Non-Homeless Special Needs
	Funding	CDBG: \$100,000
	Description	CDBG funds will provide for grants for disabled access ramps only for low to moderate income, single-family owner-occupied Gary homeowners with physical disabilities who are unable to get in or out of their home. An accessible ramp grant, up to a maximum of \$15,000, may be awarded to income eligible homeowners, regardless of age, for the purpose of providing disabled access to get in and out of their home. The amount of the total cost of the ramp cannot exceed \$15,000. Approximately 6 low to moderate income (0-80% MFI) households will be assisted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 6 low to moderate income families will benefit. (0-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 14A, Rehab, Single family residential.
13	Project Name	Housing Rehab Administration
	Target Area	CITYWIDE
	Goals Supported	Housing Affordable Housing
	Needs Addressed	Housing Affordable Housing Non-Homeless Special Needs
	Funding	CDBG: \$350,000
	Description	CDBG funds will be used for activity delivery costs directly related to carrying out the Community Development housing rehabilitation activities.

	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 14H, Rehab Administration.
14	Project Name	Redevelopment Division (Demolition)
	Target Area	CITYWIDE
	Goals Supported	Community Development
	Needs Addressed	Non-Housing Community Development Economic Development
	Funding	CDBG: \$400,000
	Description	CDBG funds will be used for the operation of the demolition of unsafe structures throughout the City. Approximately 40 unsafe structures will be demolished.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	40 unsafe structures will be demolished
	Location Description	Citywide
	Planned Activities	The national objective is Slum/blight Spot Benefit (SBS). The project matrix code is 04, Clearance and Demolition.
15	Project Name	Neighborhood Conservation/Code Enforcement
	Target Area	CITYWIDE
	Goals Supported	Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$248,295

	Description	CDBG funds will be used for support of the removal of blighting conditions in the City of Gary in designated areas where neighborhoods are significantly deteriorated, on-going redevelopment efforts are in place, or revitalization opportunities exist. Approximately 1050 property inspections will be conducted.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	1,050 properties to be inspected (LMA Benefit)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Area Benefit (LMA). The project matrix code is 15, Code Enforcement.
16	Project Name	Temporary Property Management Program
	Target Area	CITYWIDE
	Goals Supported	Community Development
	Needs Addressed	Non-Housing Community Development Economic Development
	Funding	CDBG: \$10,000
	Description	CDBG funds will be used towards temporary management costs for grass mowing at the property acquired at 600 E. 35th Ave. until final disposition of the property occurs.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	1,415 Low- and Moderate-income persons (0-80%)
	Location Description	600 E. 35th Ave., University Park
	Planned Activities	The national objective is Low/Mod Income Housing Benefits (LMH). The project matrix code is 02, Disposition of Real Property.
17	Project Name	Gary Micro Enterprise Initiative (GMI)
	Target Area	CITYWIDE
	Goals Supported	Community Development
	Needs Addressed	Economic Development

	Funding	CDBG: \$107,448
	Description	GMI will provide instructor-led small business development training delivered in a traditional classroom setting using a comprehensive curriculum specifically designed for Micro-entrepreneurs both Food Entrepreneurs and Entrepreneurs who will start any type of business. Approximately 36 micro-entrepreneurs will be assisted free of charge for low to moderate income Gary residents.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 36 businesses will be assisted.
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Clientele Benefit (LMCMC). The project matrix code is 18C, Micro Enterprise Assistance.
18	Project Name	Payment of interest for Section 108 Loan
	Target Area	CITYWIDE
	Goals Supported	Community Development
	Needs Addressed	Non-Housing Community Development
	Funding	CDBG: \$272,742
	Description	CDBG funds will be used for interest payment for a 108 Loan repayment.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Citywide
	Planned Activities	The project matrix code is 24A, Payment of Interest on Section 108 Loans
19	Project Name	General Administration
	Target Area	CITYWIDE
	Goals Supported	Planning and Administration

	Needs Addressed	Housing Affordable Housing Non-Housing Community Development Economic Development Public Services Homeless Non-Homeless Special Needs
	Funding	CDBG: \$652,158
	Description	CDBG funds will be used for the overall program administration of the CDBG program.
	Target Date	12/31/2024
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	401 Broadway, #300, Gary, IN 46402
	Planned Activities	The project matrix code is 21A, General Program Administration.
20	Project Name	CHDO Set-A-Side
	Target Area	CITYWIDE
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$113,399
	Description	Funding will provide for the development of 2 affordable housing units that will be made available to low to moderate income households within the City of Gary. (30-80%).
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Two low- and moderate-income families (30-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 12, Construction of Housing.
21	Project Name	First-Time Homebuyer Program

	Target Area	CITYWIDE
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$61,403
	Description	Funding will provide down payment, closing costs, and mortgage rate buy downs to qualifying 1st time home buyers who participate in the Homeownership Opportunity Network workshops supported by the City of Gary. Existing properties and new construction properties can receive up to \$10,000 per household.
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 4 low to moderate income families will be assisted. (0-80%)
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 13, Direct Homeownership Assistance.
22	Project Name	Affordable Housing
	Target Area	CITYWIDE
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$369,394
	Description	Funding will be used for the development of affordable housing in the City for low to moderate income households. Up to four (4) units will be developed and offered to low- and moderate-income households (30-80%)
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Four (4) low- and moderate-income family (30-80%).
	Location Description	Citywide
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 12, Construction of Housing

23	Project Name	Habitat for Humanity of NWI (Field of Dreams Project)
	Target Area	CITYWIDE
	Goals Supported	Affordable Housing
	Needs Addressed	Affordable Housing
	Funding	HOME: \$150,000
	Description	Funding will be used towards the new construction of 2 single family homes located in the 1600 block of Jefferson St. to be sold to eligible low-income households (30 -80% MFI).
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	Two (2) low- and moderate-income family (30-80%).
	Location Description	Midtown Neighborhood, 1600 block of Jefferson Street
	Planned Activities	The national objective is Low/Mod Income Housing Benefit (LMH). The project matrix code is 12, Construction of Housing.
24	Project Name	Administrative Reserve
	Target Area	CITYWIDE
	Goals Supported	Planning and Administration
	Needs Addressed	Housing Affordable Housing
	Funding	HOME: \$75,599
	Description	HOME funds will be used for the operation and administration of the HOME Program
	Target Date	12/31/2025
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	Citywide
	Planned Activities	The project matrix code is 21A, General Program Administration.
25	Project Name	City of Gary Emergency Solutions Grant Program
	Target Area	CITYWIDE

Goals Supported	Homeless
Needs Addressed	Homeless
Funding	ESG: \$298,235
Description	Provide funding for implementation of, rapid rehousing, homelessness prevention, shelter operations, HMIS and outreach for the ESG program.
Target Date	10/31/2025
Estimate the number and type of families that will benefit from the proposed activities	ESG funding will be awarded to homeless service providers to assist 100 persons with rapid rehousing, provide for operation of a homeless women shelter for stays of up to 24 homeless persons, and shelter operations for stays to 150 homeless youth for a total of 274 persons to be assisted. (0-30%)
Location Description	Citywide

	<p>Planned Activities</p>	<ul style="list-style-type: none"> • Crisis Center Inc. (Shelter Operation): ESG funds will be used for emergency shelter operations and essential services to boys and girls ages 10 to 18 who are homeless, runaways, or unaccompanied youth for up to 20 days. Approximately 150 homeless/runaway persons will be assisted.(ESG \$148,941) <p>The national objective is Low/Mod Income Clientele Benefit (LMC). The project matrix code is 03T, Homeless/AIDS Patients Programs.</p> <ul style="list-style-type: none"> • Rebuilding the Breach Ministries (Lydia House Shelter Oper.): ESG funds will be used for the emergency shelter operations of the Lydia House, an emergency shelter that provides safe and secure shelter housing for homeless women without children. Residents are housed for up to 90 days. Approximately 24 homeless persons will be assisted. (ESG \$30,000). <p>The national objective is Low/Mod Income Clientele Benefit (LMC). The project matrix code is 03T, Homeless/AIDS Patients Programs.</p> <ul style="list-style-type: none"> • NWI Reinvestment Alliance - Data Collection-HMIS: ESG funds will be used for data collection and entry into the HMIS. (ESG: \$40,000) • NWI Reinvestment Alliance – Rapid Rehousing: ESG funds will be used for financial, housing relocation, and stabilization services to an estimated 40 extremely low-income eligible households. Approximately 100 persons will be assisted (50 rental arrears, 5 security deposits, and 45 utility payments). (ESG \$56,927) <p>The national objective is LMC. The project matrix code is 05S, Rental Housing Subsidies 24 CFR 570.204.</p> <ul style="list-style-type: none"> • ESG Administration: ESG funds will be used for the overall administration of the ESG program including planning, monitoring, fiscal management, accounting, and auditing services. (ESG: \$22,367) <p>The project matrix code is 21A General Program Administration.</p>
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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

According to 2020 (and 2022 update) HUD Low/Moderate Income Summary Data, the City of Gary's population mostly consists of low to moderate-income families, (70.24%), and with the exception of two census tracts (CT 101, 125) the rest of City's census tracts are primarily occupied by low- and moderate-income households. The City's entitlement funds are typically available citywide for most activities however, several areas in the City offer opportunities for development or redevelopment. These areas, such as University Park and Midtown, will be focus of additional funding due to the opportunities.

In 2023 funds are allocated to nine (9) organizations that provide housing, homeless, and supportive services on a citywide basis. All recipients will be low to moderate-income families or individuals. The City also plans to use funds for infrastructure for one activity, Street Improvement Project, where other activities are being funded in Midtown Neighborhood. This project is qualified on an area wide basis. Further, on an annual basis, the City prioritizes the use of its CDBG funding for the development of affordable housing (including preservation and conservation) that serve low-income households. In 2023, the City will fund rehabilitation of two housing units in University Park for homeownership as well as assisting up to 20 households for homeownership.

Addressing the homeless needs remain a high priority as the needs continue to exceed available resources. These activities are expected to benefit more than 424 individuals in 2023. The geographic distribution of activities is presented in Exhibit 1. This figure shows the location of Census Tracts in the City of Gary with percentage of low- and moderate-income population and distribution of activities proposed in 2023. As a whole, 85% of CDBG funds are expected to directly benefit low- and moderate-income families. The low/mod beneficiaries for the program (HOME and CDBG) comprise of about 90% of the total beneficiaries. Overall, the City of Gary's three programs, CDBG, HOME, ESG are allocated in a way that total low- and moderate-income beneficiaries, amount to about 90%.

Geographic Distribution

Target Area	Percentage of Funds
CITYWIDE	90

Table 8 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

The 2023 Action Plan supports programs and activities which are mostly offered on citywide basis and support priorities established by the Consolidated Plan. In 2023, the City is strategically funding several activities which help in the City's targeted revitalization efforts. The targeted project, generally support broader housing and community development objectives set by the Consolidated Plan.

Housing development in Midtown and University Park are good examples of targeted neighborhoods where infill opportunities exists but such activity will also create synergy for other investments in the City while improving the neighborhood conditions. These neighborhoods in 2023 program year, will benefit from new homeownership opportunities through rehabilitation of two affordable homes in University Park as well as the construction of two new homes in Midtown neighborhood.

The 2023 funding allocation will also address underserved populations with the greatest needs including the elderly, disabled, victims of domestic violence and the disenfranchised such as the homeless and the near homeless. As a whole, about 90% (\$2,773,204) of total project funds will benefit low- and moderate-income families. For specific CDBG funds, 85% of total funds are directly targeted to benefit low- and moderate-income families or individuals (\$1,816,943).

Beyond above considerations, the City of Gary has taken into account the following considerations in making funding decisions and establishing priorities:

- Meet a goal or priority of the 2021-2025 Consolidated Plan.
- Support, supplement or are consistent with other current local planning objectives including those of the Gary Housing Authority, Continuum of Care and local Health organizations.
- Leverage available resources.
- Affirmatively further fair housing.
- Address underserved populations with the greatest needs including the elderly, disabled, victims of domestic violence and the disenfranchised such as the homeless and the near homeless.
- Have demonstrated institutional structure and collaboration in place among government, private nonprofit agencies and the private sector to maximize impacts

Discussion

Funding decisions by the City were made through an open and transparent application process where the City requested proposals from individuals, agencies and current and former funded agencies. All applications were reviewed by City staff for funding eligibility and were evaluated by staff for their impact and adherence to priorities established by the Consolidated Plan. In 2023, the City anticipates that 90% (\$2,773,204) of its program funds will be used to benefit low to moderate-income families.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City's need for affordable housing was determined during the annual planning process and notification for availability of funds by the City. The City will fund several projects all of which directly or indirectly impact provision of the affordable housing. In 2023, the City will fund the following activities:

- Housing Repair Program \$ 100,000
- Senior Rehab Program \$ 350,000
- Accessibility Program \$100,000
- Neighborhood Rehab Program \$ 125,000
- CHDO Set A-Side Program \$ 113,399
- First-Time Homebuyers Program \$ 47,600

The following Tables show specific one-year goals for the number of homeless, non-homeless, and special needs households that will be provided affordable housing during the 2023 program year. Also shown is the number of affordable housing units that will be assisted with CDBG and HOME funds.

One Year Goals for the Number of Households to be Supported	
Homeless	100
Non-Homeless	12
Special-Needs	17
Total	129

Table 9 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	100
The Production of New Units	8
Rehab of Existing Units	17
Acquisition of Existing Units	4
Total	129

Table 10 - One Year Goals for Affordable Housing by Support Type

Discussion

Affordable housing activities receive the highest portion of the City's allocation at about 36% (\$1,480,393) of the total funds. In 2023, the City will continue to fund a variety of homeownership

programs including the owner-occupied rehabilitation grant programs and various homebuyer assistance programs. Activities supporting affordable housing are expected to include:

- The City of Gary will provide assistance to about 20 families that are seeking homeownership education or seeking to finance a home or in need of homeownership counseling.
- Through the Housing Repair, Senior Repair, and Owner-Occupied Rehab programs, the City is expected to assist up to 35 households with housing repair needs of their homes.
- Through the Accessibility program, the City will assist six households with mobility disability to make their home accessible.
- The City will assist about 274 individuals or families in its homeless program. Some of these are expected to receive temporary housing assistance to prevent homelessness (100).
- The City will rehabilitate two (2) properties, acquired by NSP funds, for sale as affordable housing to low to moderate-income families. The NSP program is designed to return foreclosed, vacant and blighted homes to owner occupancy by providing funds for acquisition and rehabilitation.
- The Emergency Repair program assist the needy families in urgent need of housing repair. This program is expected to assist 12 families with emergency repairs.
- CHDO set-aside funds will be used to develop six housing units as rental or for sale homes.

All housing assistance programs will be offered to low to moderate-income households. In addition, the City anticipates to demolish about forty (40) buildings. Some of these sites, will be offered for housing construction as affordable housing in the future.

AP-60 Public Housing – 91.220(h)

Introduction

The Gary Housing Authority (GHA) provides affordable housing for about 3,091 households through its different public housing communities and voucher program. GHA housing inventory, 649 housing units, consist of senior high-rise buildings to walkup apartments and single-family homes. The Authority also provides housing through its Housing Choice Voucher (HCV) program to about 2,442 Section 8 Certificate. As a part of its inventory, the Authority also has several single-family homes in Horace Mann and Duneland communities as well as other communities that are being rented as a part of its lease to purchase homeownership program.

In 2020, GHA prepared a new five-year plan. This plan contains an expansive recovery and a host of strategies that GHA has been implementing in recent years to transform and revitalize all of its developments. This plan includes demolition and removal of several current communities and proposes to construct modern replacement communities that offer a variety of housing types and mix of uses.

The Gary Housing Authority for several years was operating under the Administrative Receivership Contract (ARC) program of HUD. In April 1, 2021, GHA received the approval by HUD for transitioning to local control. This status change, will open up major opportunities for the agency to implement its revitalization program.

Actions planned during the next year to address the needs to public housing

Part of GHA's recovering plan is removal of obsolete housing stock through demolition of several older housing developments, construction of new housing developments and rehabilitation of others. Gary Housing Authority has been approved for several Section 18 inventory removal applications. As a result, GHA has disposed and/or demolished several of its housing projects and continues to dispose several more. the following list public housing units and developments that have been identified for disposal due to obsolescence:

1. Gary Manor (24 units),
2. Concord Village 3 (21 units),
3. Delaney West (228 Units),
4. Colonial Gardens 1, 2, & 3 (151 units),
5. Miller Heights (7 units),
6. Dorie Miller Homes (268 units),
7. Delaney Community East (291),
8. Al Thomas Senior High Rise (170 units) and
9. Carolyn Mosby Senior High Rise (142 units).

The transformation has amounted to 1,302 obsolete public housing units being removed from

inventory. The removal housing units has added to the existing shortage of affordable housing in the City of Gary. To address housing needs issues, GHA is in the process of planning new mixed-finance and mixed-use developments. Additionally, the Authority engaged in placing all of its vacant public housing stock into a vacant HUD approved, undergoing modernization designation status, and applying for the HUD Capital Fund Financing Program (CFFP) to completely overhaul its remaining public housing portfolio.

In 2023, GHA will continue its transformation efforts. These activities include demolition of obsolete housing communities, and construction of new development in Downtown area, where the agency has acquired substantial amount of property. GHA will also continue to renovate the Carolyn Mosby Apartment with a new public private partnership of over \$22 million.

The City anticipates to be fully engaged and support the Housing Authority in its transformation efforts. Specific assistance the City will provide include the following:

1. Continue to support GHA in its demolition and disposition efforts.
2. Partner with GHA to serve victims of Domestic Violence to utilize Project Based Vouchers.
3. Assist GHA to acquire vacant land to build new mix income housing for all Gary residents.
4. Assist GHA in its efforts to implement its strategic plan for revitalization.
5. Assistance with demolition or disposition of several developments that GHA has plans for which include the following sites:

In addition, the City will continue its public services activities which all benefit the residents of the public housing including those of the youths and infants.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Gary Housing Authority maintains continued consultation process with its residents and regularly receives input from the Resident Advisory Board (RAB). As a part of its 2023 Annual plan, the Housing Authority solicited input from residents on the needs in the public housing communities, its operation and the community needs. According to GHA's 2023 Annual Plan, the agency expects to engage in the following activities:

- Homeownership Programs: The Authority has and is revising its HCV Administrative Plan to include the ability for voucher recipients to use their vouchers, as well as other regulation allowed, project-based programmatic initiatives (e.g., ROSS, FSS, etc.) as part of a homeownership program.
- The GHA plans to develop a new facility as Central Office Cost Center to improve its operation.
- GHA plans to construct a new maintenance facility to improvement management of its assets.
- The Authority plans to develop a community center/EnVision Center to provide permanent and

supportive services for both City and GHA residents. This Center aims to create an effective and intensive services that meet residents' needs and supports them in overcoming barriers. The Center will serve as the centralized hub for support in the following four areas; 1) Economic Empowerment; 2) Educational Advancement; 3) Health and Wellness; 4) Character and Leadership. The City provides support for these programs on as need basis.

- GHA is currently recruiting community partners to participate in its Family Self Sufficiency (FSS) Program Coordinating Committee (PCC). This committee will assist the GHA in securing commitments of public and private resources available in the community for families to achieve economic independence and reduce the dependency on welfare assistance and rental subsidies.
- In cooperation with other agencies, GHA also coordinates activities aimed at resident training for employment and homeownership. Through these programs the residents and Section 8 Voucher Program participants work with GHA staff to gain experience and acquire the requisite skills for full-time regular employment. The City provides support services to individuals enrolled in these programs on an as need basis.
- GHA continue to provide training to the Tenant Council Elections for different communities and the Resident Advisory Board.
- The City and GHA will continue to support employment of public housing residents through Section 3 program.
- The City will provide support and homeownership assistance to public housing residents on as need basis.
- Partner with local service providers that provide workshops and service that will lead to a resident becoming more self-sufficient.
- The units will be removed from the public housing inventory via Section 18 disposition applications. There currently exists units already approved under a homeownership program and these units are being disposed to potential eligible and qualified residents, and/or the public at large.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

Not Applicable.

Discussion

In order to provide modern and affordable housing units and to improve its fiscal conditions, the Gary Housing Authority prepared a new Strategic Plan in 2016. This plan establishes a 15-year process to transform the agency. The recommendations outlined in this plan cover issues related to staffing capacity, asset management and financial viability. The new 2020-2024 GHA Plan, incorporates many of the recommendations outlined in the Strategic Plan. The 2023 Annual Plan proposes to complete some of the element as they were listed above.

In 2023, the City has seen the first result of the transformation effort by the completion of Broadway Lofts project as a mixed-use development. Similarly, Carolyn Mosby Senior Apartments are under renovation, with more than \$22 million public and private investment. GHA has further completed several predevelopments plans and studies to build new mixed-use development. All these efforts aim to expand availability of affordable housing while encouraging revitalization of City of Gary.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

Early in 2023, the Continuum of Care of Northwest Indiana ceased operations. This action was precipitated by a major reduction in its staffing as well as the ill health of the Executive Director. As a result of this abrupt change, beginning in March, 2023, the Indiana Housing and Community Development Authority (IHCDA) stepped in to assist in the transition of identifying a new Coordinated Entry lead (taking the place of the CoC of NWI) and re-establishing the network disrupted with the CoC's closure. Through these efforts, the Northwest Indiana Community Action Agency (NWICA) has now assumed the lead role in the homelessness Coordinated Entry (CE) process for the region 1a.

Despite challenges stated above, the City of Gary will remain active in the regional homelessness activities. The activities include funding several programs. In 2023, about \$235,868 or 5.5% of the City's entitlement funds are dedicated to directly assisting homelessness and homelessness prevention programs. With the shuttering the CoC of NWI, the City sought assistance from a new agency, NWI Reinvestment Alliance, to carry out two homeless activities, namely Rapid Rehousing and HMIS, that were previously performed by the CoC Network. The City is also in discussion with Catholic Charities to garner support for homelessness prevention; however, availability of match funding is a challenge for such program.

Above notwithstanding, the following activities will be funded to address homelessness in the City of Gary in 2023:

- A portion of CDBG entitlement funds for program administration and homeless coordination and prevention (\$22,367)
- A large portion of ESG funds (79%) will be used for direct rapid rehousing and shelter services (\$235,868)
- Other federal resources will support maintenance of HMIS and support existing shelter and homelessness agencies and outreach (\$40,000)
- Local funds from the City and its partner agencies, i.e., Calumet Township Trustee.
- State funds provided through various programs related to social and family services.
- Other services, such as CE, supportive services and housing will be continuing by the new lead agency and its partner agencies such as Edgewater and others to address the needs of the homeless.

In addition, three other CDBG funded programs, Senior Housing Rehab (\$350,000), Accessibility Program (\$100,000), and Gary Human Relations Commission Fair Housing program (\$85,000) are funded which support people with special needs and to reduce or prevent homelessness.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

In 2023, funded activities will support all of the identified homeless goals in the plan through allocation of funds from CDBG, ESG, and local funds:

- The Crisis Center is expected to provide assistance to 150 runaway and homeless youth in need of shelter.
- Rebuilding the Breach Ministries will provide housing services to 24 homeless women in need of shelter.
- The Rapid Rehousing Program through NWI Reinvestment Alliance will assist up to 100 homeless or at sever risk households with assistance.
- NWI Reinvestment Alliance to provide Data Collection and HMIS).
- Complete preliminary plans for development of a new homeless shelter funded by HOME ARP funds. This plan also includes providing funding for supportive services to address the needs of homeless for the next several years.

These activities collectively are expected to benefit 274 homeless individuals or families.

The outreach activities will be coordinated by the Northwest Indiana Community Action Agency (NWICA) and partner agencies. NWICA will assess the homelessness in the City and assist those in the risk of homelessness. While NWICA continues to become fully operational, the City's partner agencies will continue to provide outreach services and conduct assessment on a regular basis.

- In 2023, the City will provide operational support to two agencies providing shelter services to youths and adult women. Rapid rehousing assistance is also provided through NWI Reinvestment Alliance.
- With the onboarding of NWICA, focus on current assessment process and outreach is expected to expand by utilizing the Coordinated Entry System (CES) to form a robust collaborative, no-wrong door network, that connects homeless individuals and households to services and housing including those of supportive housing. (Please see the current CE program components and the list of participating locations for entry assessment in the City of Gary.)
- The City will continue in 2023 its cooperation with IHCD, NWICA, and others to organize the Regional Planning Council for the formation of a solid planning, outreach, networking and advocacy for the region. . Homelessness prevention objectives in 2023 include; 1) Support NWICA to maintain coordination; 2) Provide support to Regional Planning Council to ensure outreach, reduce risk of homelessness; and 3) Support Rapid Rehousing assistance activities.

IHCD is currently assisting the NWI Community Action to fully become organized as the Region 1a lead coordinating agency. The NWI Community Action, is expected to continue to meet on a regular basis with its partner agencies, to coordinate outreach, and assess required needs. The agency will further

convene case conference, provide training, oversee data quality, and help establish regional priorities and goals. The other CE providers work cooperatively with and under NWICA to make sure everyone is assessed or diverted to appropriate resources. The City expected to participate in the outreach activities through partner agencies that are funded by City of Gary as well as RPC. . IHEDA is also providing support to organize a new Regional Planning Council (RPC). In fact, the first meeting of the NWI Action Council was convened earlier this month . A second meeting is planned for September 21, 2:00 p.m. IHEDA is also meeting with one member of the Council, Gary Commission for Women, to ask the agency to become the Council's Chair. Once this process is fully underway, the City expects the Council to lead the discussions with local and regional service providers to ensure availability of adequate coordinated outreach and assessment. In the interim, the Region 1a has been having monthly Coordinated Entry case conferencing sessions. These sessions are currently led by IHEDA staff Morgan Kochan and Liz Greene.

Addressing the emergency shelter and transitional housing needs of homeless persons

ESG funding will provide assistance for emergency and transitional housing needs of the homeless in the City. NWI Community Action (NWICA) is expected to engage in assessing the programs that currently receive ESG funding to ensure proper allocation of funds among different service providers. In 2023 the City will fund three different activities that address the homeless needs for shelter. These activities will benefit 274 homeless families and individuals.

- Crisis Center, Inc. (Shelter Operations) \$148,941
- Rebuilding the Breach Ministries (Lydia House Shelter Operation.) \$30,000
- NWI Reinvestment Alliance (Rapid Rehousing); \$56,927
- NWI Reinvestment Alliance (Data Collection, HMIS); \$40,000

In addition to funding programs which support emergency shelter needs, , the City will complete plans for development of a new homeless shelter funded by HOME ARP funds. This plan includes providing funding for supportive services to address the needs of homeless for the next several years (\$360,000). In addition, the plan will allocate one million dollars to create affordable rental housing and another \$650,000 toward the cost of a new, "low-barrier" shelter.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

In 2023, the City of Gary, will focus on rapid re-housing and homeless prevention efforts to assist persons who are experiencing homelessness. The City will allocate 19.1 percent of its ESG funds towards rapid rehousing and prevention programs. The City also collaborate with housing providers to ensure

availability of permanent support housing for the homeless. The activities that assist the homeless include:

- NWI Reinvestment Alliance(\$56,927) will manage the City's Rapid Rehousing program which will provide assistance to individuals and families, including those of recently discharged. A total of 100 individuals or families will be assisted.
- Crisis Center (\$148,941) to provide shelter services to approximately 150 runaway and homeless youths in need of shelter.
- Engage in development of new shelter and fund supportive services funded by HOME ARP.
- The City will work with local organizations which provide housing services to the Veterans, i.e., CHDO's, Housing Authority, and the youths, i.e., Crisis Center, to ensure availability of permanent supportive housing and services.
- Engage NWI Community Action to participate and provide input in the decisions for allocating funds for homeless service providers.
- Collaborate with the NWI Community Action to continuously update its assessment plan. This plan aims to provide a coordinated process for housing the homeless including establishing a priority vulnerability list, that identifies chronically homeless and those families and/or individuals who have episodic homelessness.
- The City will continue to collaborate with multiple organizations that provide services, assessment, permanent supportive housing for the chronic, mentally ill and the Veterans some of which are reported below.
- Edgewater System for Balanced Living operates a Rapid Access Center in Gary with the goal of early intervention, assessment and prevention. The Center, open 24 hours, offers the following services:– Assessment of resources, family support and community placement
 - Crisis Stabilization
 - Discharge Planning
 - Subacute Stabilization
- The Center has developed partnerships with other service providers which enable the agency to make proper referrals for the homeless to transition to permanent housing.
- The City will collaborate with Edgewater to continue to provide permanent supportive housing to individuals and families in need of assistance. The agency provides housing, particularly those with mental illness, to receive proper medical needs and supportive housing.
- The Veterans Village, will provide permanent supportive housing, 44 one-bedroom units, for Veterans who find themselves homeless with dual diagnosis, mental illness, substance abuse, and or chronic homelessness.
- Other programs available in the City include Village of Hope with 40 units, that is operated by Missionaries of Charity Shelter. This facility provides supportive housing for woman and families. Similarly, Gateway project, provides permanent supportive housing for individuals and families in scattered sites who have mental illness and or substance abuse (up to 50 units).

Helping low-income individuals and families avoid becoming homeless, especially extremely

low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Several agencies, private and public, in the broader Gary area offer homeless prevention services that include mortgage assistance, rental assistance, and utility payments. Catholic Charities support homeless prevention by providing utility payments, or rental assistance. Similarly, Calumet Township Trustee provides limited rental, utility and mortgage assistance to low-income families. Both of these agencies primarily focus on very low and extremely low-income families. Other private and public agencies within the county offer financial and family counseling and advocacy services to assist individuals and families who are at risk of becoming homeless. Funding for these services comes from a combination of federal, state, local, and private sources and some that provide services in Gary are regularly funded by the City. A good example is the Gary Human Relations Commissions' Fair housing and Counseling program where the Commission provided fair housing counseling. Similarly, the City continues to collaborate with the Gary Housing Authority in supporting their program aimed at rapid rehousing and prevention of homelessness as outlined in GHA's 2023 Annual Plan.

To reduce the risk of homelessness, the City will fund four activities that will directly or indirectly assist individuals and families to avoid homelessness. These programs are:

- Emergency Repair Program (\$125,000), which will reduce the risk of homelessness for those low-income families that are victims of unexpected events i.e., HVAC, water heater replacement, and potentially hazardous electrical and plumbing repairs.
- Gary Human Relations Commission Fair Housing (\$85,000) will guide families in need of case management to prevent eviction or resolve tenancy issues with landlords, and provide employment assistance with the goal of helping clients to maintain jobs and staying self-sufficient.
- Through public services and housing programs, the City will fund activities which provide health services (such as Gary Health Department Sexually Transmitted Diseases Program \$49,962) and Youth Service Bureau which provides a variety of programs to low-income youths including after school program which enable their parent to maintain jobs.

Discussion

Despite challenges imposed by the closure of CoC Network NWI , during the third year of the program, the City aims to fund activities that collectively will support homeless objectives outlined in the Consolidated Plan. A review of the PIT Count for Region 1a, conducted in January 25, 2023, shows that the number of homeless has substantially declined in all categories in comparison with 2022. The PIT homeless count for 2023 reports the total number of homeless households and person as being 106 and

161. Among these, about 36 households and 43 persons were unsheltered. While the number of homeless have declined regionally, a plan prepared by the City, earlier this year for allocating HOME ARP funds, shows a substantial need for case management, child care, food access and transportation, in the City. To address these needs plan proposes development of a new shelter in the City and funding supportive services to address the needs.

The onboarding of NWICA as the lead coordinating agency, opportunity has emerged to review the overall Coordinated Entry System and seek practical options which ensure robust coordination and sustainable collaborations among all member agencies and service providers in Region 1a. The City is eager to support such efforts and will continue to fund service providers which provide shelter and support services to the homeless. The City will further fund programs that prevent homelessness or provide housing assistance to reduce incidents of homelessness. Activities such as Emergency Repair program or Rapid Rehousing and Fair Housing, aim to prevent homelessness or reduce the risk of homelessness.

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

The primary barrier to affordable housing is the growing disparity between incomes and housing cost despite Gary having one of the lowest median housing costs in the region. Lack of income growth continues to be a major barrier to affordability despite relatively availability of low-cost homes. The City's lack of growth both in population and income, has made the market conditions very unique. While there are a substantial number of low-cost housings in the City, the affordability for those with low- and moderate-income population remains difficult to attain.

The City of Gary prepared a new Analysis of Impediments to Fair Housing (AI) in 2022. This Analysis identified seven fair housing impediments in the City of Gary. These impediments are:

1. Insufficient Income Growth
2. Neighborhood Obsolescence.
3. Dual Housing Market
4. Shortage of Affordable Housing Units
5. Lending Practices
6. Accessing to Fair Housing Information
7. ADA Compliance.

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The City in recent years has made extraordinary efforts to provide assistance for affordable housing development. These efforts have improved to some degree the availability of affordable housing, but they are not adequate. The City recently adopted a new Comprehensive Plan. This plan supports a wide range of policies aimed at revitalization and inclusionary zoning. The City currently is also in the process of updating its zoning code. Despite these efforts, residential investment in the City remains limited to larger multi-unit developments that are typically subsidized with public funds and are generally rental in character.

In its third year of the plan, the City will support activities that will enhance home ownership and preserve the character of the City's neighborhoods. The City will further attempt to address the needs of the existing homeowners particularly those who cannot afford the cost of maintaining their homes. The City will carry out the following activities which directly or indirectly support removal of some of the negative effects and barriers to affordable housing:

- Emergency Repair Program \$ 125,000
- Neighborhood Rehab Program \$ 125,000
- Homeownership Opportunity Network (HON) \$ 30,000
- Neighborhood Conservation/Code Enforcement \$ 248,295
- Gary Human Relations (Fair Housing & Public Education & Outreach) \$ 85,000
- Gary Dept. of Redevelopment Division (Demolition) \$ 400,000

The Housing Repair Program will assist existing homeowners to upkeep their home, maintain the neighborhood character and remove blighting influences. Twelve (12) households will be assisted through this program. The Demolition program will remove dilapidated homes and make the sites available for construction of new homes thus expanding growth opportunities. Similarly, Neighborhood Conservation aims to maintain neighborhood character and prevent declining influences of blight. Lastly, Fair Housing efforts will aim to educate realtors, developer and land lords with fair housing requirements and indirectly removing barriers for renters and homebuyers . As a whole these programs are expected to benefit more than 1,274 individual or households.

Discussion:

With the advent of the new Comprehensive Plan, and the Housing Authority's new initiative to promote mixed use communities, new opportunities have risen which can expand housing opportunities as well as promoting revitalization. These efforts, could result in redevelopment of several existing vacant parcels and promote diversity of mixed use and mixed income communities.

In its third year of the Consolidated Plan, the City will continue its efforts to remove barriers to affordable housing by supporting a variety of activities in different parts of the City to redirect the redevelopment efforts towards a revitalization outcome. These activities, collectively are expected to ensure a healthy return on residential investment in the City, however, the issue of investment, without substantial public subsidy will remain a major challenge.

AP-85 Other Actions – 91.220(k)

Introduction:

This section of the Annual Action Plan describes Gary's planned activities to implement the following strategies as outlined in the Strategic Plan:

- Obstacles to meeting underserved needs
- Foster and maintain affordable housing
- Evaluate and reduce lead-based paint hazards
- Reduce the number of poverty-level families
- Develop institutional structure; and
- Enhance coordination.

Actions planned to address obstacles to meeting underserved needs

The primary obstacle to meeting underserved needs of low- and moderate-income populations in Gary continues to be the magnitude of the needs and availability of funds to address them. Organizations serving these populations continue to experience reductions in funding from both governmental and private sources.

The City of Gary's entitlement funding levels have not kept up with the growing needs. This trend is expected to continue in 2023 despite a slight increase in the overall funding levels (HOME and ESG). Mirroring this trend is the increasing difficulty in leveraging funds through state and private resources, which have also been strained in recent years. Obstacles that can be identified for the underserved community in the City include:

- Reduced funding from federal, state and other sources due to inadequate revenue; and the housing scarcity.
- High cost of housing and lack of income in Gary which increases the difficulty of meeting affordable housing needs (According to HUD most recent income data, the City's low- and moderate-income population continue to increase. According to HUD Census data, the City's low and mod population is about 70.24%)
- High rates of unemployment, underemployment continue to strain the ability to meet affordable housing needs; and
- Credit crisis has limited availability of capital to develop housing for low- and moderate-income households and special needs groups.

Despite these challenges, the City of Gary in 2023 will address obstacles by focusing on programmatic and administrative opportunities which include the following:

- Seek other funding opportunities including ARPA funds or others for affordable housing.

- Community Development staff will continue to research the availability of funding resources and will use proactive approaches toward future applications for potential federal and state leverage funds; this will assist the City to strategically place future activities in line to address obstacles.
- The City will seek additional private and public partners to leverage CDBG funds to create a larger pool of resources for the underserved. In 2023, this pool consists of at least four different agencies targeting primary minority and underserved population. These agencies will provide a host of services ranging from housing counseling to construction of affordable housing and health and educational services.
- The City is in the process of completing a plan for allocating and funding several projects that will be funded with the HOME-ARPA program funds. It is anticipated that some of these funds will be allocated toward development of affordable housing.

Actions planned to foster and maintain affordable housing

As stated throughout this Plan, affordable housing will continue to remain a high priority objective in 2022. Accordingly, the City prioritizes the use of its funds for the preservation and development of affordable housing that serve low-income households and to addressing homelessness. For the program year 2022, the City anticipates providing direct financial assistance to five programs and benefiting approximately 43 households through the following housing programs.

- Emergency Repair Program (\$125,000)
- Neighborhood Rehab Program (\$125,000)
- CHDO Set a-side (\$113,399)
- Affordable Housing Program (369,394)
- First-Time Homebuyer Program (\$61,403)

The City will further continue to collaborate with the Gary Housing Authority to support GHA’s lease purchase program for its single-family housing stock. For further discussion of affordable housing, please refer to AP-55 Affordable Housing.

Actions planned to reduce lead-based paint hazards

The City has addressed the issue of LBP hazards by making lead hazard information available to a variety of groups and families through several outreach and education activities. Additionally, all housing units that are substantially rehabilitated with CDBG or HOME funds are subject to LBP compliance requirements. Each property will be assessed and lead clearance will be performed by a certified risk assessor, certified lead-based paint inspector or clearance technician before the rehabilitation project can be completed. During program year 2023, the City estimated that up to seventeen (17) housing units will be assessed for lead abatement or removal through Housing Repair, Neighborhood Rehabilitation and CHDO programs.

The Gary Health Department Lead Poisoning program will further continue to provide the required monitoring and screening of children in 2023. Children identified at risk of poisoning or already exposed will be reported and followed up for treatment and observation. The Department will typically report incident data to appropriate agencies and the City of Gary. In 2023, up to 200 children are expected to be tested and assisted.

Actions planned to reduce the number of poverty-level families

The City of Gary aims to foster conditions by which reduction in the number of poverty-level individuals and families can be realized. According to most recent data, 2023, from the Census Bureau, the City continues to face a high poverty rate with more than 32% of its population living below poverty. The poverty level for families is reported by the Census Bureau as being about 41%. A large portion of these families are families with related children where poverty rates are about 51.3%.

In 2023, the City will target CDBG and other local resources to activities that provide support services and affordable housing to reduce cost burden. The City will fund five activities at about \$692,049. These activities will help reduce poverty or create opportunity for economic well-being. Collectively these activities are expected to assist more than 2,386 individuals or families. The City's housing programs also impact poverty as they reduce cost burden particularly for seniors and low-income families. Rental assistance will reduce poverty level for those in desperate need of housing assistance.

- Gary Health Department (Sexually Transmitted Diseases) (\$49,962.)
- Gary Human Relation Commission, Fair Housing and Employment Rights, (\$85,000)
- Gary Youth Services Bureau (\$87,087)
- Senior Rehab Program (\$350,000).
- Meals on Wheels of NWI (\$120,000).

Actions planned to develop institutional structure

The Department of Community Development has developed cooperative relationship with local not-for-profit agencies, neighborhood organizations, businesses, and private entities in the City as well as regionally. These relationships exist in the areas of planning, housing, homelessness, redevelopment, brownfields, job training, business development, and in social services. In 2023, the City will rely on several agencies and organizations to carry out its activities. These organizations range from public and non-profit agencies to private development entities involved in a variety of housing, social services and community development activities.

Housing assistance to lower income persons and special populations is provided through several organizations. The activities that will be carried out in 2023 include:

- City of Gary Housing programs receive funds annually to deliver a variety of housing

rehabilitation services to lower-income households.

- HOME funds are made available for use by nonprofit organizations and private entities to construct or purchase/rehabilitate homes for resale and occupancy by lower-income persons.
- Neighborhood improvement projects, including demolition and spot demolition are carried out throughout the City by the Redevelopment Department.
- Public housing revitalization activities are carried out by the Gary Housing Authority. The City will continue to collaborate with GHA to expand affordable housing.
- The City maintains strong relationships with many agencies that are members of the Continuum of Care Network. In 2023 the City will fund two activities to ensure coordination of homeless outreach and providing rapid rehousing services. In addition, the City will fund two other homeless and shelter services agencies that serve the homeless with shelter and essential services through the Emergency Solutions Grant and other resources.

To expand outreach, the City annually invites different agencies to participation in the City's Community Development program. This will allow the City to expand opportunities for partnership and also to evaluate needs and align budgeting with such needs. Lastly, in order to strengthen institutional structure, the City seeks input through an annual survey from all subrecipients or potential new agencies and the residents to get input. The City typically reviews these surveys and considers them in program development and funding allocations.

Actions planned to enhance coordination between public and private housing and social service agencies

The lead agency for the Consolidated Plan is the Community Development Department of the City of Gary. The Department oversees administration, organization and preparation of the Action Plan and will coordinate activities of the public, private and nonprofit entities through which it will carry out the proposed programs.

In 2023, the City will continue to work with the local developers, financial institutions, non-profits, Housing Authority and other entities to ensure that new, affordable housing units are produced on a regular basis. Similarly, the City will work with four different agencies that provide a variety of social and support services. The City's primary goal in these efforts will be to encourage partnership, enhance collaboration, and improve service delivery. To this end, the City will engage in the following activities:

- Through public meetings and hearings on projects and applications for funding, the City will encourage a forum where private and public entities can discuss comprehensive planning, community development, housing, and other issues.
- Conduct annual survey to get input from funded agencies, the residents and identify opportunities and needs.
- Conduct networking meeting with all subrecipients to encourage partnership and collaboration. (Annually)

- Provide regular technical assistance to agencies in order to ensure orderly progress for the activities.
- Through the efforts of the Gary Human Relations Commission, maintain communications with private housing providers and financial institutions.
- Participate and interact with community groups (i.e., CDC's) and others that provide housing and supportive services to low-income residents.
- Continue collaboration with the Gary Housing Authority to preserve and expand affordable housing particularly for those with low income. These efforts will particularly focus in Downtown and Emerson neighborhoods.
- Meet with shelter providers to get input about needs and distribution of funds (Annually)
- Through the efforts of the Continuum of Care Network, the City will coordinate homeless activities on a regional basis to assure availability of shelter and homeless services and to reduce gaps in the system.
- Through an expanded HMIS program, integrate activities of homeless shelter and those providing assistance to the homeless or at-risk families.
- Meet with other social and community groups to discuss activities on a regular basis.

During the 2023 program year, the City further will collaborate with different organizations and other City agencies to address neighborhood conditions, code enforcement, brownfields, demolition as well as issues related to neighborhood revitalization.

Discussion:

The City and its program partners will continue to work together to address the many social and economic needs of the community. Through collaboration, the leveraging of resources, and improved tracking of needs, the City aim to better meet the needs of the community, particularly those with low and moderate income and underserved population. The result of community survey indicates the greatest need is observed in the provisions of public services due to needs. While the City aims to address these needs by building a greater safety net, the funding remains to be a challenge that the City aims to expand by building stronger partnership with other institution.

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

The City of Gary receives annual entitlement funding for Community Development Block Grant (CDBG), Home Investment Partnership Program (HOME) and Emergency Solutions Grant (ESG) Funds. The City will use these funds to carry out a variety of programs consisting of public services, housing, public infrastructure Improvements, Homeless, and community improvements.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	90.00%

HOME Investment Partnership Program (HOME)

Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is

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as follows:

Not Applicable

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The HOME funds provide for purchase or rehab assistance to homebuyers, homeowners, or investors. The resale of all HOME assisted properties during the required affordability period will be governed by the recapture guidelines in accordance to provisions of CFR 24, Section 92.253(a)(5) of HUD. This provision allows participating jurisdictions to impose either resale or recapture requirements on properties sold that have been assisted with HOME funds. The City of Gary will utilize the recapture method. A full copy of policies and procedures are attached as Exhibit 2, Resale/Recapture.

Periods of Affordability: The recapture provision will ensure that each housing unit will remain affordable for a period of time determined by the recapture schedule below, established in accordance with 24 CFR 92.254. The City of Gary's has adopted HOME Affordability Limits policy. The document containing these policies are attached as Exhibit 2 Home Affordability Limits.

Net Proceed: The "net proceeds" for this purpose is defined as the sales price minus superior loan repayment (other than HOME funds) and any closing costs. To the extent that net proceeds are available at closing, all or a portion of the HOME funds are due and may be recaptured.

HOME Amount per Unit Minimum	Period of Affordability in Years
Less than \$15,000	5
\$15,000 - \$40,000	10
Over \$40,000	15
New Construction	20

HOME RESALE/RECAPTURE GUIDELINES ARE CONTINUED BELOW

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The City of Gary's has adopted HOME Affordability Limits policy. The document containing these policies are attached in Exhibit 2 Home Affordability Limits. In determination of the maximum value of purchased properties, the City of Gary will utilize 95% of the maximum value permitted as determined by HUD for 2023 as outlined in the following Table.

2023 Purchase Price Limits, Effective July 1, 2023

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

Not Applicable. The City of Gary will not use HOME funds to refinance existing debt secured by multifamily housing.

5. If applicable to a planned HOME TBRA activity, a description of the preference for persons with special needs or disabilities. (See 24 CFR 92.209(c)(2)(i) and CFR 91.220(l)(2)(vii)).

Not Applicable

6. If applicable to a planned HOME TBRA activity, a description of how the preference for a specific category of individuals with disabilities (e.g. persons with HIV/AIDS or chronic mental illness) will narrow the gap in benefits and the preference is needed to narrow the gap in benefits and services received by such persons. (See 24 CFR 92.209(c)(2)(ii) and 91.220(l)(2)(vii)).

Not Applicable

7. If applicable, a description of any preference or limitation for rental housing projects. (See 24 CFR 92.253(d)(3) and CFR 91.220(l)(2)(vii)). Note: Preferences cannot be administered in a manner that limits the opportunities of persons on any basis prohibited by the laws listed under 24 CFR 5.105(a).

Not Applicable

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

The City of Gary's has adopted written standards for providing ESG assistance. This documents is attached as Exhibit 3.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

All projects receiving funding will utilize the HMIS system as coordinated by the NWI Community Action. The data from these activities are entered into the System to ensure proper assessment and reporting. The NWI Community Action, in cooperation and input from the City of Gary and its membership has established a centralized coordinated assessment system or Coordinated Entry System.

The Coordinated Entry System (CES) is governed by a 10-member committee appointed by the member organization's supervisors. The NWI Community Action is expected to regularly convene and engage in community and system-level coordination, ranging from monthly meetings with Regional Planning Council to broader activities at the regional level with the membership.

The current membership consists of the following organizations:

1. St. Jude House
2. Regional Health System
3. Edgewater for Balanced Living
4. Sojourner Truth House
5. Haven House
6. Volunteers of America

The Coordinated Entry System (CES) for Single Adults, Youth, and Families coordinates supportive services and housing resources across Lake County, Indiana to form a collaborative, no-wrong door network that connects homeless individuals and households to services and housing. The Coordinated Entry System (CES):

- Creates many front doors, to the homeless services delivery system, making all participating providers a point of access;
- Lifts the burden of navigating a complex maze of resources from the person experiencing homelessness by providing someone to help navigate the housing process;
- Encourages resource coordination among service providers so that people receive the right type and level of services and housing supports for their needs;
- Ensures strategic use of limited resources; and
- Distributes resources more equitably across the county

The Coordinated Entry System (CES) was established where Adults/Families could access CES for Single Adults through access centers and crisis housing. Outreach teams can also serve as entry points. Youth can access Youth CES through drop-in centers and crisis housing.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

The City of Gary funding application process is open to all entities including non-profits and faith-based organizations. The City publicly announced on October 17, 2022 availability of funding and the application process. Applications were accepted until November 16, 2022. Supplementing this announcement, the City published public notices in local news media outlet. The City further emailed notifications to previous recipients, non-profit organizations, community-based centers, faith-based organizations and potential stakeholders using its large email bank, to inform these organizations of availability of funds.

A total of two applications for ESG funding were received by the City. The applications were reviewed by the Community Development Application Committee for eligibility, conformance with the program's requirements, qualifications of applicants, availability of matching funds and related considerations. The City further seeks input from stakeholders and Continuum of Care Network (NWI Action Council), including a homeless or formerly homeless person, before the public meeting for the selected applications. The meeting occurred on February 28, 2023. No application was denied.

The ESG funds for 2023 will be allocated as follows:

- Crisis Center, Inc. - \$148,941
 - Rebuilding the Breach, Lydia House - \$30,000
 - Reinvestment Alliance - \$40,000 Data Collection (HMIS)
 - Rapid Rehousing - \$56,927
 - Administration - \$22,367
4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The City of Gary met the homeless participation requirement with a consultation meeting on February 28, 2023 with the Continuum of Care Network of NWI and a formerly homeless individual.

5. Describe performance standards for evaluating ESG.

The City of Gary's has adopted written performance standards for providing ESG assistance. The performance standards were developed in collaboration with the Continuum of Care Network which is the coordinating body for the State's Region 1a. The document containing the performance standards and policies are attached as Exhibit 3.

A review of the PIT Count for Region 1a, conducted in January 25, 2023, shows that the number of homeless has substantially declined in all categories in comparison with 2022, 161 vs. 272 in the region. While the number of homeless persons has declined regionally, a plan prepared by the City, earlier this year for allocating HOME ARP funds, shows a substantial need for case management, child care, food access and transportation, in the City. Despite reduction in homeless number, , a capacity decline has not been reported except that Rainbow-Ark shelter is currently undergoing renovation and no services are provided. The facility has 14 units (28 beds).

Attachments

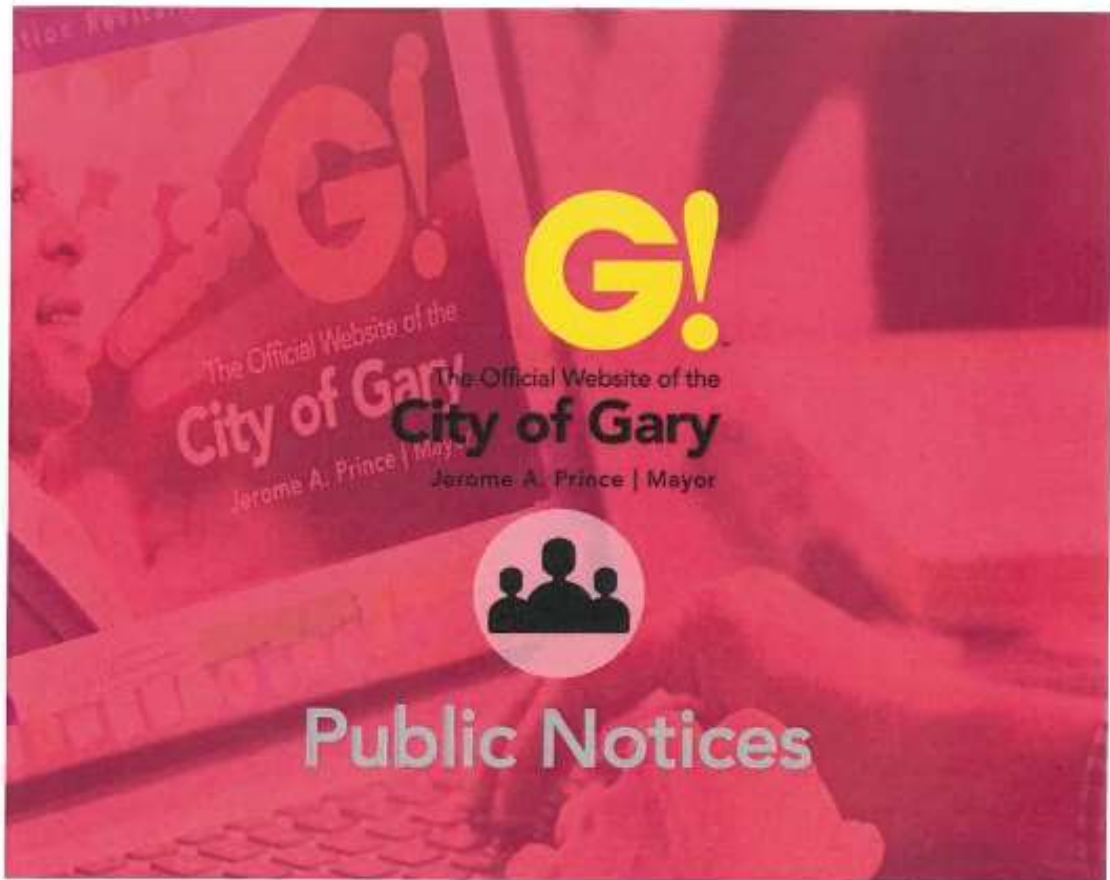
Citizen Participation Comments

**CITY OF GARY
NOTICE OF PUBLIC HEARING
2023 ANNUAL ACTION PLAN**

The City of Gary's Community Development Department has scheduled a Public Hearing to present a summary of the 2023 Annual Action Plan. The Plan will include the proposed use of federal grant dollars from the Community Development Block Grant (CDBG), Emergency Solutions Grants Program (ESG), and HOME Investment Partnerships Program (HOME) that affect our community. The public hearing is open to the general public and all citizens are invited to attend and provide comments and/or suggestions. The meeting will start promptly at 4:30 P.M. on the date and at the location listed below:

**Tuesday, July 11, 2023
The Cleo Wesson Council Lounge
City Hall
401 Broadway, 2nd Floor, Room 206
Gary, IN 46402**

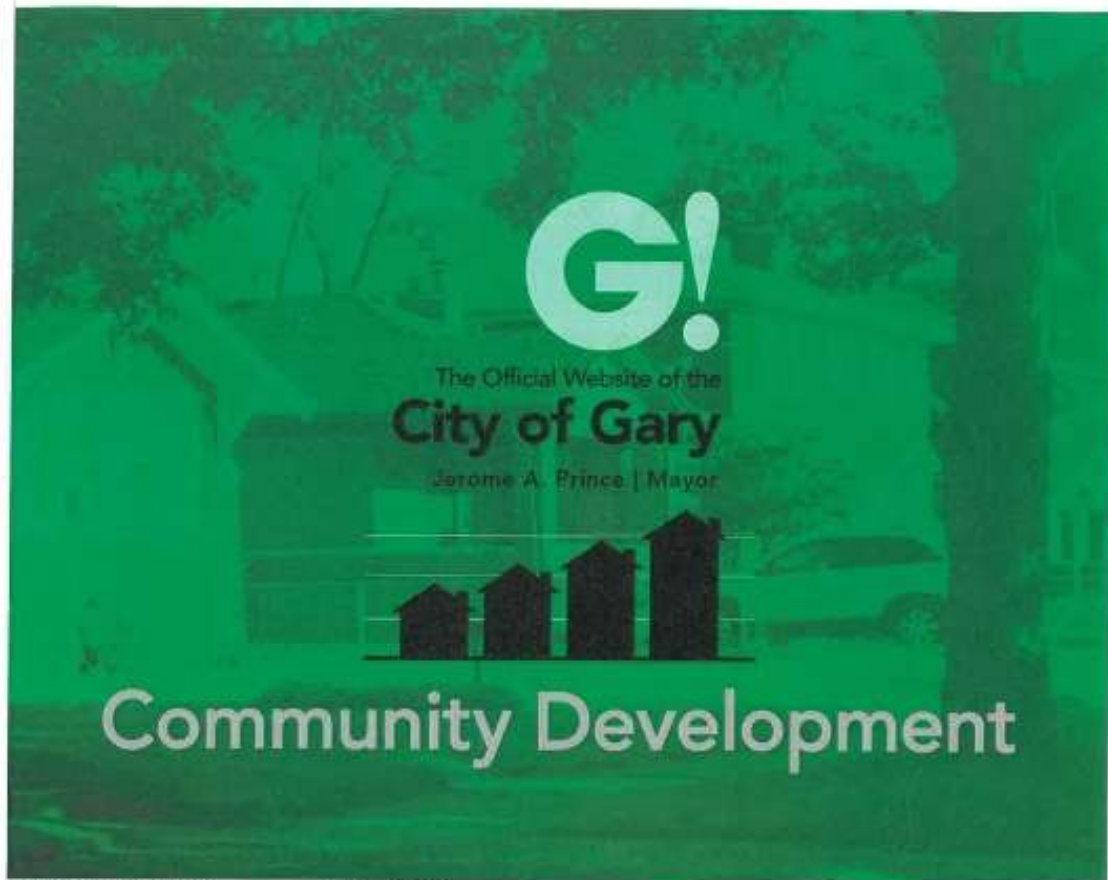
A Draft of the Plan will be made available for review and comment on July 12, 2023 at the City of Gary Community Development Department, 401 Broadway, Suite 300, Gary, IN 46402. There is a 30-day public review and comment period. Survey forms will be made available to citizens in an effort to procure written comments and/or suggestions and may be submitted in person at the public hearing, emailed to kmcclam@gary.gov or mailed to Ms. Kimberley McClam, City of Gary Community Development Department, 401 Broadway, Suite 300, Gary, IN 46402. Comments received will be incorporated into the final document and submitted to the U.S. Department of Housing and Urban Development (HUD). Please contact Ms. McClam for any other additional information. Special Accommodations: Pursuant to our fair housing and civil rights requirements and procedures for effective communication, accessibility and reasonable accommodation, persons with disabilities or limited English proficient (LEP) residents who wish to participate in this hearing may make requests for accommodation such as a language interpreter, alternately formatted materials, auxiliary aids, sign language, or other by contacting Ms. McClam at (219)881-5075 or kmcclam@gary.gov at least five (5) days prior to the meeting.



2023

- [NOTICE: CITY OF GARY NOTICE OF PUBLIC HEARING 2023 ANNUAL ACTION PLAN](#) - June 27, 2023
- [NOTICE: Gary Redevelopment Commission to hold Public Hearing on June 27, 2023](#) - June 25, 2023
- [NOTICE: June 8, 2023 BZA Meeting is CANCELLED](#) - Jun 2, 2023
- [NOTICE: City of Gary Department of Public Works seeking Community Input on 5 Year Master Plan](#) - May 22, 2023
- [NOTICE: Planning Commission Meeting May 18 is CANCELLED](#) - May 18, 2023
- [NOTICE: Substantial Amendment to the 2019 ANNUAL ACTION PLAN](#) - May 9, 2023
- [NOTICE: Revised Planning Commission Meeting Schedule for FY 2023](#) - March 29, 2023
- [NOTICE: Revised Board of Zoning Appeals Meeting Schedule for FY 2023](#) - March 29, 2023
- [NOTICE: CITY OF GARY PUBLIC WORKS VENDOR PACKAGE AVAILABILITY](#) - March 15, 2023
- [NOTICE: The Gary Redevelopment Commission to hold a SPECIAL MEETING on March 1, 2023](#) - February 24, 2023
- [NOTICE OF PUBLIC HEARING CITY OF GARY COMMUNITY DEVELOPMENT DEPARTMENT 2022 DRAFT CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT \(CALENDAR MARCH 13, 2023\)](#) - February 24, 2023
- [NOTICE OF PUBLIC HEARING HOME-ARE DRAFT ALLOCATION PLAN ON MARCH 13, 2023](#) - February 24, 2023
- [NOTICE: HOME-ARE DRAFT ALLOCATION PLAN VIRTUAL PUBLIC HEARING](#) - January 13, 2023
- [NOTICE: January 2023 BZA and Plan Commission Meetings CANCELLED](#) - January 9, 2023
- [NOTICE: 2023 Schedule for City of Gary Planning Commission Meetings](#) - January 9, 2023
- [NOTICE: 2023 Schedule for City of Gary Board of Zoning Appeals Meetings](#) - January 9, 2023

2022



Public Hearings and Workshops

Public Hearings

[NOTICE OF CITY OF GARY NOTICE OF PUBLIC HEARING 2021 ANNUAL ACTION PLAN - June 27, 2023](#)

[NOTICE OF PUBLIC HEARING CITY OF GARY COMMUNITY DEVELOPMENT DEPARTMENT 2022 DRAFT CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT \(CAPER\) ON MARCH 13, 2023 - February 24, 2023](#)

[NOTICE OF PUBLIC HEARING HOME-ARP DRAFT ALLOCATION PLAN ON MARCH 13, 2023 - February 24, 2023](#)

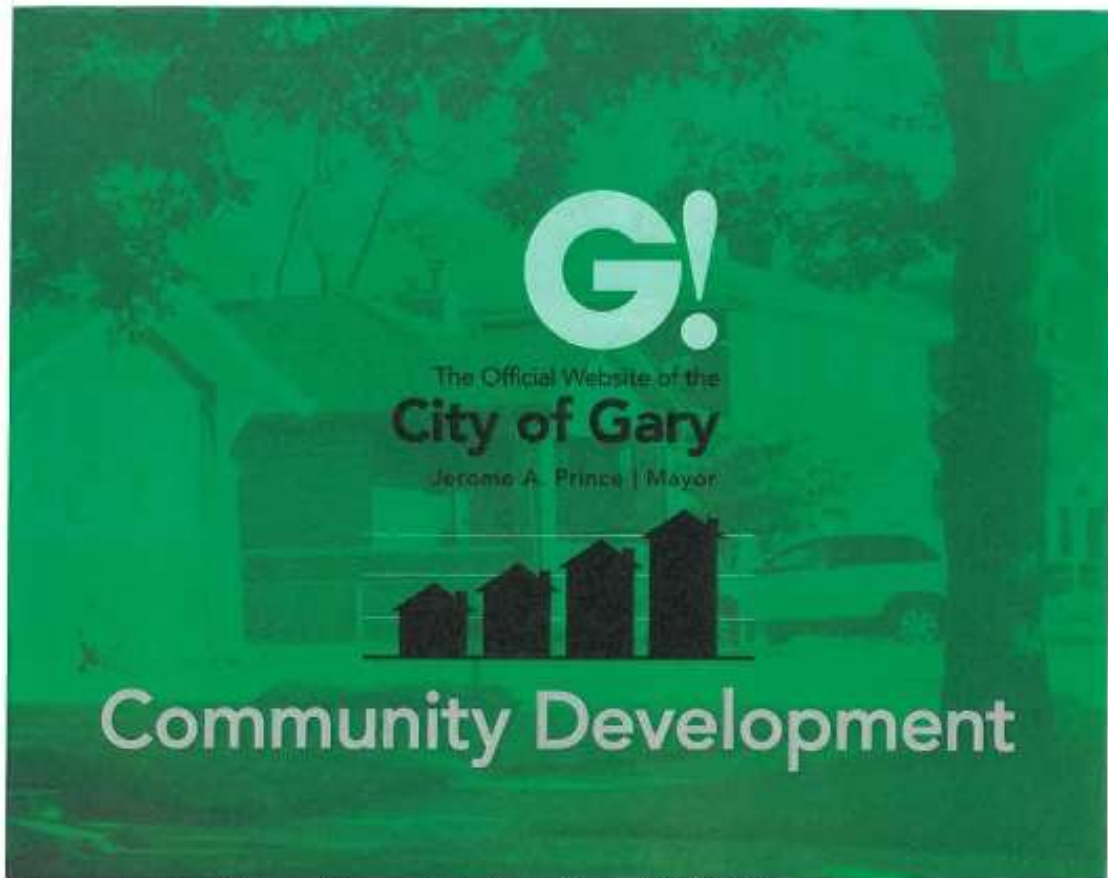
[HOME-ARP DRAFT ALLOCATION PLAN VIRTUAL PUBLIC HEARING - January 13, 2023](#)

[CITY OF GARY, INDIANA NOTICE OF SUBSTANTIAL AMENDMENT TO THE 2019 ANNUAL ACTION PLAN CDBG CARES Act /CDBG-CV/20/28/2022 - October 25, 2022](#)

Public Hearing to be held June 27, 2022, 4:30 p.m., Virtual Zoom, which can be found here: [CITY OF GARY, INDIANA NOTICE OF SUBSTANTIAL AMENDMENT TO THE 2019 ANNUAL ACTION PLAN CDBG CARES Act /CDBG-CV/20/28/2022](#) June 15, 2022

[NOTICE: Public Works and Safety extends bid solicitation for Warming Center construction with Wed. May 25 - May 13, 2022](#)

[CITY OF GARY, INDIANA NOTICE OF SUBSTANTIAL AMENDMENT TO THE 2019 ANNUAL ACTION PLAN CDBG CARES Act /CDBG-CV/20/28/2022 - APRIL 6, 2022 - March 30, 2022](#)



Consolidated Plans/Annual Action Plans/CAPERS

The City of Gary participates in several Department of Housing and Urban Development (HUD) programs: Community Development Block Grant, HOME Investment Partnership Grant, and Emergency Solutions Grant. To participate in the stated programs, the City must submit the Consolidated Plan and subsequent reporting requirements to HUD pursuant to 24 CFR Parts 91. The Department of Community Development serves as the lead agency in the planning process, development, and implementation of the Plan. Together with an extensive collaborative among various City departments and non-profit partners, we seek to identify community needs and establish realistic goals and objectives for meeting those needs.

Funding provided under each grant program is used to fund an array of activities that serve to implement identified strategies in the community and economic development process. For your convenience the following sites will provide additional information on HUD programs and the City's Plan and Report.

2023 ANNUAL ACTION PLAN

[NOTICE OF PUBLIC HEARING CITY OF GARY 2023 ANNUAL ACTION PLAN – June 27, 2023](#)

[Notice of Funding Opportunity/Action Availability, CDBG, ESG, and HOME Endorsed Commitment Grants 2023 Program Year Funding – October 17, 2022](#)

2022-2026 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

2022 CAPER

CITY OF GARY
NOTICE OF PUBLIC HEARING
2023 ANNUAL ACTION PLAN
The City of Gary Community Development Department has scheduled a Public Hearing to present a summary of the 2023 Annual Action Plan. The Plan will include the proposed use of federal grant dollars from the Community Development Block Grant (CDBG), Emergency Solutions Grants Program (ESG), and HOME Investment Partnerships Program (HOME) that affect our community. The public hearing is open to the general public and all citizens are invited to attend and provide comments and/or suggestions. The meeting will start promptly at 4:30 P.M. on the date and at the location listed below:

Tuesday, July 11, 2023
The Greg Peterson Council Lounge
City Hall
201 Broadway, 2nd Floor, Room 202
Gary, IN 46402

A Draft of the Plan will be made available for review and comment on July 12, 2023 at the City of Gary Community Development Department, 101 Broadway, Suite 202, Gary, IN 46402. There is a 30-day public review and comment period. Survey forms will be made available to citizens in an effort to provide written comments and/or suggestions and may be submitted in person at the public hearing, emailed to kmcclellan@gary.gov, or mailed to Ms. Kimberley McClam, City of Gary Community Development Department, 101 Broadway, Suite 202, Gary, IN 46402. Comments received will be incorporated into the final document and submitted to the U.S. Department of Housing and Urban Development (HUD). Please contact Ms. McClam for any other additional information. Special Accommodations: Provided to our full disability and civil rights requirements and procedures for effective communication, accessibility and reasonable accommodation, persons with disabilities or limited English proficiency (LEP) individuals who wish to participate in this hearing may make requests for accommodations such as a hearing interpreter, alternate format materials, auxiliary aids, sign language, or other by contacting Ms. McClam at (219)581-3073 or kmcclellan@gary.gov at least five (5) days prior to the meeting.
8/27-2023

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**CITY OF GARY
NOTICE OF PUBLIC HEARING
2023 ANNUAL ACTION PLAN**

The City of Gary's Community Development Department has scheduled a Public Hearing to present a summary of the 2023 Annual Action Plan. The Plan will include the proposed use of federal grant dollars from the Community Development Block Grant (CDBG), Emergency Solutions Grants Program (ESG), and HOME Investment Partnerships Program (HOME) that affect our community. The public hearing is open to the general public and all citizens are invited to attend and provide comments and/or suggestions. The meeting will start promptly at 4:30 P.M. on the date and at the location listed below:

Tuesday, July 11, 2023
The Cleo Wesson Council Lounge
City Hall
401 Broadway, 2nd Floor, Room
206
Gary, IN 46402

A Draft of the Plan will be made available for review and comment on July 12, 2023 at the City of Gary Community Development Department, 401 Broadway, Suite 300, Gary, IN 46402. There is a 30-day public review and comment period. Survey forms will be made available to citizens in an effort to procure written comments and/or suggestions and may be submitted in person at the public hearing, emailed to kmcclam@gary.gov or mailed to Ms. Kimberley McClam, City of Gary Community Development Department, 401 Broadway, Suite 300, Gary, IN 46402. Comments received will be incorporated into the final document and submitted to the U.S. Department of Housing and Urban Development (HUD). Please contact Ms. McClam for any other additional information. Special Accommodations: Pursuant to our fair housing and civil rights requirements and procedures for effective communication, accessibility and reasonable accommodation, persons with disabilities or limited English proficient (LEP) residents who wish to participate in this hearing may make requests for accommodation such as a language interpreter, alternate formatted materials, auxiliary aids, sign language, or other by contacting Ms. McClam at (219)881-5075 or kmcclam@gary.gov at least five (5) days prior to the meeting.
6/27 - 9386.

HSPAXLP

LEGAL

**CITY OF GARY
NOTICE OF PUBLIC HEARING
2023 ANNUAL ACTION PLAN**
The City of Gary's Community Development Department has scheduled a Public Hearing to present a summary of the 2023 Annual Action Plan. The Plan will include the proposed use of Federal grant dollars from the Community Development Block Grant (CDBG), Emergency Sobriety Grants Program (ESG), and CME Investment Partnerships Program (HUD). This affects our community. The public hearing is open to the general public and all citizens are invited to attend and provide comments and suggestions. The hearing will start promptly at 4:00 PM, on the date and at the location listed below.
Tuesday, July 11, 2023
The Gary-Posey Council Lounge
City Hall
401 Broadway, 2nd Floor, Room 216
Gary, IN 46402

A Draft of the Plan will be made available for review and comment on July 12, 2023 at the City of Gary Community Development Department, 401 Broadway, Suite 200, Gary, IN 46402. There is a 30-day public review and comment period. Survey forms will be made available to citizens in an effort to procure written comments and suggestions. Comments and may be submitted in person at the public hearing, emailed to kened@cityofgary.org or mailed to Ms. Kimberley McClain, City of Gary Community Development Department, 401 Broadway, Suite 200, Gary, IN 46402. Comments received will be incorporated into the final document and submitted to the U.S. Department of Housing and Urban Development (HUD). Please contact Ms. McClain for any other additional information, Special Accommodations: Pursuant to our Fair Housing and civil rights requirements and procedures for effective communication, accessibility and language information persons with disabilities or limited English proficiency (LEP) individuals who wish to participate in this hearing may make requests for accommodations such as a large font interpreter, alternate formatted materials, auxiliary aids, sign language, or other by contacting Ms. McClain at (219)851-5675 or kened@cityofgary.org at least two (2) days prior to the meeting.
06/27/23 4:00pm
HSP/MP

CHICAGO TRIBUNE

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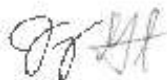
State of Illinois)
County of Cook) ss.

I, Jeremy Gates, a principal clerk of Post Tribune newspaper of general circulation printed and published in the English language in the city of Crown Point, in the State of Indiana and County of Lake, and that the printed matter attached hereto is a true copy, which was duly published in said paper for 1 time(s), the date(s) of publication being as follows:

Jun 28, 2023.

The undersigned further states that the Post Tribune newspaper(s) maintains an Internet website, which is located at http://classifieds.chicagotribune.com/classifieds?category=public_notice website and that a copy of the above referenced printed matter was posted on such website on the date(s) of publication set forth above.

Dated at Chicago, Illinois on this 29 day of June, 2023.



Jeremy Gates

150 N Stetson Ave
Chicago, IL 60601

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160 N Stetson Avenue, Chicago, IL 60601
(312) 222-2222 - Fax: (312) 222-4044

CHICAGO TRIBUNE

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CITY OF GARY NOTICE OF PUBLIC HEARING 2023 ANNUAL ACTION PLAN

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Tuesday, July 11, 2023
The Cled Wesson Council
Lounge City Hall
401 Broadway, 2nd Floor,
Room 206 Gary, IN 46402

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materials received will be incorporated into the final document and submitted to the U.S. Department of Housing and Urban Development (HUD). Please contact Ms. McClam for any other additional information. Special Accommodations: Pursuant to our fair housing and civil rights requirements and procedures for effective communication, accessibility and reasonable accommodation, persons with disabilities or limited English proficient (LEP) residents who wish to participate in this hearing may make requests for accommodation such as a language interpreter, alternate formatted materials, auxiliary aids, sign language, or other by contacting Ms. McClam at (219)883-5075 or kmcclam@gary.gov at least five (5) days prior to the meeting.
June 28, 2023 7455574
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Public Hearings

CITY OF GARY
NOTICE OF PUBLIC
HEARINGS 2023 ANNUAL
ACTION PLAN

The City of Gary's Community Development Department has solicited a Public Hearing in respect a summary of the 2023 Annual Action Plan. The Plan will include the proposed use of federal dollars from the Community Development Block Grant (CDBG), Emergency Solutions Grants Program (ESG) and HOME Investment Partnerships Program (HOME) provided our community. The public hearing is open to the general public and all citizens are invited to attend and provide comments and/or suggestions. The meeting will start promptly at 4:30 PM on the date and at the location listed below.

Tuesday, July 11, 2023
The Cleveland Center
Lounge City Hall
401 Broadway 2nd Floor,
Room 206 Gary, IN 46402

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July 28, 2023 /465574
H5FAXL

Public Hearings

CITY OF GARY
NOTICE OF PUBLIC
HEARINGS 2023 ANNUAL
ACTION PLAN

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July 28, 2023 /465574
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JEROME A. PRINCE
Mayor

CITY OF GARY
COMMUNITY DEVELOPMENT DEPARTMENT
401 Broadway, Suite 300
Gary, IN 46402
(219)881-5075 - FAX: (219)881-5085

Arlene D. Colvin
Director

AGENDA

2023 Annual Action Plan

PUBLIC HEARING

Tuesday, July 11, 2023
4:30 p.m.

The Cleo Wesson Council Lounge
City Hall

- | | |
|------------------------------------|--|
| 1. Welcome Remarks | Kimberley McClam
Compliance Specialist |
| 2. Introduction and Process | Arlene Colvin
Director, Community Development |
| 3. 2023 Annual Plan | Taghi Arshami
Principal, The Arsh Group Inc. |
| 4. Public Comments | |
| 5. Adjournment | |

City of Gary Community Development Department
 2023 Annual Action Plan
 Public Hearing Attendance Sheet
 July 11, 2023 - 4:30 P.M.

No.	Name	Organization and Address	Phone Number	Email Address
1	Evelyn Aponte	COMM. DEV. DEPT 401 Broadway, Ste 300 Gary, IN 46402	219-881-5075	aponte@cityofgary.gov
2	Stephanie McEwen	Comm. Dev. Dept 401 Broadway, Ste 300	219-881-5075	Kmacal@cityofgary.gov
3	Vanita Haskie	Broadway Area CDC 650 Grand South 4	219-614-2905	vhaske@broadwaycdc.org
4	Wendie Durbridge	Habitat for Humanity 3777 Colfax St Gary	219-983-7265	wendie@nwibab.net.org
5	Beth Scamathing	CRISIS CENTER 101 W. Montgomery - 600 N. 5th	219-936-7070	BETH@CRISISCENTERYSB.ORG
6	Laurel Reed	"	219-938-2070	Lreed@crisiscenterysb.org
7	Sandra Noe	Meals on Wheels 8446 Virginia St. Merrillville, IN 46410	219-756-3663	Sandra@mo.wv.indi.gov
8	Jennifer Okamuzer	Meals on Wheels 8446 Virginia St Merrillville, IN 46410	219-756-3663	Jen@mo.wv.indi.gov

City of Gary Community Development Department
 2023 Annual Action Plan
 Public Hearing Attendance Sheet
 July 11, 2023 - 4:30 P.M.

No.	Name	Organization and Address	Phone Number	E-mail Address
9	TIM ERVIN	POWERS & SONS CONSTRUCTION 2636 W. 15TH AVE	219 499 3100	tervin@powersandsons.com
10	Nancy Knightly	10090 Vandenberg Seymour, IN 46446	219 476 5192	Nancy.Knightly@dunetel.com
11	Judith L Samson	CITY OF GARY COM. DEV.	219 881 5075 X16753	jsamson@gary.gov
12	Therese Asquami	THE PRSH GROUP	219-987-9150	TASQUAMI@PRSHGROUP.COM
13	Diana Sadeh	GARY ECON. DEV. CORP.	219-201-7582	dsadeh@gary.gov
14	Ahlene Colvin	Comm. Dev/Gary	219-887-5075	acolvin@gary.gov
15	Wanda Pettigrew	Community Developm	219-887-5075	wpettigrew@gary.gov

2023 ANNUAL ACTION PLAN PUBLIC HEARING		
Location: The Cleo Wesson Council Lounge – City Hall	Date: July 11, 2023	DURATION: 45 Minutes
Recorder of Minutes	Kimberley McClam	Initials: KM
List of Attendees	Please see last page of minutes	

Ms. Kimberley McClam, Compliance Specialist

Community Development Division, called the public hearing to order at 4:35 pm.

Ms. McClam welcomed those who were in attendance and thanked everyone for attending the 2023 Annual Action Plan public hearing. Ms. McClam informed everyone that the meeting was being recorded. Ms. McClam asked that all attendees please sign in. Ms. McClam stated that everyone should have a packet containing a copy of the Agenda, a Summary of the 2023 Annual Action Plan, and a copy of the Neighborhood Development Survey and if anyone did not have the packet to please let her know. She informed everyone to please complete the survey and return to her prior to leaving. Ms. McClam stated that the survey serves as a means for the community to provide valuable feedback and comments regarding needs in your neighborhood and helps the City to better understand the community's interests and concerns. She added that the City uses the survey results to help develop objectives for future use of these federal funds being discussed today. Ms. McClam requested that everyone introduce themselves by providing the name, title, city department or organization that they are affiliated with. Ms. McClam then turned the meeting over to Ms. Arlene Colvin, Director for the Community Development Department.

Ms. Arlene Colvin, Director Community Development

Ms. Colvin welcomed and thanked everyone for attending the 2023 Annual Action Plan public hearing. Ms. Colvin began the public hearing by stating that this is an annual process which includes finalizing the Annual Action Plan which must be submitted to HUD on an annual basis so that we can receive our annual allocation of Community Development Block Grant, HOME (HOME Investment Partnerships Grant) and Emergency Solutions Grant funding. Ms. Colvin stated that on a yearly basis, we invite the public to submit applications to receive funding from these allocations that we receive. She added that from the 2023 allocation, that process took place between October and November of 2022. Ms. Colvin mentioned that this public hearing is somewhat of a culmination of the process that has taken place over the last six months in the development of our plan. She added that the City has engaged a consultant to assist with this process, The Arsh Group and tonight Mr. Taghi Arshami will be going through our plan as we envisioned it based on input that has been received from agencies and the public. Ms. Colvin then turned the meeting over to Mr. Taghi Arshami.

Taghi Arshami, Consultant/Principal Planner of the Arsh Group, Inc.

Mr. Arshami began by thanking everyone for attending. As Ms. Colvin indicated, my name is Taghi Arshami and I am the principal planner with the firm of Arsh Group in Merrillville and this is a continuation of a planning process that actually started three years ago.

He stated that the City is required to prepare a five-year Consolidated Plan that outlines what the plans are for the next five years. It establishes a budget, sets priorities, establishes goals and those goals are identified in this handout that you have. He stated that based on those goals and priorities, the City allocates funds to certain projects on an annual basis and because of the limited budget, some of these projects are not necessarily implemented on a continuing basis. He noted that some projects are allocated in the first year and some projects in the 3rd or 4th year down the line just to meet the budgetary requirement, set to establish a normal process for allocating resources.

Mr. Arshami stated that the Consolidated Plan establishes seven goals and these goals range from housing, affordable housing, public facilities, public services and one way or another economic development and redevelopment. He mentions that each one has a specific focus, what is the focus for the City for the next five years. One of the items in these goals are to make sure the City addresses the needs of the community. So, the City will try to make sure that all of those essential needs are addressed during the course of the five years.

He mentioned that the City selected new projects based on consultation and elaborated that the City's effort last year benefited 6,544 people. Mr. Arshami added that there is a list of accomplishments in this handout and it would be nice to recognize the effort of the Community Development staff and subrecipients.

He stated that in terms of the process, the City started last October and with the announcement they received 15 applications and 12 were eventually approved for funding. Mr. Arshami went on to say that the Community Development department also runs certain programs where there are no applications for those, the First Time Homebuyers Program for example. He mentioned that one of the things the City has faced over the years is that funds are not released until almost the following year. Mr. Arshami stated that we should have started this process last August. He added that the City does not know what the allocations are, they cannot move forward until February-April. He mentioned that today's action is sort of the last process where the city would like to get your input on the projects that they are planning to fund. He stated that you have 30 days to respond, and we can certainly take your input tonight but you can also respond later within the next 30 days. Mr. Arshami mentioned that we are planning to submit the application on August 12th or 13th at the latest to HUD and HUD has 45 days to review it. He added that if HUD receives any comments outside of what the City has received, they will let the City know then the funds may be released after that 45-day process.

Mr. Arshami asked if there were any questions and if anyone had any comments? He stated that if there were no questions, he could quickly go over the projects. Mr. Arshami mentioned that the City does have priorities, and briefly went over them:

- **Public Facilities and Infrastructure Improvements-** Funds are used for improvement of streets (i.e. repaving) and improvements to community facilities. Mr. Arshami stated that the City is repaving streets in low to moderate income neighborhoods and this year the City is going to repave 9th-11th Avenues on Madison Street. He mentioned that the City also supports repaving of streets when new housing is being constructed. He stated that the City funded improvements for 3 community centers last year.
- **Public Services-** Mr. Arshami stated that those funds are the most requested and the City has selected 6 different agencies that they plan to fund such as the Gary Health Department, Gary Human Relations, Youth Service Bureau, HON (Homeownership Opportunity Network), and Meals on Wheels.
- **Housing-** Mr. Arshami stated that Seniors are naturally the most needed and emergency repairs to homes, without these programs individual families can easily become homeless. He added that one Neighborhood Rehab Program rehabs foreclosed homes already acquired by the City through the NSP, and 3 grants years ago and sell them to low to moderate income persons. Mr. Arshami mentioned a new activity that the City is supporting which is the Accessibility Program which provides disabled access ramps for low to moderate income residents with physical disabilities.
- **Demolition-** Mr. Arshami mentioned that this project has been funded for a long time and the program is administered by the Redevelopment Department. Most of the Demolition is done on blighted residential and commercial structures.
- **Code Enforcement** Mr. Arshami added that Community Development funds Code Enforcement so stability of the neighborhoods are protected and preserved and these are all integrated. You may have a neighborhood where homeowners and/or tenants have not been maintaining the homes and the City cites them with violations.
- **Micro-Enterprise Initiative Program-** Mr. Arshami mentioned that one of the new programs that the City has established this year, and used to have a few years back, is the Micro-Enterprise Initiative Program which is an Economic Development program helping entrepreneurs build and develop businesses in the city.

Mr. Arshami went on to say that this is an overall list of activities that the city plans or Community Development plans to fund from Community Development funds. He mentioned that the City gets funds from the Community Development Block Grant, and that there is another one which is called HOME (Home Investment Partnerships Program) that is primarily related to housing and the ESG funds (Emergency Solutions Grant) which is specifically targeted for the prevention of homelessness.

Mr. Arshami stated that under the HOME fund category, the City funds four different programs and one is call CHDO set-aside which is a program that 15% of HOME dollars has to be assigned for development or carried out by what is called a CHDO (Community Housing Development Organization). He added that there is a Homeownership program called the First Time Homebuyers Program that is being carried out and provides down payment assistance. The Affordable Housing program is a general term for development, construction, and rehabilitation of affordable housing development either leased or sold for use.

Mr. Arshami also stated that Habitat of Humanity has received funding this year as before, and is one of the better organizations that has consistently produced at least two homes in the last few years in the City of Gary and they continue to build in the Field of Dreams area in the 1700 and 1800 blocks of Washington to Adams Street.

Mr. Arshami went on to say that the BSG program's primary goal is to prevent homelessness where instead of helping people go to homeless shelters, the goal is to find them housing. He mentioned that the City doesn't spend a substantial amount of funds in prevention but at the same time there are shelters that the city funds for shelter operations, which includes the Crisis Center an organization that primarily houses homeless youth, and also Lydia House which houses homeless women with no children. He added that the rest of the funds will go towards NWT Reinvestment Alliance for prevention and rapid rehousing.

Mr. Arshami stated that this was a very quick synopsis of the activities being funded and I would be happy to answer any questions on behalf of the City.

Ms. Nancy Knightly, Sojourner Truth

I do have a quick question. I am new to this process and so in terms of the funding, timing and everything, I heard something about money being received in February already but I perhaps misheard that, okay. So, this is monies that is coming; this the Action Plan for monies that will be paid when?

Ms. Arlene Colvin, Director Community Development

This year, this is our 2023 allocation.

Ms. Nancy Knightly, Sojourner Truth

Okay, and you will be receiving the monies or issuing the monies or when will it be received?

Ms. Arlene Colvin, Director Community Development

We will be receiving money from HUD, and HUD has 45 days from August 15th, I think it is.

Teghi Arshami, Consultant/Principal Planner of the Arsh Group, Inc.

Right, I apologize, I should have gone through that part of the process. We are at the Public Meeting right now, so action of the projects. We have 30 days from today to receive public comments and then the City submits the application to HUD. From the date that the City submits the application to HUD, HUD has 45 days to respond, approve or reject. So, the City will receive a letter within those 45 days stating yes, we have approved your application, your application has been approved, or you must make minor modifications and resubmit. These are the scenarios. All of this are done online, there is nothing here. This whole application is about 220 pages long. Once the 45 days and it has been approved by HUD, HUD will send a letter requesting the City to go into an agreement with HUD and that typically takes another 30 or 40 days if the City is lucky, then they get the release of funds.

Ms. Nancy Knightly, Sojourner Truth

So, the funding then will be released, that is received by the City in 2024?

Ms. Arlene Colvin, Director Community Development

It will be released this year but it will probably be in October or something like that.

Ms. Nancy Knightly, Sojourner Truth

So, by the time it is received then you will be releasing the funds.

Ms. Arlene Colvin, Director Community Development

We enter into subrecipient agreements with our agencies that are funded, and then they are able to receive their dollars.

Ms. Nancy Knightly, Sojourner Truth

Ok, alright thank you and since it is a 5 Year Plan, is this process then like a survey, the point of the survey is to begin the process the plan for next year?

Ms. Arlene Colvin, Director Community Development

Yes

Ms. Nancy Knightly, Sojourner Truth

So, the survey is a direct fall back for next year and the funds are meant to be spent during what time frame?

Ms. Arlene Colvin, Director Community Development

It is typically a year, we give you a performance period of a year.

Taghi Arshami, Consultant/Principal Planner of the Arsh Group, Inc.

From the time you sign the contract.

Ms. Arlene Colvin, Director Community Development

There are some differences depending upon on what type of money you get. For example, ESG money maybe two years, you know HOME money may be longer than that, so it just depends on what program we are talking about.

Ms. Nancy Knightly, Sojourner Truth

Our auditors always wanted to have that documented, the time frame that we are supposed to use.

Ms. Arlene Colvin, Director Community Development

It is in the agreements too, so we kind of hold your feet to the fire. Not that bad but we do have clear parameters on how long you have to spend the money and what you can spend it for.

Ms. Nancy Knightly, Sojourner Truth

Are most of them on a reimbursement basis, spend the money first and then we will reimburse you?

Ms. Arlene Colvin, Director Community Development

It depends on the Grant.

Evelyn Aponte, Compliance Manager

We don't just give you the money up front

Ms. Arlene Colvin, Director Community Development

Are there any other questions?

Taghi Arshami, Consultant/Principal Planner of the Arsh Group, Inc.

As I said before, thank you for coming in. If you have any questions, or need additional information, or if you have any comments, please contact Kim as soon as possible because it takes time at the end of this process for us to collect this information. So, the sooner we get them, the sooner we can submit the City's application to HUD. Our next round of funding for 2024 may not be until the end of the year for 2024 funding. So, if you are interested in receiving any information, let us know or we can just take you from the list and send it to you.

Vernita Leslie, Executive Director, Broadway Area CDC

I would like to recommend that we do like a webinar or a pre-discussion before we do the application.

Ms. Arlene Colvin, Director Community Development

To explain how to do the application, Okay

Vernita Leslie, Executive Director, Broadway Area CDC

Yes, to make sure we are doing the right application. Maybe not in person but maybe you know on the phone.

Evelyn Aponte, Compliance Manager

We are going in attempt to. We have been trying but with the Covid grants, we have been bombarded and it is a trying time.

Taghi Arshami, Consultant/Principal Planner of the Arsh Group, Inc.

Hopefully, next year it will be smoother as far as HUD is concerned. As you may recall earlier this year, we had problems with Congress approving the funds.

Ms. Arlene Colvin, Director Community Development

And that always is a problem. When they delay their budget approval then that impacts when we get the money.

Taghi Arshami, Consultant/Principal Planner of the Arsh Group, Inc.

But they did that for two years that consideration was for two years. So hopefully, the City will get their money on time. Technically, the money should be here by August of this year for 2024.

Ms. Arlene Colvin, Director Community Development

Technically.

Meeting is adjourned.

Staff:

Ms. Arlene Colvin, Director Community Development

Ms. Evelyn Aponte, Compliance Manager

Ms. Wanda Pottigrow, Special Programs Manager

Ms. Judith Samson, NSP Coordinator/Counselor

Ms. Kimberley McClum, Compliance Specialist

Consultant

Mr. Taghi Arshami, Principal of the Arsh Group, Inc.

Public:

Vernita Leslie, BACDC

Weude Burbridge, Habitat for Humanity

Both Szamatowicz, Crisis Center

Laurel Reed, Crisis Center

Sandra Noe, Meals on Wheels

Jennifer Okamura, Meals on Wheels

Tim Ervin, Power & Sons Construction

Nancy Knightly, Sojourner Truth House

Diane Swadlin, Gary Economic Development Corp.

Grantee Unique Appendices

Grantee Unique Appendices

EXHIBITS

Exhibit #1

Geographic Distribution

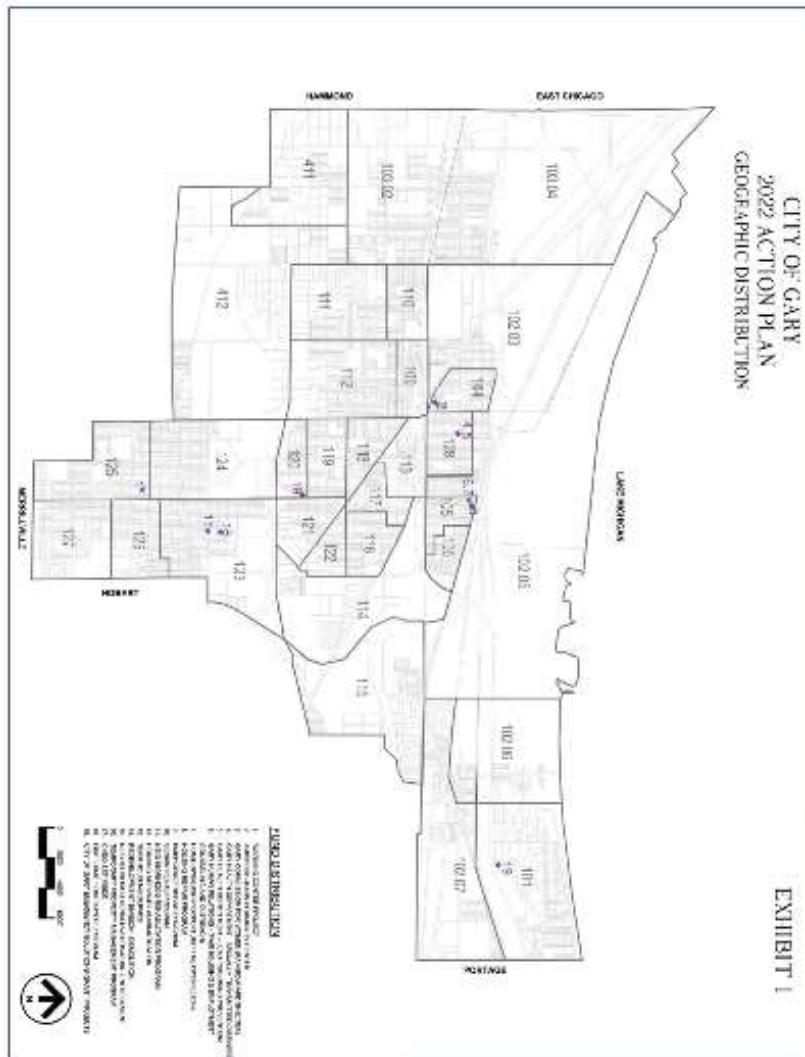


EXHIBIT #2

HOME Affordability Limits

Maximum Property Value

PJs are required to use the 95% of Area Median Purchase Price Value as the limitation of purchase price for HOME units. As a surrogate for calculating this data locally, HUD provides allowable value limits for maximum purchase price by area. The dataset used for determining this percentage changed as of the 2013 HOME Final Rule; as a result, the new limits are no longer based on 203(b) and are referred to as the HOME Homeownership Value Limits. The new limits provide maximum values by unit size and with regard to whether the unit is new or existing.

In Gary, the sales price of any homebuyer property assisted with HOME funds must not exceed 95 percent of the area median purchase price for that type of single-family housing for the Gary, IN HUD Metro Area. As noted above, HUD allows PJs to use either the HOME Homeownership Value Limits established by HUD or the actual 95 percent of median sales price limits for the area, whichever is higher; the City of Gary opts to utilize the HOME Homeownership Value Limits method. Program documents (including underwriting worksheets) will be updated annually to reflect the updated figures. The 2018 limits are as follows.

Purchase Price Limits, Effective July 1, 2023

Housing Type	1-Unit	2-unit	3-unit	4-unit	Unadjusted Median
Existing Homes	\$223,000	\$286,000	\$346,000	\$428,000	\$234,900
New Homes	\$326,000	\$417,000	\$505,000	\$626,000	\$343,200

In order to ensure compliance with the maximum property value requirement, the City of Gary shall determine and document the value (or after-rehabilitation value for rehab projects) of the unit prior to HOME assistance being provided. To establish the value of the home, the PJ may use an estimate of value, appraisal or tax assessments; these methods are described in greater detail in the Homeowner Rehabilitation Section XI. For homebuyer projects, City of Gary generally shall require that a copy of the appraisal of the HOME-assisted property, conducted prior to the loan closing, be provided to City of Gary. The appraisal amount, when added to the total dollar amount of rehabilitation (according to the bid), must be less than the HOME Homeownership Value Limit for the unit; for down payment assistance-only projects, the rehabilitation amount would be zero (\$0). City of Gary (or the developer, if applicable) shall utilize the "Calculation of Maximum Property Value" form to document compliance with this requirement for each property. A copy of this form shall be completed and dated prior to the date of purchase and maintained with the project file. If the home value calculated is higher than the HOME Homeownership Value Limit, the project must not move forward.

For all units considered for rehabilitation using HOME funds, to avoid the unnecessary expenditure of funds on a project that may not move forward because of this limit, the rehabilitation inspector shall provide a preliminary estimate of the initial value of the property and an estimate of the cost of rehab work following inspection of the property. When added together on the "Preliminary Calculation of After-Rehabilitation Value" form, those amounts should be under the HOME Homeownership Value Limit, or the project should be abandoned. If applicable, this form shall be completed, signed and dated prior to bidding the project and maintained with the project file.

EXHIBIT #3

ESG Written Standards

ESG Program Manual (Program Policies & Procedures)



**CITY OF GARY, INDIANA
EMERGENCY SOLUTIONS GRANTS PROGRAM
WRITTEN STANDARDS**

Revised September, 2023

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INTRODUCTION

The City of Gary, Indiana has developed the following standards for providing assistance with Emergency Solutions Grants (ESG) funds as required by 24 CFR 576.400 (e). These standards were created in coordination with the Region 1a Planning Council which was led by the Continuum of Care of NWI (CoC) which includes Lake County, Indiana. They are in accordance with the interim rule for the Emergency Solutions Grants Program released by the U.S. Department of Housing and Urban Development on December 4, 2011 and the final rule for the definition of homelessness also released by the U.S. Department of Housing and Urban Development on December 4, 2011.

The City of Gary expects that the standards will adjust as the City of Gary gains more experience with and collects more data from services provided with the Emergency Solutions Grants program. The Standards serve as the guiding principles for funding programs.

DEFINITIONS

At risk of homelessness - (1) An individual or family who: (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD; (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and (iii) Meets one of the following conditions: (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance; (B) Is living in the home of another because of economic hardship; (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals; (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau; (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan; (2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or (3) A child or youth who does not qualify as "homeless" under this section, but qualifies

as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Chronically Homeless – a homeless individual with a disability who lives either in a place not meant for human habitation, a safe haven, or in an emergency shelter, or in an institutional care facility if the individual has been living in the facility for fewer than 90 days and had been living in a place not meant for human habitation, a safe haven, or in an emergency shelter immediately before entering the institutional care facility. In order to meet the “chronically homeless” definition, the individual also must have been living as described above continuously for at least 12 months, or on at least 4 separate occasions in the last 3 years, where the combined occasions total a length of time of at least 12 months. Each period separating the occasions must include at least 7 nights of living in a situation other than a place not meant for human habitation, in an emergency shelter, or in a safe haven.

Continuum of Care (CoC) – the group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Emergency Shelter – any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

Homeless – (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground; (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution; (2) An individual or family who will imminently lose their primary nighttime residence, provided that: (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; and (iii) The individual or

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family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing; (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento \Homeless Assistance Act (42 U.S.C. 11434a); (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance; (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or (4) Any individual or family who: (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (ii) Has no other residence; and (iii) Lacks the resources or support networks, e.g., family, friends, faith based or other social networks, to obtain other permanent housing.

Homeless Management Information System (HMIS) – the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Homelessness Prevention – Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in Homeless Category 1 of Appendix A: HUD Definition for Homeless.

Private Nonprofit Organization – a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices

nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Program Participant – an individual or family who is assisted under ESG program.

Rapid Re-Housing – Housing relocation and stabilization services and/or short-and/or medium- term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Service Area – The City of Gary’s service area includes the City’s incorporated limits. A map for reference is included on Appendix F.

Street Outreach – Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care.

Subrecipient – a unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

Victim Service Provider – a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

STANDARDS APPLICABLE TO ALL PROGRAM COMPONENTS

SERVICE AREA

The service area where assistance will be offered is in the City of Gary corporate city limits.

ELIGIBLE ESG PROGRAM COMPONENTS

There are four (4) ESG Program Components that will be offered through the ESG program:

1. Street Outreach;
2. Emergency Shelter;
3. Rapid Re-Housing;
4. Homelessness Prevention; and

Funds for ESG can be used to support any of the eligible components. The City of Gary and the CoC gives priority to funding that supports securing housing options for homeless households and to support the expansion of rapid re-housing.

COORDINATING ASSESSMENT & SERVICES AMONG PROVIDERS

The City of Gary expects that all providers participate in the coordinated assessment system. The system consists of an electronic assessment housed in the HMIS and a dedicated Project Manager through the CoC Lead Agency. Coordinated assessment uses a common housing assessment to ensure that all homeless individuals are referred to the appropriate housing intervention. Coordinated assessment will be used as each housing intervention supported by ESG.

Verification of Homeless Status: Project level staff are required to obtain documentation at project intake of homeless or at-risk of homelessness status. This status must be maintained in the client's file and available for monitoring by the City of Gary and HUD. These Standards establish the order of priority for obtaining evidence [per 24 CFR 576.500 (b)] as: 1) third-party documentation, 2) intake worker observations, and 3) certification from the person seeking assistance.

Designate staff members for Region 1a Planning Council (RPC) Provider Input Meetings: Each agency will assign two representatives to attend the meetings, where at least one member has decision making capacity for the program. RPC Provider Input Meetings will be conducted on the second Thursday of every month at 10:00 a.m. where providers give and receive information regarding RPC strategies and policies.

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Participate in any standardized training as designated by ESG funders and offered through CoC. The CoC will provide a vetted and standardized training curriculum for all housing stability case managers that will be available for all agencies providing case management for housing based services. The curriculum and standards will be developed as a part of and in partnership with the Continuum of Care Technical Assistance from the Department of Housing and Urban Development. This will focus on the requirements of maintaining stable housing and ensure access to mainstream resources that will provide ongoing, continued and necessary support for households to gain and maintain stable housing.

COORDINATING WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

The City of Gary expects that every agency that is funded through ESG will coordinate with and access mainstream and other targeted homeless resources. The City of Gary will evaluate performance of each provider based on the outcomes achieved toward housing models adopted through the Region 1a Steering Committee. These outcome measures will be used to evaluate program success annually. The City of Gary will use this and other performance metrics to guide funding decisions for ESG funded programs. Required outcomes for each intervention around accessing mainstream resources will match the outcomes approved by the Region 1a Steering Committee annually.

The Northwest Indiana Community Action (NWICA) agency is serving as the Managing Entity of Region 1A's Prioritization List. NWICA will lead the implementation of the Coordinated Entry system and has committed resources and staffing to administer assessments, analyze assessment results and support referrals to housing interventions. NWICA will also serve on the statewide Indiana Coordinated Entry Steering Committee, as the system was launched, managed and evaluated.

The Coordinated Entry system established in Region 1A has received overall program management support from the Indiana Balance of State Continuum of Care. Our communities focus on quickly connecting households experiencing chronic homelessness to permanent housing interventions. Region 1A has developed de-centralized entry points of access for households experiencing homelessness. These designated access centers will be the sole locations where homeless or those at-risk of homelessness will be directed for assessment prior to being admitted to any homeless assistance program

Utilization of the VI-SPDAT (Vulnerability Index-Service Prioritization Decision Assistance Tool as created and owned by Community Solutions and Org Code Consulting, Inc.): Standardized Assessment Tool(s) will be used by all CE Access Points to determine a household's current housing situation, housing and service needs, risk of harm, risk of future or continued homelessness, and other adverse outcomes. Staff administering the VI-SPDAT Standardized Assessment Tool(s) has completed required training through Org Code.

Coordination of policies and procedures for homeless assistance programs will primarily be achieved through the City of Gary and Regional Planning Council. Active participation in the Regional Planning Council is required. The City and RPC will support a variety of activities which assure availability of services as well as coordination and management. Specifically, the coordination effort will include:

- The City and RPC will implement a coordinated front and back door assessment process through Coordinated Entry participants. All CE participants will be encouraged to use this process and report as required to assure full coordination. This process will be refined to assure rapid rehousing for all homeless and at risk in the system.
- The CE participants will coordinate and evaluate the intake process and conduct a quarterly peer evaluation to assure effectiveness.
- Periodically, meetings of all participating agencies will be held to ensure effective ongoing management and provide updates on any new program developments, outcomes to date, and to allow for discussion and resolution of any project issues.
- Case managers and program representatives will be meeting applicants regularly in CE participating offices or in shelters. The City, CE staff, and shelter staff will also be routinely engaged in conversations and will be requested to participate in any process to assist the program in meeting the needs of the people and families it serves.
- Referral Service:
 - a. Participating agencies, including those receiving ESG funding for shelter operations, will be eligible to refer applicants into CE for homelessness prevention and rapid re-housing assistance.
 - b. The referral process for rapid re-housing and homeless prevention will be as outlined by the CE process and funding availability.
 - c. Referrals will be processed according to the vulnerability assessment (Vulnerability Index - Service Prioritization Decision Assistance Tool or VI-SPDAT).

COORDINATION WITH OTHER TARGETED HOMELESS SERVICES

The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. These programs include:

1. Permanent Supportive Housing Program (24 CFR part 578.37(a)(1)(i));
2. CoC Rapid Rehousing (24 CFR part 578.37(a)(1)(ii));
3. Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals (24 CFR part 882);
4. HUD—Veterans Affairs Supportive Housing (HUD—VASH) (division K, title II, Consolidated Appropriations Act, 2008, Pub. L. 110–161 (2007), 73 FR 25026 (May 6, 2008));

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5. Education for Homeless Children and Youth Grants for State and Local Activities (title VII–B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*));
6. Grants for the Benefit of Homeless Individuals (section 506 of the Public Health Services Act (42 U.S.C. 290aa–5));
7. Healthcare for the Homeless (42 CFR part 51c);
8. Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 *et seq.*));
9. Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc–21 *et seq.*));
10. Services in Supportive Housing Grants (section 520A of the Public Health Service Act);
11. Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 *et seq.*));
12. Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975));
13. Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021);
14. Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043);
15. VA Homeless Providers Grant and Per Diem Program (38 CFR part 61);
16. Health Care for Homeless Veterans Program (38 U.S.C. 2031);
17. Homeless Veterans Dental Program (38 U.S.C. 2062);
18. Supportive Services for Veteran Families Program (38 CFR part 62); and
19. Veteran Justice Outreach Initiative (38 U.S.C. 2031).

The recipient and its subrecipients must also coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:

1. Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
2. Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
3. Supportive Housing for Persons with Disabilities (Section 811) (24 CFR part 891);
4. HOME Investment Partnerships Program (24 CFR part 92);
5. Temporary Assistance for Needy Families (TANF) (45 CFR parts 260– 265);
6. Health Center Program (42 CFR part 51c);
7. State Children’s Health Insurance Program (42 CFR part 457);
8. Head Start (45 CFR chapter XIII, subchapter B);

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9. Mental Health and Substance Abuse Block Grants (45 CFR part 96); and
10. Services funded under the Workforce Investment Act (29 U.S.C. 2801 *et seq.*).

TERMINATION OF PARTICIPATION AND GRIEVANCE PROCEDURES

It is important that sub-recipients effectively communicate termination and grievance procedures to participants and ensure that the procedures are fully understood. The City of Gary CDD recommends that each sub-recipient require each participant to sign a form that states the participant has been explained the termination and grievance policy. Posting the policy on a bulletin board in a common area within the facility is an effective way to ensure that the termination and grievance procedures are available for participants to access at any time.

- A. If a participant violates ESG program requirements, the sub-recipient may terminate assistance in accordance with a formal process established by the sub-recipient that recognizes the rights of individuals affected. The sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.
- B. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:
 1. Written notice to the program participant containing a clear statement of the reasons for termination;
 2. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
 3. Prompt written notice of the final decision to the program participant.
- C. Termination under this section does not bar the recipient or sub-recipient from providing further assistance at a later date to the same family or individual.

FAIR HOUSING ACT COMPLIANCE

The Department of Housing and Urban Development ("HUD") is responsible for enforcing the federal Fair Housing Act (the "Act"), which prohibits discrimination in housing on the basis of race, color, religion, sex, national origin, familial status, and disability. One type of disability discrimination prohibited by the Act is the refusal to make reasonable accommodations in rules, policies, practices, or services when such accommodations may be necessary to afford a person with a disability the equal opportunity to use and enjoy a dwelling. HUD and DOJ frequently respond to complaints alleging that housing providers have violated the Act by refusing reasonable accommodations to persons with disabilities. State and federal laws require entities to make reasonable changes to policies, practices, procedures and/or physical changes to housing units and/or buildings if such changes are necessary to enable a person with a

disability to have equal access to the housing and/or building. Please note that such changes must be necessary as a result of the person's disability. To read more about what this policy entails refer to this link: https://www.hud.gov/program_offices/fair_housing_equal_opp/fair_housing_act_overview

Agencies receiving ESG Funds must have a policy in place for program recipients to request reasonable accommodations.

EQUAL ACCESS TO HOUSING FINAL RULES

On February 3, 2012, HUD published a final rule in the Federal Register entitled Equal Access to Housing in HUD Programs regardless of Sexual Orientation or Gender Identity. The rule creates a new regulatory provision that generally prohibits considering a person's marital status, sexual orientation, or gender identity (a person's internal sense of being male or female) in making housing assistance available. Lesbian, gay, bisexual, and transgender people are guaranteed equal access to all housing for all types of housing (affordable, permanent, transitional and emergency) funded through HUD.

In addition to the final rule on Equal Access to Housing, HUD published a final rule in the Federal Register entitled "Equal Access in Accordance with an Individual's Gender Identity in Community Planning and Development Programs". This rule was published on September 21, 2016. This rule ensures that each individual in accordance with their gender identity will have equal access to housing and shelter programs administered by HUD. This rule creates a new regulatory provision that requires those entities that are receiving any HUD funding grant equal access to facilities, benefits, accommodations and services to individuals in accordance with the individual's gender identity and in a manner that affords equal access to the individual's family.

WAIVERS

A Fair Market Rent Waiver is permission from an authorized HUD office to assist with rent payments above the established Fair Market Rent (FMR). It is considered an "exception" to established requirements. FMRs are used as a guide to determine the level of HUD subsidy for various programs such as the Emergency Solutions Grant (ESG). However, the FMR is not in itself the standard used for determining eligible rents. Each HUD rental assistance program is governed by its own set of statutes and regulations which determine how much rent HUD will pay.

Emergency Solutions Grant short- and medium-term rental assistance can be provided to eligible program participants only when the rent, including utilities (gross rent) for the housing unit does not exceed the FMR established by HUD for the MSA and complies with HUD's standard of rent reasonableness. HUD may consider waiver requests from ESG grantees to increase these rent limits. Subrecipients such as ACAM have requested and received waivers, but it should be noted that these waivers are time-limited (often, but not always, one year) and the requirement for rent reasonableness is not waived even when there is an FMR Waiver in place.

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STANDARDS SPECIFIC TO STREET OUTREACH

ELIGIBILITY: HOMELESS STATUS

Individuals/families who meet the HUD criteria for the following definitions are eligible for Street Outreach services:

- Homeless Category 1: Literally Homeless
- Homeless Category 4: Fleeing/attempting to flee DV (where the individuals/families also meet the criteria for Category 1)

In addition, individuals and families must be living on the streets or other places not meant for human habitation **and** be unwilling or unable to access services in an emergency shelter.

TARGET POPULATION

Although the homeless population is considered a vulnerable population, street outreach activities should target those who are extremely vulnerable including youth and chronically homeless persons.

ENGAGEMENT/COLLABORATION

The City of Gary requires that agencies conducting street outreach activities must engage with unsheltered homeless persons for the purpose of providing immediate support, intervention or connections with mainstream social service programs. The connection of any unsheltered person to an emergency shelter, supportive housing, and/or referral to social service agencies will serve as immediate support and intervention for housing stabilization or critical services.

Agencies are encouraged to use evidenced based practices for their street outreach efforts; including the Housing First Model that quickly connects individuals to permanent housing in the face of acute barriers to entry into housing programs. Additionally, the agencies will participate in the local Continuum of Care's Street Outreach Workgroup and utilize the Coordinated Access Assessment to identify barriers to housing.

ELIGIBILITY: INTAKE AND ASSESSMENT

The City of Gary requires that agencies conducting street outreach activities must provide individuals and families with an assessment and enter data into HMIS or a comparable database for DV providers. The City of Gary encourages providers to develop relationships with unsheltered homeless persons that will help connect them with emergency shelter and housing services primarily through a referral to Coordinated Access.

STANDARDS SPECIFIC TO EMERGENCY SHELTER

ELIGIBILITY: HOMELESS STATUS

Homeless clients entering into the shelter system must meet the HUD criteria for homelessness as either literally homeless (Homeless Category 1), at imminent risk of homelessness (Homeless Category 2), homeless under another federal statute (Homeless Category 3), or fleeing/attempting to flee domestic violence (Homeless Category 4).

For additional details related to the HUD definition of Homeless and applicability to each program component, see Appendix A and C.

ELIGIBILITY: INTAKE AND ASSESSMENT

Specific to Emergency Shelter:

- Any new client entering into a shelter must undergo a complete assessment to understand client needs and barriers and match the client to the most appropriate services provider. The standard assessment accounts for length and frequency of homelessness, physical and mental health status, criminal history, veteran status, domestic violence experience, substance abuse conditions and employment history.
- Clients will be prioritized within the emergency shelter system based on need, available resources, and geographic area.
- Emergency shelters are responsible to assess an individual or family's initial need for emergency shelter and must re-assess their need on an ongoing basis to ensure that only those individuals or families with the greatest need receive ESG-funded emergency shelter assistance. Shelters that serve families must serve all eligible families and may not refuse services based on the age of children or the size of the family.
- Providers must enter data into HMIS or a comparable database for DV providers.

ELIGIBILITY: PRIORITIZATION & REFERRAL POLICIES

Emergency shelters will prioritize individuals/families that:

- Cannot be diverted; and
- Are literally homeless; and
- Can be safely accommodated in the shelter; and
- Not in need of emergency medical or psychiatric services or danger to self or others
- Emergency Shelters cannot discriminate per HUD regulations.

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- There are no requirements related to ID, income or employment.
- Transgender placement based on gender self-identification.

General documentation standards, in order of priority, when obtaining documentation of Homelessness are as follows:

Documentation types in order of priority for households who are **Literally Homeless**:

- 1st - Written Third-Party Documentation** (e.g. a letter on agency letterhead with specific dates of contact such as from an emergency shelter provider, landlord, etc.)
- 2nd - Intake Worker Observations** (e.g. a letter on agency letterhead and/or form with intake worker signature documenting specific dates of contact; intake worker may include pictures in case file of where household is sleeping, if authorized to do so by household)
- 3rd - Applicant Self-Declaration** (Certification from the person seeking assistance when no other documentation can be obtained and client completes and signs form documenting homeless status/dates they experienced homelessness)

Already available documentation:

- Discharge paperwork (e.g. paperwork when discharged from institutionalized setting where they resided less than 90 days, such as jail, hospital, treatment facility, etc.)
- HMIS record: (may include any of the following: current project enrollments/shelter stay, recent outreach contact, recent service transactions)

Documentation types in order of priority for households who are at **Fleeing/Attempting to Flee DV**:

- A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
- For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
- Certification that no subsequent residence has been identified; and
- Self-Certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

STANDARDS SPECIFIC TO HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

ELIGIBILITY: STATUS AS HOMELESS OR AT-RISK OF HOMELESSNESS

Individuals/families, who meet the HUD criteria for the following definitions, are eligible for Homelessness Prevention assistance:

HOMELESSNESS PREVENTION

- At Risk of Homelessness
- Homeless Category 2: Imminently at-risk of homelessness
- Homeless Category 3: Homeless under other federal statute and
- Homeless Category 4: Fleeing/attempting to flee DV (as long as the individuals/families fleeing or attempting to flee DV are **not** also literally homeless. If the individuals/families are also literally homeless they would actually qualify for rapid re- housing instead. See below.)

Additional eligibility requirements related to Homelessness Prevention include:

- **Proof of residence** within the City of Gary corporate limits service area. A map for reference is included in Appendix F.
- **Total household income at 30 percent or below of Area Median Income (AMI)** for the area at initial assessment. Clients must provide documentation of household income, including documentation of unemployment and zero income affidavit for clients without income.

RAPID RE-HOUSING

Individuals/families, who meet the HUD criteria for the following definitions, are eligible for Rapid Re-Housing assistance:

- Homeless Category 1: Literally homeless
- Homeless Category 4: Fleeing/attempting to flee DV (as long as the individuals/families fleeing or attempting to flee DV are **also** literally homeless).

For additional details related to the HUD definition of At Risk of Homelessness and applicability of these definitions to each program component, see Appendix B and C.

ELIGIBILITY: INTAKE AND ASSESSMENT

Coordinated Access will be used for all housing interventions. Subrecipients are required to participate in the centralized or coordinated assessment and intake system (HMIS).

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Subrecipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing as set forth at 24 CFR § 576.401(a). These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under § 576.400(d) and the written standards established under § 576.400(e).

The standard assessment accounts for length and frequency of homelessness, physical and mental health status, criminal history, veteran status, domestic violence experience, substance abuse conditions and employment history.

After the initial evaluation, the type and amount of assistance will be established to ensure the individual or family's needs are met to regain stability. Note: An eviction notice, and proof of income alone are not enough to determine eligibility and appropriateness for ESG.

Subrecipients are expected to include documentation on the results of the eligibility assessment in the case file and what program component, Homeless Prevention or Rapid Rehousing, individuals and/or families are being assisted with.

The SUBRECIPIENT must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every three (3) months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance as outlined in 24 CFR § 576.401(b). At a minimum, each re-evaluation of eligibility must establish that:

- i. The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- ii. The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

The SUBRECIPIENT may require each program participant receiving homelessness prevention or rapid re-housing assistance to notify the recipient SUBRECIPIENT regarding changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the SUBRECIPIENT must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

Limited English Proficiency - Executive Order 13166: Limited English Proficiency is a Federal mandate that requires grantees of federal financial assistance to provide "meaningful access" to applicants and

beneficiaries of their programs who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English.

Identification - The ESG and CoC Interim Rules do not require identification as a condition to apply for or receive homeless assistance. HUD requires only that all program participants meet the minimum eligibility criteria and that grantees comply with all local and federal requirements. Further, HUD strongly encourages grantees to adopt Housing First practices and remove unnecessary barriers to receiving assistance, including requiring identification.

The client may, however, need identification to secure and/or maintain housing. In this situation agencies should help the client to obtain identification. ESG funds may be used to pay for primary documents, such as driver's licenses or birth records, only when the primary documents are necessary for a program participant to obtain and/or maintain housing.

Client signatures - The ESG Interim Rule does not specifically address requirements regarding client signatures and does not require grantees to disqualify individuals or families based on inconsistent signatures, nor does it require identification as a condition to apply for or receive homeless assistance. HUD requires only that all program participants meet the minimum eligibility criteria and that grantees comply with all local and federal requirements. Further, HUD strongly encourages grantees to adopt Housing First practices and remove unnecessary barriers to receiving assistance. The fact that a program participant has used multiple signatures, even if those signatures do not match, should not affect their eligibility for ESG rental assistance. Using a preferred name is a way to affirm one's gender identity. A way to accommodate program participants who use a preferred name is to include a field on intake forms for both "legal name" as well as "preferred name".

Informed Consent - Clients must be informed about their rights regarding personal information and sign consent forms:

- Informed Consent form, with accompanying Terms of Service form. By signing this form, the client consents to provide information necessary for determining eligibility and providing services.
- Authorization for Use and Sharing of Information. By signing this form, the client consents to have selected information shared with other providers in order to obtain other services or to coordinate care.

Citizenship Status - Verification of U.S. Citizenship or eligible immigration status is required for Homeless Prevention. Individuals of households who refuse to fill out the Declaration of Section 214 form and provide supporting documentation or submit proof of citizenship will be deemed ineligible members of the household.

Subrecipients may use the Declaration of Section 214 and supporting documentation or provide U.S. Identification that verifies citizenship. All adults in the household must sign the form. Parent/Guardian must sign the form for family member(s) under 18 years of age. (They DO NOT sign child's name, they sign their own name). In addition, for family members with different citizenship status, complete a separate form for each citizenship status.

Examples of documents that can be used to verify citizenship include the following:

- Social Security Card
- Birth certificate
- Religious document
- U.S. Passport
- Adoption Papers
- Military Records if it shows where born
- Certificate of Naturalization (USCIS Form N-550)
- Certification of U.S. Citizenship (USCIS Form N-560 or N-561)
- Certification of Birth Abroad of a U.S. Citizen (USCIS Form FS-240 or FS-545).
- U.S. Citizen Identification Card (USCIS Form I-197)

Notes: A voter's registration card is not acceptable verification for proof of citizenship when citizenship is questionable since an individual is not required to verify citizenship to register to vote.

(See the Declaration of Section 214 for a list of eligible immigration statuses for non-citizens and required supporting documents.)

ESG benefits cannot be provided to a household member who is not a citizen or does not have an eligible immigration status but may be provided to the other household members. Instead, a prorated benefit would be paid to the household. For example, if the household consists of five members and one is not a citizen or does not have an eligible immigration status, the household would receive 4/5 of the rental assistance it would otherwise receive.

All other eligibility requirements must be verified for every household member, regardless of citizenship status.

Street outreach, emergency shelter, safe haven, and Rapid Rehousing meet the Congressionally recognized 3-part test exceptions to protect life or safety and are therefore not subject to the Act's immigration-based restrictions AND THEREFORE, do not need to prove citizenship or sign 214 form either.

TARGETED POPULATIONS: CLIENT PRIORITIZATION

HOMELESSNESS PREVENTION

Note that all targeted individuals and families described below have to meet the minimum HUD requirements for eligibility to HP.

For purposes of ESG, HUD allows various types of documentation, ranging from third party verification to applicant self-declaration. Minimum acceptable types of documentation vary depending on the particular housing status and circumstance being documented. General documentation standards, in order of priority, are as follows:

Documentation types in order of priority for households who are at **Imminent Risk of Homelessness**:

- a. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
- b. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
- d. Certification that no subsequent residence has been identified; and
- e. Self-Certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

RAPID RE-HOUSING

The City of Gary may provide assistance to individuals who are currently homeless but not in need of permanent supportive housing as eligible for rapid re-housing. This can include, but is not limited to individuals and households who:

- are first time homeless;
- have few recent episodes of homelessness; or
- are part of a family that is homeless.

It should be noted, rapid re-housing funds are directed to individuals with income or work history and skills that indicate employability.

FINANCIAL ASSISTANCE

DURATION AND AMOUNT OF ASSISTANCE

The City of Gary will determine the types of assistance and the amount on a case-by-case basis with consultation with CoC, the shelter providers, and other agencies. All clients are assessed to determine initial need and create a budget to outline planned need for assistance. Agencies cannot set organizational maximums or minimums but must rely on the CoC wide tools to determine household need. Through case management, client files are reviewed monthly to ensure that planned expenditures for the month validate financial assistance request. The City of Gary expects that households will receive the minimum amount of assistance necessary to stabilize in housing. The amount will reflect ability to pay, program dollars available, number of applicants planned to be served, and the program end date. The City will use the following as a guideline for assistance:

- Unsheltered homeless (for individuals living on the street only): Costs for Emergency health and mental health services and cost of program participant's travel on public transportation.
- Rental Application fees: amount of rental housing application fee charged by the owner.
- Security Deposits: cannot exceed rent reasonableness standards as established by HUD
- Utility Payments/Utility Deposit: Maximum permitted one month.
- Moving cost Assistance: will be reviewed on a case-by-case basis. Moving cost may include truck rental for self-hauling option.
- Storage Fees: maximum of 3 months, but not to exceed \$300.00 (no arrears)
- Short-term rental assistance: cannot exceed three (3) months
- Medium-term rental assistance: cannot exceed twelve (12) months and must be reviewed every three months.
- Rental Arrears: One-time payment for up to six (6) months including any late fees on those arrears and cannot exceed both rent reasonableness and fair market rate.
- Use with other subsidies: Rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or is living in a housing unit receiving project-based rental assistance or operating assistance through other public sources.
- Rental Restrictions: Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD and complies with HUD's standard of rent reasonableness.
- Duplication of services: No program participant shall be provided duplication of services by organizations receiving ESG funds. A check in the HMIS system should determine if a program participant has received or is in the process of receiving assistance through another organization. Communication must be made between organizations if a program participant attempts to receive duplicated assistance.
- Cost of enrollment in other training programs which enhance employment, money management/budgeting as determined by case management.

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PARTICIPANT SHARE

Participant share will be determined by use of common assessment and budgeting tools. Clients will participate in the development of their individual housing plan with a case manager based on client goals and shared goals for achieving housing stability. Financial assistance is available for households with zero income.

HOUSING STABILIZATION AND RELOCATION RELATED ASSISTANCE AND SERVICES

REQUIRED SERVICES: CASE MANAGEMENT & CASE LOADS

Assistance through the Emergency Solutions Grants (ESG) program is intended to be provided as a part of a system-wide approach. In order to evaluate and coordinate services to the greatest extent possible, ESG grantees and subrecipients providing ESG-funded rental assistance or housing and relocation services under the Rapid Re-Housing and/or Homelessness Prevention components must:

- Develop a plan with each program participant on how they will retain permanent housing after the ESG assistance ends (see 24 CFR 576.401(e)(1)(ii)).
- Require program participants to meet with a case manager not less than once per month while they are receiving ESG-assistance to implement the plan and monitor progress towards housing stability (see § 576.401(e)(1)(i)).
- Assist program participants in obtaining appropriate supportive services, as well as connecting them to other federal, state, local, and private benefits and services for which they may be eligible. This includes, but is not limited to, Medicaid, SNAP, WIC, unemployment insurance, SSI/SSDI, services for veterans, and TANF (see § 576.401(d)).
- Have written policies and procedures for coordination among different providers of services in the community. Activities must be coordinated and integrated to the maximum extent practicable (see § 576.400(e)(3)(v)).

The approach to case management described above is required when providing any amount of Rapid Re-Housing or Homelessness Prevention assistance, even when just a one-time payment of rent/utility arrears is being provided. In this instance, a single case management session may meet the program's requirements so long as the housing plan can be established and the referrals to mainstream resources can be completed during the initial intake meeting. The grantee or subrecipient may require the program participant to attend additional follow-up meetings as a condition of receiving assistance.

Housing and Services/Stabilization Plan - Housing and services plan should be completed for all participants that receive an initial intake evaluation, if necessary. The plan is intended to be a guide for

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both the participant and the subrecipients. It should focus on obtaining or maintaining housing with defined goals, outcomes and timelines. The plan should also identify needed community resources, referrals to partnering agencies especially for mainstream benefits, budget education and tenant education.

Obtaining or maintaining stable housing is a likely primary goal and other steps needed to achieve housing stability (such as employment or needed supports) are likely related goals. Plans must be developed with full involvement from household members and should start with a strength's assessment. Case managers should build plans around the client's own goals. Service needs may include: mental health, substance abuse, domestic violence, education, employment, and health care. The plan should assist the program participant in retaining permanent housing after the ESG assistance ends.

Participants must be assisted, as needed, in obtaining appropriate supportive services such as medical or mental health treatment or services essential for independent living including mainstream benefits (Medicaid, SSI, SSDI, SNAP, WIC, LIEAP etc.)

In addition to assessing and documenting income and the current housing situation of applicant households, the agencies must also assess and document that the household would become homeless **but for** the ESG assistance. This includes assessing and documenting a household's support networks, monthly budget of expenses, financial resources and other housing options.

Providing ESG Case Management Services without Rental or Financial Assistance - Under the Rapid Re-Housing and Homelessness Prevention components, ESG funds can be used for case management services (or other services) alone. That is, although rental assistance cannot be provided independent of case management services, case management can be provided independent of rental assistance. For example, services (such as case management) could be provided after the term of a program participant's rental assistance expires, as long as the 24-month cap for each type of assistance is not exceeded.

ESG "stand alone" case management or other services can also be provided to support program participants who receive rental assistance through non-ESG programs, as long as the individual or family is eligible for ESG assistance at the time of the intake evaluation and any recertification(s) of eligibility.

Limitation on Housing Stability Case Management Under the Rapid Re-Housing Component - Often, households that are eligible for Rapid Re-Housing assistance reside in an emergency shelter or in a place not meant for human habitation while they wait for a unit to be identified. The following principles for

charging the costs of housing stability case management under Rapid Re-Housing apply in these situations:

- Grantees/subrecipients may provide housing stability case management assistance under the Rapid Re-Housing component for up to 30 days during the period these program participants are residing on the street or in an emergency shelter and seeking permanent housing (see § 576.105(b)(2)).
- If the program participant needs more than 30 days of housing stability case management assistance while they are sleeping in an emergency shelter or on the street (or other place not meant for human habitation), it must be charged either to Emergency Shelter: essential services or Street Outreach: case management, as appropriate. The costs are then subject to the cap on these components.
- Once the program participant is in permanent housing, housing stability case management can be provided under the Rapid Re-Housing component for up to 24 additional months.

Homelessness prevention clients must have an initial home visit when first approved for assistance and subsequent house visits with each recertification every three months. It is expected that case managers will conduct office visits with homelessness prevention clients between home visits, at least once per month. Case managers and program managers are encouraged to provide more than the minimum required services through case management.

Case management includes home and office visits determined by client need and supported by the housing plan.

As required by the Continuum of Care Housing Models, case managers are expected to follow up with clients that have successfully exited rapid re-housing case management at a minimum of 30 days after exiting the program. Clients who remain in housing for 90 days after exiting rapid re-housing, identified through HMIS, are categorized as stably housed.

Case management staff must have an updated copy of the Rental Assistance Agreement and ensure that the fiscal agent is informed of any changes to the participant rent share as indicated in the Housing Stabilization Plan.

REQUIRED SERVICES: INSPECTION AND LANDLORD AGREEMENT

Any unit that receives financial assistance through rapid re-housing must meet minimum habitability standards as outlined in the ESG regulations. The inspections will be conducted by the subrecipient.

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Any unit that receives rental assistance payments through rapid re-housing must have a rental lease agreement in place between the tenant and the landlord. The rental assistance lease agreement details the terms under which rental assistance will be provided.

INELIGIBLE SERVICES: CREDIT REPAIR AND LEGAL SERVICES

The City of Gary will not allow ESG funds to be used for credit repair and legal services to be eligible activities. The City of Gary has found limited access to this resource by clients and providers and will instead encourage the use of mainstream service providers and establish them as part of the system of providers with formal relationships.

OPTIONAL SERVICES: SECURITY/UTILITY DEPOSITS

Rental and utility deposits can be included in housing stabilization services as dictated by the housing stabilization plan. Rental and utility deposits can be included in lieu of or in combination with rental assistance for a unit. Security deposits can cover up to two months of rent.

OPTIONAL SERVICES: RENTAL APPLICATION FEES

The City of Gary expects that rapid re-housing navigation and location specialists will work closely with housing providers and establish trusting relationships among landlords in a way that will encourage property owners and managers to waive application fees for rental properties. To that end, application fees can only be provided for one application at a time; but note that this only limits the number of applications that require application fees. Case managers and housing specialists can and should work with clients and landlords to process as many free applications as possible.

ELIGIBILITY: PERIODIC RE-CERTIFICATION


All case managers are required to re-certify clients based on the following schedule. At that time, a case manager may decide to extend, decrease or discontinue providing assistance.

Program Component	Schedule	Re-certification Criteria
Homelessness Prevention	Every 3 months	For both HP and RRH, to continue to receive assistance, clients must <ul style="list-style-type: none"> • be at or below 30% AMI AND • lack sufficient resources and support networks necessary to retain housing without ESG assistance. Families are required to provide information on income, assets greater than \$5,000, deductions, and family composition during the annual recertification process.
Rapid Re-Housing	Annually	

APPENDIX A: HUD DEFINITION FOR HOMELESS AND RECORDKEEPING REQUIREMENTS

HUD CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	<p>(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	<p>(2) Individual or family who will imminently lose their primary nighttime residence, provided that:</p> <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	<p>(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	<p>(4) Any individual or family who:</p> <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing

RECORDKEEPING REQUIREMENTS


	Category 1	Literally Homeless	<ul style="list-style-type: none"> • Written observation by the outreach worker; <u>or</u> • Written referral by another housing or service provider; <u>or</u> • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; • For individuals exiting an institution¹-one of the forms of evidence above <u>and</u>: <ul style="list-style-type: none"> ○ discharge paperwork <u>or</u> written/oral referral, <u>or</u> ○ written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution
	Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> • A court order resulting from an eviction action notifying the individual or family that they must leave; <u>or</u> • For individual and families leaving a hotel or motel-evidence that they lack the financial resources to stay; <u>or</u> • A documented and verified oral statement; <u>and</u> • Certification that no subsequent residence has been identified; <u>and</u> • Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
	Category 3	Homeless under other Federal statutes	<ul style="list-style-type: none"> • Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u> • Certification of no PH in last 60 days; <u>and</u> • Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u> • Documentation of special needs <u>or</u> 2 or more barriers
	Category 4	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> • <i>For victim service providers:</i> <ul style="list-style-type: none"> ○ An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • <i>For non-victim service providers:</i> <ul style="list-style-type: none"> ○ Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u> ○ Certification by the individual or head of household that no subsequent residence has been identified ; <u>and</u> ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

**APPENDIX B: HUD DEFINITION FOR AT RISK OF HOMELESSNESS AND
RECORDKEEPING REQUIREMENTS**

HUD CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	Category 1	Individuals and Families	<p>An individual or family who:</p> <ul style="list-style-type: none"> (i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u> (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; <u>AND</u> (iii) Meets one of the following conditions: <ul style="list-style-type: none"> (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u> (B) Is living in the home of another because of economic hardship; <u>OR</u> (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u> (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u> (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u> (F) Is exiting a publicly funded institution or system of care; <u>OR</u> (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan
	Category 2	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
	Category 3	Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

RECORDKEEPING REQUIREMENTS



	Category 1	Individuals and Families	Intake and certification form meeting HUD specifications to verify "at risk of homelessness" status; (i) Documentation for determining annual income; (ii) Certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; e.g., family, friends, faithbased or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in § 576.2; (iii) The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition. Acceptable evidence includes: (A) Source documents (e.g., notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears); (B) To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(iii) of the definition of "at risk of homelessness" in § 576.2; or (C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; and (iv) The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in § 576.2. Acceptable evidence includes: (A) Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (e.g., eviction notice, notice of termination from employment, bank statement); (B) To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of "at risk of homelessness"; or (C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence.
	Category 2	Unaccompanied Children and Youth	Certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 <i>et seq.</i>), the Head Start Act (42 U.S.C. 9831 <i>et seq.</i>), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e <i>et seq.</i>), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 <i>et seq.</i>), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 <i>et seq.</i>), as applicable.
	Category 3	Families with Children and Youth	Certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 <i>et seq.</i>), the Head Start Act (42 U.S.C. 9831 <i>et seq.</i>), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e <i>et seq.</i>), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 <i>et seq.</i>), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 <i>et seq.</i>), as applicable.

APPENDIX C: CROSS WALK OF HUD HOMELESS AND AT RISK DEFINITIONS AND ELIGIBILITY TO ESG PROGRAM COMPONENTS

Eligibility by Component	Emergency Shelter	<p>Individuals and families defined as Homeless under the following categories are eligible for assistance in ES projects:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless • Category 2: Imminent Risk of Homeless • Category 3: Homeless Under Other Federal Statutes • Category 4: Fleeing/Attempting to Flee DV
	Rapid Re-Housing	<p>Individuals and families defined as Homeless under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless • Category 4: Fleeing/Attempting to Flee DV (if the individual or family is also literally homeless)
	Homelessness Prevention	<p>Individuals and families defined as Homeless under the following categories are eligible for assistance in HP projects:</p> <ul style="list-style-type: none"> • Category 2: Imminent Risk of Homeless • Category 3: Homeless Under Other Federal Statutes • Category 4: Fleeing/Attempting to Flee DV (if the individual or family is NOT also literally homeless) <p>Individuals and families who are defined as At Risk of Homelessness</p> <p>Additionally, HP projects must only serve individuals and families that have an annual income BELOW 30% AMI</p>

APPENDIX D: ELIGIBILITY CRITERIA AND PRIORITIZATION TOOL FOR HOMELESSNESS PREVENTION SYSTEM

ELIGIBILITY REQUIREMENTS

All potential clients will be screened for the following:

Income – Only households with income below 30% of the Area Median Income are eligible for Homelessness Prevention services (see Attachment A for income limits)

PLUS

Trigger Crisis – An event has occurred which is expected to result in housing loss within 30 days due to one of the listed reasons (see Attachment B for qualifying trigger crises)

PLUS

No resources or support network to prevent homelessness –No other options are possible for resolving this crisis. “But for this assistance” this household would become literally homeless—staying in a shelter, a car, or another place not meant for human habitation

OR

Unaccompanied children and youth who qualify as homeless under another Federal statute – See Runaway and Homeless Youth Act definition or Documentation for school district certification of homelessness (see Attachment C for other definitions of homelessness)

OR

Families with children or youth who qualify as homeless under another Federal statute –See Runaway and Homeless Youth Act definition or Documentation for school district certification of homelessness (see Attachment C for other definitions of homelessness)

APPENDIX E: EMERGENCY TRANSFER PLAN FOR VICTIMS OF DOMESTIC VIOLENCE, DATING VIOLENCE, SEXUAL ASSAULT, OR STALKING

EMERGENCY TRANSFERS

[Insert name of ESG Subrecipient or Provider], ESG Provider, is concerned about the safety of its Program Participants who receive rental assistance, and such concern extends to the Program Participants who have experienced domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),¹ ESG Provider allows Program Participants who have experienced domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the Program Participant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.² The ability of ESG Provider to honor such request for Program Participants currently receiving assistance, however, may depend upon a preliminary determination that the Program Participant is or has experienced domestic violence, dating violence, sexual assault, or stalking, and on whether ESG Provider has another dwelling unit that is available and is safe to offer the Program Participant for temporary or more permanent occupancy.

This plan identifies Program Participants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to Program Participants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that Emergency Solutions Grants is in compliance with VAWA.

ELIGIBILITY FOR EMERGENCY TRANSFERS

A Program Participant who has experienced domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if the Program Participant reasonably believes that there is a threat of imminent harm from further violence if the Program Participant remains within the same unit. If the Program Participant has experienced sexual assault, the Program Participant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer.

¹ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

² Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

A Program Participant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan.

Program Participants who are not in good standing may still request an emergency transfer if they meet the eligibility requirements in this section.

EMERGENCY TRANSFER REQUEST DOCUMENTATION

To request an emergency transfer, the Program Participant shall notify Housing Provider's management office and submit a written request for a transfer to **[ESG Subrecipient or Provider to insert location]**.

ESG Provider will provide reasonable accommodations to this policy for individuals with disabilities. The Program Participant's written request for an emergency transfer should include either:

1. A statement expressing that the Program Participant reasonably believes that there is a threat of imminent harm from further violence if the Program Participant were to remain in the same dwelling unit assisted under the ESG Provider's program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant's request for an emergency transfer.

ESG Provider must keep records of all requests and outcomes of such requests.

EMERGENCY TRANSFER CONFIDENTIALITY

The ESG Provider will keep confidential any information that the Program Participant submits in requesting an emergency transfer, and information about the emergency transfer, unless the Program Participant gives ESG Provider written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the Program Participant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the Program Participant. See the Notice of Occupancy Rights under the Violence Against Women Act for All Program Participants for more information about HP's responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

EMERGENCY TRANSFER TIMING AND AVAILABILITY

ESG Provider cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. ESG Provider will, however, act as quickly as possible to move a Program Participant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a Program Participant reasonably believes a proposed transfer would not be safe, the Program Participant may request a transfer to a different unit. If a unit is available, the transferred Program Participant must agree to abide by the terms and conditions that govern occupancy in the unit to which the Program Participant has been transferred. ESG Provider may be unable to transfer a Program Participant to a particular unit if the Program Participant has not or cannot establish eligibility for that unit.

If ESG Provider has no safe and available units for which a Program Participant who needs an emergency is eligible, ESG Provider will assist the Program Participant in identifying other housing providers who may have safe and available units to which the Program Participant could move. At the Program Participant's request, ESG Provider will also assist Program Participants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

If ESG Provider assists through project-based rental assistance and if a Program Participant qualifies for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, that Program Participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided. For families receiving tenant-based rental assistance, the following actions will be taken for the non-transferring family member(s), if the family separates in order to effect an emergency transfer: **[ESG Subrecipient or Provider insert actions here]**.

EMERGENCY TRANSFER SAFETY AND SECURITY OF PROGRAM PARTICIPANTS

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the Program Participant is urged to take all reasonable precautions to be safe.

Program Participants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or visit the online hotline at <https://www.thehotline.org/> or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY).

Program Participants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE, or visit the online hotline at <https://www.rainn.org/>

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Program Participants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://victimsofcrime.org/stalking-resource-center/>.

Program Participants who are or have been victims of domestic violence and are looking for assistance or are seeking shelter may seek help at <https://www.domesticshelters.org/help/in>.

For questions regarding VAWA, and/or if you need to move due to domestic violence, dating violence, sexual assault, or stalking please contact the Gary Commission for Women at (219) 883-4155 for assistance in locating other available housing (note, this is not a domestic violence hotline). Depending on your location, the Gary Commission for Women may also have a listing of local service providers and advocates who can help you move to a safe and available unit.

ATTACHMENT A – 30% AREA MEDIAN INCOME (EFFECTIVE 06/15/2023)

Income Level	1 Person	2 Persons	3 Persons	4 Persons	5 Persons	6 Persons	7 Persons	8 Persons
0 - 30%	\$18,800	\$21,450	\$24,150	\$26,800	\$28,950	\$31,100	\$33,250	\$35,400

ATTACHMENT B – OTHER DEFINITION OF HOMELESSNESS

- Runaway and Homeless Youth Act (42 U.S.C 5701 et seq.)
Runaway and Homeless Youth funding is administered by the Family and Youth Services Bureau within the Administration for Children & Families (ACF) of the U.S. Department of Health and Human Services (HHS). Information about Runaway and Homeless Youth program grantees is available online at <https://www.acf.hhs.gov/fysb/programs/runaway-homeless-youth>
- Head Start Act (42 U.S.C. 9831 et seq.)
Head Start funding is administered by the Office of Head Start (OHS) within ACF/HHS. A listing of Head Start programs, centers, and grantees is available online at <http://eclkc.ohs.acf.hhs.gov/hslc/HeadStartOffices>
- Violence Against Women Act of 1994; subtitle N (42 U.S.C. 14043e et seq.)
Violence Against Women Act established the Office on Violence Against Women (OVW) within the U.S. Department of Justice (DOJ). OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault, and stalking. Currently, OVW administers one formula grant program and eleven discretionary grant programs, all of which were established under VAWA and subsequent legislation. More information about OVW is available online at <https://www.justice.gov/ovw>
- Public Health Service Act; section 330 (42 U.S.C. 254b)
The Public Health Service Act authorized the Health Center Program, which is administered by the Bureau of Primary Health Care within the Health Resources and Services Administration (HRSA) of HHS. Information about local Health Centers can be found online at <http://bphc.hrsa.gov/index.html>
- Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.)
Food and Nutrition Act of 2008 relates to the Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps. SNAP is administered by the U.S. Department of Agriculture (USDA). More information about SNAP can be found online at <http://www.fns.usda.gov/snap/>
- Child Nutrition Act of 1966; section 17 (42 U.S.C. 1786)
Child Nutrition Act of 1966 authorized numerous programs related to school lunches and breakfasts and funds for meals for needy students. For more information about these programs, contact the local School Department.
- McKinney-Vento Act; subtitle B of title VII (42 U.S.C. 11431 et seq.)
McKinney-Vento Act authorized the McKinney-Vento Education for Homeless Children and Youths Program, which is administered via the Office of Elementary and Secondary Education within the U.S. Department of Education. More information about this program is available online at <http://www2.ed.gov/programs/homeless/index.html>. Also, contact the local School Department.



Emergency Solutions Grant Program Manual
Program Policies & Procedures

September, 2023

The manual and guides provide a basic overview of the Emergency Solutions Grant Program and its eligible activities and requirements. Policies and procedures may be updated as the need arises. They are not intended to replace existing guidance produced by HUD. Additional program information can be found at: <https://www.hudexchange.info/programs/esg/>



The City of Gary Community Development Department (CDD) is committed to providing all persons with equal access to its services, programs, activities, education, and employment regardless of race, color, national origin, religion, sex, familial status, disability, or age.

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SECTION 1: PROGRAM DESCRIPTION

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) was signed into law on May 20, 2009 and amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. Based on the Emergency Solutions Grant (ESG) regulations at 24 CFR Subpart F §576.500 the following policies were established and implemented by the City of Gary, Indiana. All subrecipients of ESG funds must implement, at a minimum, the following policies.

PURPOSE

The HEARTH Act of 2009 established funding through HUD, to support specialized housing services for the homeless. The intent of this program is to provide safe, decent and sanitary housing for homeless individuals, as well as connect those individuals with the supportive services they need to improve their situation and maintain permanent housing. The ESG program is established by Subtitle B of Title IV of the McKinney-Vento Homeless Assistance Act which authorizes the Department of Housing and Urban Development (HUD) to make grants for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re-housing assistance.

It effectively expanded ESG's eligible activities from traditional homeless shelter and outreach services to include rapid rehousing and targeted homeless prevention. The HEARTH Act also codifies into law the Continuum of Care planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs.

The ESG program objective is to assist individuals and families experiencing homelessness, or who are at risk of homelessness, to regain stability through services provided under the eligible activities outlined in this manual.

Agencies must comply with applicable laws and guidance including the requirements of:

- Housing and Urban Development (HUD) [Docket Number FR-5474-I-01]
- Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302)
- 24 CFR Part 91 Consolidated Submissions for Community Planning and Development Programs
- The HEARTH Act
- 2 CFR 200 - OMB Uniform Guidance
- HUD Eligibility Determination and Documentation Guidance

PROGRAM ADMINISTRATION

The City of Gary Community Development Department (CDD) administers these funds for the City of Gary, Indiana. CDD delegates the implementation to subrecipients; however, as the HUD grantee for this program, CDD is responsible for ensuring that subrecipients carry out activities in compliance with all applicable requirements. Subrecipients are responsible, whether they are providing services directly or through other subrecipients, for making sure that compliance with program requirements occur at all applicable levels.

CDD and the ESG subrecipient formalize the relationship through a contract. To complete the contract process, the subrecipient submits a proposal/application and a budget of eligible activities and/or line items.

MONITORING

Ultimately, the grantee is responsible for all activities and subrecipients funded with ESG, as well as responsible for ensuring that the respective subrecipients carry out activities in compliance with all applicable requirements. Effective management and oversight are a collaborative process among the grantee, subrecipient, and HUD and are important functions of CDD.

CDD monitors the subrecipient's participation in the program to ensure compliance with program regulations. Visits may be scheduled as a matter of routine or based on subrecipient performance, fiscal reporting, program reporting or other areas of concern. It should be noted that desk monitoring as well as on-site monitoring may be scheduled at any time to assure compliance.

Monitoring has these goals:

1. Ensure accountability;
2. Ensure effective and efficient use of resources;
3. Help assess response to community needs; and
4. Provide training and/or technical assistance.

There are two types of monitoring: desk monitoring, where casefiles and other information may be reviewed via mail, and on-site monitoring visits. Subrecipients are monitored based on a risk analysis using a combination of both approaches.

The monitoring visit: Before an on-site monitoring visit, the CDD Monitor may request certain documents to review in advance of the visit. Documents may include: case files, the most recent financial audit with management letter, budget, balance sheet, job descriptions of key employees of the organization, organizational chart, cash flow chart, income statement, program financial/draw records, accounting manual, board minutes, and any other documentation CDD may deem necessary to review grant compliance.

Upon scheduled arrival, an appropriate space will be provided by the subrecipient that allows for review of confidential client files, interviews with subrecipient staff, and reviews of any documentation that was not provided prior to the monitoring visit.

After each monitoring visit is complete, CDD will send correspondence documenting findings and/or concerns, project accomplishments, areas of deficiencies and technical assistance needs. These areas will be highlighted in the report and serves to confirm issues discussed during the review process and to give grantees notice of deficient areas requiring attention.

COORDINATION

CDD and subrecipients will coordinate and integrate, to the maximum extent practicable, ESG-funded programs with other programs targeted to homeless people in the area covered by the IN BOS Continuum of Care, Region 1A and the City of Gary to provide a strategic, community-wide system to prevent and end homelessness for the area, per 24 CFR 576.400(b).

The CDD and subrecipients will coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which homeless families and individuals may be eligible.

ESG program requirements are thus aligned with other formula programs and rental assistance programs to increase efficiency and coordination among the different programs. This framework will maximize community-wide planning and strategic use of resources to:

- Standardize eligibility determinations
- Prevent and end homelessness through direct funding to the most critical services to help people achieve long-term housing stability and avoid becoming homeless again
- Improve coordination and integration with mainstream services and focus on shortening homelessness
- Improve coordination within the community's homeless services including services funded by other programs targeted to homeless people
- Improving targeting of those most in need
- Improve data collection and performance measurement
- Allow the community to tailor its program to the particular strengths and challenges within that community
- The concept is to marshal available resources capitalizing on existing strength and increase efficiency

CONSULTATION WITH HOMELESS CONTINUUM OF CARE PROGRAMS

ESG regulations require program grantees (state and local governments) to regularly consult with the homeless Continuum of Care entity in their region to determine how to:

- Allocate ESG funds each program year
- Develop the performance standards and evaluate outcomes for projects and activities assisted by ESG funds
- Develop policies and procedures for HMIS Coordination with Other Targeted Homeless Services
- Coordinate and integrate ESG-funded activities with other homeless programs covered by the CoC to prevent and end homelessness for the area.
- These programs include:
 - Permanent Supportive Housing Program (24 CFR part 578.37(a)(1)(i))
 - CoC Rapid Rehousing (24 CFR part 578.37(a)(1)(ii))
 - HUD-Veterans Affairs Supportive Housing (HUD-VASH)
 - Education for Homeless Children and Youth Grants for State and Local Activities (Title VII-B of the McKinney-Vento Homeless Assistance Act)
 - Grants for the Benefit of Homeless Individuals (section 506 for the Public Health Services Act (42 USC 290aa-5))
 - Health Care for the Homeless (42 CFR part 51c) Programs for Runaway and Homeless Youth (42 USC 5701 et seq.)
 - Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc-21 et seq.));
 - Services in Supportive Housing Grants (section 520A of the Public Health Service Act);
 - Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 et seq.));
 - Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975));
 - Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021);
 - Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043);
 - VA Homeless Providers Grant and Per Diem Program (38 CFR part 61);
 - Health Care for Homeless Veterans Program (38 U.S.C. 2031);
 - Homeless Veterans Dental Program (38 U.S.C. 2062);
 - Supportive Services for Veteran Families Program (38 CFR part 62); and
 - Veteran Justice Outreach Initiative (38 U.S.C. 2031).

System and Program Coordination with Mainstream Resources: The grantee and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG funded activities with mainstream housing, health, social services,

employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible.

Examples of these programs include:

- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
- Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
- Supportive Housing for Persons with Disabilities (Section 811) (24 CFR part 891);
- HOME Investment Partnerships Program (24 CFR part 92);
- Temporary Assistance for Needy Families (TANF) (45 CFR parts 260–265);
- Health Center Program (42 CFR part 51c);
- State Children’s Health Insurance Program (42 CFR part 457);
- Head Start (45 CFR chapter XIII, subchapter B);
- Mental Health and Substance Abuse Block Grants (45 CFR part 96); and
- Services funded under the Workforce Investment Act (29 U.S.C. 2801 et seq.).

Centralized or Coordinated Assessment: Once the Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with requirements to be established by HUD, each ESG-funded program or project within the Continuum of Care’s area must:

- Use the CoC’s assessment system.
- Work with the Continuum of Care to ensure the screening, assessment and referrals of program participants are consistent with the Written Standards for Providing ESG assistance.

A victim service provider may choose not to use the Continuum of Care’s centralized or coordinated assessment system.

THE CONSOLIDATED PLAN

ESG is designed to be the first step in a continuum of assistance to prevent homelessness and to enable homeless individuals and families to move toward independent living as well as to prevent homelessness. The Consolidated Plan is designed to help states and local jurisdictions to assess their affordable housing and community development needs and market conditions, and to make data- driven, place-based investment decisions.

The consolidated planning process serves as the framework for a community-wide dialogue to identify housing and community development priorities that align and focus funding from the CPD formula block grant programs: Community Development Block Grant (CDBG) Program, HOME Investment Partnerships (HOME) Program), and **Emergency Solutions Grants (ESG) Program**.

The Consolidated Plan is carried out through Annual Action Plans, which provide a concise summary of the actions, activities, and the specific federal and non-federal resources that will be used each year to address the priority needs and specific goals identified by the Consolidated Plan. Grantees report on accomplishments and progress toward Consolidated Plan goals in the Consolidated Annual Performance and Evaluation Report (CAPER).

For more information on the City of Gary’s Consolidated Plan, visit [Consolidated Plans/Annual Action Plans/CAPERS | Community Development \(gary.gov\)](#)

SECTION 2: ALLOWABLE PROGRAM COMPONENTS AND ACTIVITIES

Funding is provided under this program for the following program components and will target two populations, (1) individuals and families who are experiencing homelessness and (2) individuals and families who are currently in housing but are at risk of becoming homeless. The regulations for the following ESG eligible activities can be found in 24 CFR 576.101 through 108.

1. Street Outreach
 - a. Essential Services
2. Emergency Shelter
 - a. Essential Services
 - b. Renovation
 - c. Shelter Operations
 - d. Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)
3. Homelessness Prevention
 - a. Housing Relocation and Stabilization Service
 - b. Short- Medium Term Rental Assistance
 - i. Tenant-Based Rental Assistance
 - ii. Project-Based Rental Assistance
4. Rapid Re-housing
 - a. Housing Relocation and Stabilization Service
 - b. Short- Medium Term Rental Assistance
 - i. Tenant-Based Rental Assistance
 - ii. Project-Based Rental Assistance
5. Homeless Management Information System (HMIS)
6. Ineligible Activities and Costs

STREET OUTREACH

Street Outreach services are provided on the street or in parks, abandoned buildings, bus stations, camp grounds and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities are also eligible costs. Eligible Program Participants are individuals and families who are homeless and living in a place not meant for human habitation.

Essential Services

Essential services are used to reach out to unsheltered homeless people; connect them with emergency shelter, housing or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Eligible Activities:

1. **Engagement Activities** - The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

Activities include:

- Making initial assessments of needs and eligibility

- Providing crisis counseling
- Addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries
- Providing information and referrals to programs targeted to homeless people, mainstream social services and housing programs (including emergency shelter, transitional housing, community-based services, permanent supportive housing and rapid re-housing).

Allowable costs include:

- Cell phone costs of outreach workers during the performance of these activities.

2. **Case Management** – The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant.

Activities include:

- Using a centralized or coordinated assessment system as required under § 576.400(d)
- Conducting the initial evaluation, which includes verifying and documenting eligibility, counseling, developing, securing and coordinating services, obtaining Federal, State and local benefits, monitoring and evaluating program participant progress, providing information and referrals to other providers, developing an individualized housing and service plan, including planning a path to permanent housing stability.

3. **Emergency Health Services** – Costs for the direct outpatient treatment of medical conditions that are provided by a licensed medical professional operating in community-based settings, including streets, parks and other places other unsheltered homeless people are living. *ESG funds may only be used for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.*

Eligible Treatment Activities:

- Assessing health problems and developing a treatment plan
- Assisting program participants to understand their health care needs
- Providing directly or assisting to obtain appropriate emergency medical treatment
- Providing medication and follow-up services.

4. **Emergency Mental Health services** – Costs for direct outpatient treatment by licensed professionals of mental health conditions operating in community- based settings, including streets, parks, and other places where unsheltered people are living. *ESG funds may only be used for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.*

Eligible Services:

- Application of therapeutic processes to personal, family, situational or occupational problems
- Eligible Treatment Activities:
- Crisis interventions
- Prescription of psychotropic medications
- Explanation about the use and management of medications
- Combinations of therapeutic approaches to address multiple problems.

5. **Transportation costs** –Costs associated with transporting unsheltered people to emergency shelters or other service facilities and travel by outreach workers, social workers, medical professionals, or other service providers provided that the travel takes place during the provision of services eligible under this section.

Allowable costs include:

- Program participant travel on public transportation
 - If service workers use their own vehicles, mileage allowance for service workers to visit program participants
 - The cost of purchasing or leasing a vehicle for the grantee or subrecipient and/or staff serving program participants and the cost of gas, insurance, taxes and maintenance for the vehicle
 - Travel cost to accompany or assist program participants to use public transportation.
6. **Services for special populations** - Services for homeless youth, victim services (assisting program participants who are victims of domestic violence, dating violence, sexual assault, or stalking) and for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs 1 – 5 of this section. Victim Services include services offered by rape crisis centers and domestic violence shelters and other organizations with a documented history of effective work concerning domestic violence, sexual assault or stalking.

EMERGENCY SHELTER

Subject to the expenditure limit in § 576.100(b), ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.

Essential Services

Essential Services are used to reach out to unsheltered homeless people; connect them with emergency shelter, housing or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Eligible Activities:

1. **Case Management** – The cost of assessing, arranging, coordinating and monitoring the delivery of individualized eligible services.
Activities include:
 - Using a centralized or coordinated assessment system
 - Conducting the initial evaluation including verifying and documenting eligibility
 - Counseling
 - Developing, securing and coordinating services
 - Obtaining Federal, State and local benefits
 - Monitoring evaluating program participant progress
 - Providing information and referral to other providers
 - Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
 - Developing an individualized housing and service plan, including planning a path to permanent housing stability
2. **Child Care** – Child care cost of children under the age of 13 unless the child is disabled. Disabled children must be under the age of 18. The child care center must be licensed by the jurisdiction in which it operates to be eligible.

Allowable costs include:

- Meals and snacks
- Comprehensive and coordinated sets of appropriate developmental activities.

3. **Educational Services** - When necessary for the program participant to obtain and maintain housing the costs of improving knowledge and basic educational skills are eligible.

Eligible Services include instruction or training in:

- Consumer education
- Health education
- Substance abuse prevention
- Literacy
- English as a second language
- General Educational Development

Component services or activities include:

- Screening, assessment, testing
- Individual or group instructions
- Tutoring
- Provision of books, supplies and instructional material
- Counseling
- Referral to community resources

4. **Employment assistance and job training** – Costs for employment assistance and job training programs.

Activities include:

- Classroom, online, and/or computer instruction
- On the job instruction
- Services that assist individuals in securing employment consist of
 - Employment screening, assessment or testing
 - Structured job skills and job seeking skills
 - Special training and tutoring including literacy training and prevocational training
 - Books and instructional material
 - Counseling or job coaching
 - Referral to community resources
- Acquiring learning skills which include skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
- Increasing earning potential

Allowable costs include:

- Reasonable stipends to program participants in employment assistance and job training.

5. **Outpatient Health Services** - Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. *ESG funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.*

Eligible Treatment:

- Assessing a program participant's health problems and developing a treatment plan
- Assisting participants understand their health needs

- Providing directly or assisting participants to obtain appropriate medical treatment, preventative medical care and health maintenance services, including emergency medical services
 - Providing medication and follow-up services
 - Providing preventive and non-cosmetic dental care
6. **Legal Services** - Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of City of Gary and by persons(s) under the supervision of the licensed attorney, regarding matters that interfere with the programs participant's ability to obtain and retain housing. Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services. *ESG funds may be used only for these services to the extent that other appropriate health services are unavailable within the community.*

Eligible subject matters:

- Child support
- Guardianship
- Paternity
- Emancipation
- Legal separation
- Orders of protection
- Other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking
- Appeal of veterans and public benefit claims denials
- Resolution of outstanding criminal warrants

Component Services or activities may include:

- Client intake
- Preparation of cases for trial
- Provision of legal advice
- Representation at hearings
- Counseling

Ineligible costs:

- Legal services for immigration and citizenship matters
- Issues relating to mortgages
- Retainer fee arrangements and contingency arrangements

7. **Life Skills Training** - The costs of teaching critical life management skills that may never have been learned or have been lost during physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community.

Component Life Skills training are:

- Budgeting resources
- Managing money
- Managing a household

- Resolving conflict
 - Shopping for food and needed items
 - Improving nutrition
 - Using public transportation
 - Parenting
8. **Mental Health Services** - Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management. Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions. *ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.*

Eligible Treatment consists of:

- Crisis intervention
 - Individual, family, or group therapy sessions
 - Prescription of psychotropic medications or explanations about the use and management of medications
 - Combinations of therapeutic approaches to address *multiple problems*.
9. **Substance Abuse treatment** - Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals. *ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.*

Eligible Treatment consists of:

- Client intake and assessment
- Outpatient treatment for up to 30 days

Allowable costs include

- Group and individual counseling
- Drug testing

Ineligible costs:

- Inpatient detoxification
- Other inpatient drug or alcohol treatment

10. **Transportation** - Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities.

Allowable costs include:

- Program participant travel on public transportation
- If service workers use their own vehicles, mileage allowance for service workers to visit program participants
- The cost of purchasing or leasing a vehicle for the grantee or subrecipient and/or staff serving program participants and the cost of gas, insurance, taxes and maintenance for the vehicle.
- Travel cost to accompany or assist program participants to use public transportation.

11. **Services for special populations** - To provide services for homeless youth, victim services (assisting program participants who are victims of domestic violence, dating violence, sexual assault, or stalking) and for people living with HIV/AIDS, so long as the costs of providing these services are eligible. Victim Services include services offered by rape crisis centers and domestic violence shelters and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault or stalking.

Shelter Renovation

Costs to renovate an emergency shelter. The emergency shelter must be owned by a government entity or private nonprofit organization.

Allowable costs include:

- Labor
- Materials
- Tools
- Other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter).

Renovated/Converted Buildings Minimum Period of Use: Each building renovated/converted with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation/conversion and the value of the building. The value of the building is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. A minimum period of use of 10 years, required for major rehabilitation and conversion, must be enforced by a recorded deed or use restriction. (See 576.102(c)(i)-(iii))

- Major rehabilitation. If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.
- Conversion. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum period of use is 10 years.
- Renovation other than major rehabilitation or conversion. In all other cases where ESG funds are used for renovation, the minimum period of use is 3 years.

Emergency Shelter and Housing Standards Requirements and Special Considerations § 576.403

Lead-based paint remediation and disclosure. The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821–4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851–4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

Minimum standards for emergency shelters. Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The grantee may also establish standards that exceed or add to these minimum standards.

1. **Structure and materials.** The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.
2. **Access.** The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35; where applicable.
3. **Space and security.** Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
4. **Interior air quality.** Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
5. **Water supply.** The shelter's water supply must be free of contamination.
6. **Sanitary facilities.** Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
7. **Thermal environment.** The shelter must have any necessary heating/cooling facilities in proper operating condition.
8. **Illumination and electricity.** The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
9. **Food preparation.** Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
10. **Sanitary conditions.** The shelter must be maintained in a sanitary condition.
11. **Fire safety.** There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

Minimum standards for permanent housing. The grantee or subrecipient cannot use ESG funds to help a program participant remain or move into housing that does not meet the minimum habitability standards provided in this paragraph (c). The grantee may also establish standards that exceed or add to these minimum standards.

1. **Structure and materials.** The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
2. **Space and security.** Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.
3. **Interior air quality.** Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
4. **Water supply.** The water supply must be free from contamination.
5. **Sanitary facilities.** Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
6. **Thermal environment.** The housing must have any necessary heating/cooling facilities in proper operating condition.

7. **Illumination and electricity.** The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
8. **Food preparation.** All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
9. **Sanitary conditions.** The housing must be maintained in a sanitary condition.
10. **Fire safety.**
 - a. There must be a second means of exiting the building in the event of fire or other emergency.
 - b. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.
 - c. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.

Shelter Operations

Costs to operate and maintain emergency shelters or to provide other emergency lodging, when appropriate.

Allowable costs include:

- Maintenance (including minor or routine repairs)
- Rent
- Security
- Fuel
- Equipment
- Insurance
- Utilities
- Food
- Furnishings and supplies
- Hotel/Motel Voucher (Where no appropriate emergency shelter is available for a homeless family or individual).

Assistance Required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA)

Eligible costs are the costs of providing URA assistance under 24 CFR 576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. Persons that receive URA assistance are not considered “program participants” for the purposes of this part, and relocation payments and other URA assistance are not considered “rental assistance” or “housing relocation and stabilization services” for the purposes of this part.

Prohibition against involuntary family separation: The age, of a child under age 18 must not be used as a basis for denying any family’s admission to an emergency shelter that uses ESG funding or services and provides shelter to families with children under age 18.

Essential Services and shelter operation funding considerations: Where the grantee or subrecipient uses ESG funds solely for essential services or shelter operations, the grantee or subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. These services or shelters are not limited to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g. families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the grantee or sub recipient originally provided the services or shelter.

Transitional Facilities

A transitional facility will only be eligible to receive ESG funds for Emergency Shelter Essential Services and Maintenance costs if:

1. It meets **BOTH** of the following criteria under the emergency shelter definition:
 - Its primary purpose is to provide a temporary shelter for the homeless in general or for specific populations of the homeless; and
 - It does not require occupants to sign leases or occupancy agreements;

OR

2. It received funds under a FY 2010 Emergency Shelter Grants grant and met the criteria under the former emergency shelter definition ("any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless").

Restrictions on Street Outreach and Emergency Shelter

Combined Street Outreach and Emergency Shelter expenditures are limited to 60 percent of the grantee's total 2010 ESG expenditures for Street Outreach and Emergency Shelter.

A unit of general-purpose local government is prohibited from using ESG Funds to replace funds the local government provided for emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general-purpose local government is in a severe financial deficit.

HOMELESSNESS PREVENTION (HP)

Homelessness prevention may be provided to individuals and families who meet the criteria under the "at risk of homelessness", or who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in Subsection 576.2. The cost of homelessness prevention is only eligible to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in the housing.

Housing relocation and stabilization services §576.105 and short- and/or medium-term rental assistance §576.106 may be provided to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition.

ESG financial assistance cannot be provided to a program participant receiving the same type of assistance for the same period of time from another public program.

Written standards for determining the amount of assistance are required (§576.400).

Conditions for using HP

Homeless Prevention services may be provided to those "At Risk of Homelessness" meeting one of the following conditions:

- (1) An individual or family who:
 - (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD at initial eligibility determination or at or below 30 percent at reassessment;

- (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low- income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the grantee's approved consolidated plan;
- (2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- (3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Homeless Prevention services may be provided to those “Homeless” meeting one of the following conditions:

Homeless Definition (2) Imminent Risk of Homelessness - An individual or family who will imminently lose their primary nighttime residence provided that:

- (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- (ii) No subsequent residence has been identified; and
- (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

Homeless Definition (3) Homeless under other Federal Statutes - Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

- (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- (iii) Have experienced persistent instability as measured by two moves or more during the 60- day period immediately preceding the date of applying for homeless assistance; and
- (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

Homeless Definition (4) Fleeing/Attempting to Flee Domestic Violence - Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

RAPID RE-HOUSING ASSISTANCE (RRH)

ESG funds may be used to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance may be provided to program participants who meet the criteria under paragraph (1) of the "homeless" definition in Subsection 576.2 or who meet the criteria under paragraph (4) of the "homeless" definition (where the individual or family also meets the criteria for paragraph 1).

Conditions for using RRH

Rapid Rehousing services may be provided to those "Homeless" meeting one the following conditions:

Homeless Definition (1) Literally Homeless - An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- (ii) An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
- (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

Homeless Definition (4) Fleeing/Attempting to Flee Domestic Violence - Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence; (where the individual or family also meets the criteria for paragraph 1).
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

ELIGIBLE ACTIVITIES FOR BOTH HP AND RRH

Rental Assistance Services

Homeless Prevention and Rapid-Re-Housing includes rental assistance and housing relocation and stabilization services. (Subject to the general conditions under Subsection §576.103 and §576.104)

Program participants may be provided up to 24 months of rental assistance during any three-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

The maximum amount of rental assistance provided and, an individual or family's level of responsibility for rent payments, over time, shall be determined by the ESG subrecipient and shall be reflective of the individual or family's need for rental assistance and the level of financial resources available to the ESG subrecipient.

Eligible Activities:

1. **Short-Term Rental Assistance:** Assistance for up to (3) months of rent. Designation of Short-Term Rental Assistance must take into consideration payment of Rental Assistance Arrears.
2. **Medium-Term Rental Assistance:** Assistance for more than 3 months but not more than 24 months of rent.
3. **Rental Assistance Arrears:** A one-time payment for up to 6 months of arrears and may include any late fees on those arrears but counts toward 24-month service period. An arrears payment is only an eligible cost if a tenant would actually be evicted for non-payment of their portion of the rent or utilities (Homelessness Prevention) or the arrears are preventing the household from obtaining permanent housing and achieving stability in that housing (Rapid Re-Housing). Months 1-3 are defined as Short-Term Arrears (or Short-Term Rental Assistance) Months 4-6 are defined as Medium Term Arrears (or Medium-Term Rental Assistance)
4. **Rental Assistance**-may be tenant-based or project-based

Tenant-based rental assistance

- 1) A participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the participant continues to meet the program requirements.
- 2) The subrecipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.
- 3) The rental assistance agreement with the owner must terminate and no further rental assistance payments shall be made if:
 - The program participant moves out of the housing unit for which the participant has a lease.
 - The lease terminates and is not renewed; or
 - The participant becomes ineligible to receive ESG rental assistance.

Project-based rental assistance

If the subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a participant is identified to lease the unit, the subrecipient may enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:

1. The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement ("assisted unit") may only be occupied by program participants, except as provided by item 4.
2. The subrecipient may pay up to 100 percent of the first month's rent, provided that a participant signs a lease and moves into the unit before the end of the month for which the first month's rent is paid. The rent paid before a program participant move into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's rental assistance.
3. The subrecipient may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant. When a participant moves out of an assisted unit, the subrecipient may pay the next month's rent, i.e., the first month's rent for a new program participant as provided in 2).
4. The participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the subrecipient must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the subrecipient may resume payments if the individual or family again becomes eligible and needs further assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG requirements.
5. The rental assistance agreement must have an initial term of one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number or months for which the program participant remains eligible. However, under no circumstances may the subrecipient commit ESG funds to be expended beyond the expenditure deadline (§ 576.203) or commit funds for a future ESG grant before the grant is awarded.

Special Considerations:

Discretion to set caps and conditions: The subrecipient may set a maximum amount or percentage of rental assistance that a participant may receive rental assistance, a maximum number of months that a participant may receive rental assistance, or a maximum number of times that a participant may receive rental assistance. The subrecipient may require program participants to share in the costs of rent. If so, it must be documented in the subrecipient's written policy and procedures manual.

Use with other subsidies: Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance or living in a housing unit receiving project-based assistance or operating assistance, through other public sources. Rental assistance may not be provided to a participant who has been provided with replacement housing payments under URA during the period of time covered by the URA payments.

Mobile Home Lot Rent

Paying for rent of a lot on which a mobile home (also known as a manufactured home) is located or for arrears of this rent is eligible as rental assistance under the ESG Homelessness Prevention component. All other program requirements pertaining to rental assistance still apply, including habitability standards, rent reasonableness, and Fair Market Rent (FMR). Some communities have FMRs for manufactured home spaces. If there are no FMRs for manufactured home spaces in the provider's area, the FMR requirement does not apply in this limited situation.

Please note, however, that ESG may only be used if the client is determined to be eligible for ESG.

Housing Relocation and Stabilization Services

Homeless Prevention and Rapid-Re-Housing includes rental assistance and housing relocation and stabilization services. (Subject to the general conditions under Subsection §576.103 and §576.104)

Eligible Activities:

1. **Rental Application Fees:** for the rental housing application fee that is charged by the owner to all applicants.
2. **Security Deposits:** that is equal to no more than 2 months' rent
3. **Last month's rent:** if necessary to obtain housing to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rent assistance, which cannot exceed 24 months during any 3-year period.
4. **Utility Deposits:** for a standard utility deposit required by the utility company for all customers for utilities listed in the utility payment section.
5. **Utility Payments:** may pay for up to 24 months (during any 3-year period) of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services: Gas, Electric, Water, Sewage

A household seeking utility only assistance may be eligible for ESG assistance if it can be documented that they will lose their housing and become literally homeless if utility assistance is not provided and the household meets other ESG eligibility requirements. In such cases, subrecipient must confirm and document in the case file that the utility company will in fact disconnect the utility service if the full amount or a partial payment is not paid, that the disconnection of utility service will cause housing to be unsafe or otherwise cause eviction (i.e. if the applicant is required to maintain utilities per their lease), and that no other utility assistance (i.e. LIEAP, Winter Warmth Program, or ESG) is available to prevent the shut-off. A copy of a utility shut-off notice or arrears statement is not sufficient by itself to document program eligibility. The household still has to meet all other eligibility requirements.

6. **Moving Costs:** such as truck rental or hiring a moving company. This may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant move into permanent housing. Payment of temporary storage fees in arrears is not eligible.
7. **Services Costs:** ESG funds may be used to pay the costs of providing the following services:
 - Assessment of housing barriers, needs and preferences
 - Development of an action plan for locating housing
 - Housing search
 - Outreach and negotiation with owners
 - Assistance with submitting rental applications and understanding leases

- Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for compliance with habitability and lead-based paint.
 - Assistance with obtaining utilities and making moving arrangement
 - Tenant counseling
8. **Housing search and placement:** necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:
- Assessment of housing barriers, needs, and preferences
 - Development of an action plan for locating housing
 - Housing search
 - Outreach to and negotiation with owners
 - Assistance with submitting rental applications and understanding leases
 - Assessment of housing for compliance with requirements for habitability and lead-based paint.
 - Assistance with obtaining utilities and making moving arrangement
 - Tenant counseling
9. **Housing Stability case management:** to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing.

Component Services and activities:

- Conducting the initial evaluation (required under subsection 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homeless prevention or rapid re-housing assistance.
- Counseling
- Developing, securing and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing and stability
- Conducting re-evaluations required under subsection 576.401(b).
- Mediation between the program participant and the owner or person(s) with whom the participant is living, providing that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside.
- Legal services as set forth in subsection 576.102 (a) (1) vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
- Credit repair for credit counseling and other services necessary to assist participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This does not include payment or modification of a debt.
- May be required to use a centralized or coordinated assessment system as required under Subsection 576.400 (d), to evaluate individuals and families applying for or receiving homeless prevention or rapid re-housing assistance.

Special Considerations:

Maximum amounts and periods of assistance: The subrecipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance. The subrecipient may also set a maximum period for which a program participant may receive any of the types of assistance or services. However, except for the housing stability case management, the total period for which any program participant may receive the services must not exceed 24 months during any 3-year period. The limits on the assistance apply to the total assistance an individual receives, either as an individual or as part of a family.

Use with other subsidies: Financial assistance cannot be provided to a participant who is receiving the same type of assistance through other public sources or who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

ADMINISTRATIVE COSTS

The total grantee (Community Development Department) funds that can be spent on administrative activities are 7.5% percent of the grantee's total ESG grant. Employee compensation and other overhead costs directly related to carrying out street outreach, emergency shelter, homelessness prevention, rapid re-housing and HMIS activities are eligible costs of those activities and not subject to the spending limit for administrative costs. Case Management costs should be charged as program costs as described as allowable in program eligible activities and are not to be considered administrative costs.

Eligible Activities

- Accounting for the use of grant funds
- Preparing reports for submission to HUD
- Obtaining program audits
- Grantee staff salaries associated with eligible administrative costs
- ESGP training for program administrator and case managers

Description: General management, oversight and coordination. Cost of overall program management, coordination, monitoring, and evaluation. These costs include but are not limited to:

- Salaries, wages and related costs of subrecipient staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the grantee may either include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities regarding the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. The grantee may use only one of these methods for each fiscal year grant.
- Program administration assignments include the following:
 - Preparing program budgets and schedules, and amendments to those budgets and schedules;
 - Developing systems for assuring compliance with program requirements;
 - Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities;
 - Monitoring program activities for progress and compliance with program requirements;
 - Preparing reports and other documents directly related to the program for submission to HUD;
 - Coordinating the resolution of audit and monitoring findings;
 - Evaluating program results against grantee objectives; and
 - Managing or supervising persons whose primary responsibilities regarding the program include such assignments as described in this section.

Allowable costs:

- Travel costs incurred for monitoring of subrecipients;

- Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and
- Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies and rental and maintenance (but not purchase) of office space.
- Training on ESG requirements
- Consolidated plan. Costs of preparing and amending the ESG and homelessness-related sections of the consolidated plan
- Environmental review. Costs of carrying out the environmental review responsibilities under subsection 576.407.

Employee Compensation and other Overhead Costs

Employee compensation and other overhead costs directly related to carrying out street outreach, emergency shelter, homelessness prevention, rapid re-housing and HMIS activities are eligible costs of those activities and not subject to the spending limit for administrative costs. Case Management costs should be charged as program costs as described as allowable in program eligible activities and are not to be considered administrative costs. Employee compensation and other overhead costs directly related to carrying out:

- Street Outreach
- Emergency shelter
- Homeless Prevention
- Rapid Re-housing
- And HMIS

All eligible program components are not subject to the Administration expenditure limit.

Indirect Costs

ESG may be used to pay indirect costs in accordance with OMB Uniform Administrative Requirements at 2 CFR 200.414), as applicable. Indirect costs (24 CFR 576.109) may be allocated to each eligible activity, so long as the allocation is consistent with an indirect cost rate proposal developed in accordance with OMB Uniform Administrative Requirements.

Expenditure limits: The indirect costs charged to an activity subject to an expenditure limit under subsection 576.100 must be added to the direct costs charged for that activity when determining the total cost subject to expenditure limit.

INELIGIBLE ACTIVITIES

The intent of ESG is to provide funding for housing or emergency shelter expenses to assist persons who are homeless or would be homeless if not for this assistance. Therefore, financial assistance or services to pay for expenses that are available through other public programs are not eligible. Case managers should work to link program participants to these other resources.

Mortgage Costs: ESG is not a mortgage assistance program. Financial assistance may not be used to pay for any mortgage costs or costs needed by homeowners to assist with any fees, taxes, or other costs of refinancing a mortgage to make it affordable. Legal costs associated with refinancing a mortgage are also excluded.

Other Ineligible Activities

In addition, ESG funds may not be used to pay for any of the following items:

- Credit card or other consumer debt
- Car repair or other transportation costs
- Participant travel costs
- Medical or dental care and medicines
- Clothing and grooming
- Home furnishings
- Pet care/ Pet fee
- Entertainment activities
- Child care
- Cash assistance to program participants
- Duplicating payments– using ESG funds and another source for exact same cost type for same time period
- Operations costs for housing programs
- Assistance longer than 24 months
- Direct payments to program participants
- Non-housing services, such as:
 - Food, household items, clothing
 - Furniture and appliances
- Discharge planning at institutions (hospitals, jails or prisons)
- Planning or developing new HMIS systems
- Development of New Software
- Contracting for program evaluation
- Certifications, Licenses and General Training Classes (e.g. for a case manager to gain credentials)
- Other costs defined as ineligible in the OMB Uniform Guidance

Section 3: DETERMINING ELIGIBILITY AND PROGRAM REQUIREMENTS

Eligibility to receive assistance under all ESG programs will be based on the guidelines outlined by HUD, Initially, by determining if the individual or family qualifies as “homeless” as defined in the HEARTH Act of 2009, SEC. 103, or at-risk of homelessness. Evaluation and eligibility policies and procedures are developed in accordance with the centralized or coordinated assessment requirements set forth under 24 CFR 576.400(d).

CLIENT INTAKE

An initial evaluation to determine program eligibility of individuals and/or families will be conducted by the subrecipients. Agencies are expected to include documentation on the results of the eligibility assessment in the case file and what program component, Homeless Prevention or Rapid Rehousing, individuals and/or families are being assisted with. If a participant is deemed ineligible to receive ESG assistance, subrecipients must document the reasons for denial and inform the applicant(s) in writing of the denial.

Subrecipients are required to participate in the centralized or coordinated assessment and intake system in their community.

After the initial evaluation, the type and amount of assistance will be established to ensure the individual or family’s needs are met to regain stability.

Note: An eviction notice, and proof of income alone are not enough to determine eligibility and appropriateness for ESG.

Limited English Proficiency

Executive Order 13166: Limited English Proficiency is a Federal mandate that requires grantees of federal financial assistance to provide “meaningful access” to applicants and beneficiaries of their programs who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English.

Identification

The ESG and CoC Interim Rules do not require identification as a condition to apply for or receive homeless assistance. HUD requires only that all program participants meet the minimum eligibility criteria and that grantees comply with all local and federal requirements. Further, HUD strongly encourages grantees to adopt Housing First practices and remove unnecessary barriers to receiving assistance, including requiring identification.

The client may, however, need identification to secure and/or maintain housing. In this situation agencies should help the client to obtain identification. ESG funds may be used to pay for primary documents, such as driver’s licenses or birth records, only when the primary documents are necessary for a program participant to obtain and/or maintain housing.

Client signatures

The ESG Interim Rule does not specifically address requirements regarding client signatures and does not require grantees to disqualify individuals or families based on inconsistent signatures, nor does it require identification as a condition to apply for or receive homeless assistance. HUD requires only that all program participants meet the minimum eligibility criteria and that grantees comply with all local and federal requirements. Further, HUD strongly encourages grantees to adopt Housing First practices and remove unnecessary barriers to receiving assistance. The fact that a program participant has used multiple signatures, even if those signatures do not match, should not affect their eligibility for ESG rental assistance. Using a preferred name is a way to affirm one's gender identity. A way to accommodate program participants who use a preferred name is to include a field on intake forms for both "legal name" as well as "preferred name".

Informed Consent

Clients must be informed about their rights regarding personal information and sign consent forms:

- Informed Consent form, with accompanying Terms of Service form. By signing this form, the client consents to provide information necessary for determining eligibility and providing services.
- Authorization for Use and Sharing of Information. By signing this form, the client consents to have selected information shared with other providers in order to obtain other services or to coordinate care.

Citizenship Status

Verification of U.S. Citizenship or eligible immigration status is required for Homeless Prevention. Individuals of households who refuse to fill out the Declaration of Section 214 form and provide supporting documentation or submit proof of citizenship will be deemed ineligible members of the household.

Subrecipients may use the Declaration of Section 214 and supporting documentation or provide U.S. Identification that verifies citizenship. All adults in the household must sign the form. Parent/Guardian must sign the form for family member(s) under 18 years of age. (They DO NOT sign child's name, they sign their own name). In addition, for family members with different citizenship status, complete a separate form for each citizenship status.

Examples of documents that can be used to verify citizenship include the following:

- Social Security Card
- Birth certificate
- Religious document
- U.S. Passport
- Adoption Papers
- Military Records if it shows where born
- Certificate of Naturalization (DHS Forms N-550 or N-570).
- Certification of U.S. Citizenship (DHS Forms N-560 or N-561).
- Certification of Birth Abroad of a U.S. Citizen (Form FS-240 or FS-545).
- U.S. Citizen Identification Card (Form I-197)

Notes: A voter's registration card is not acceptable verification for proof of citizenship when citizenship is questionable since an individual is not required to verify citizenship to register to vote.

See the Declaration of Section 214 for a list of eligible immigration statuses for non-citizens and required supporting documents.

ESG benefits cannot be provided to a household member who is not a citizen or does not have an eligible immigration status but may be provided to the other household members. Instead, a prorated benefit would be paid to the household. For example, if the household consists of five members and one is not a citizen or does not have an eligible immigration status, the household would receive 4/5 of the rental assistance it would otherwise receive.

All other eligibility requirements must be verified for every household member, regardless of citizenship status.

Street outreach, emergency shelter, safe haven, and Rapid Rehousing meet the Congressionally recognized 3-part test exceptions to protect life or safety and are therefore not subject to the Act's immigration-based restrictions AND THEREFORE, do not need to prove citizenship or sign 214 form either. Refer to [HUD's Fact Sheet](#) for more info

Staff Certification of Eligibility for ESG Assistance

The "Staff Certification of Eligibility for ESG Assistance" form (formally "Staff Affidavit") must be completed and signed by the person determining eligibility and his/her supervisor for all households determined eligible. A new Staff Certification form is only required if a different staff person re-certifies eligibility at a later date. Visit the forms section of this document or the [HUD Exchange website](#).

The "Staff Certification of Eligibility for ESG Assistance" form must be in every case file determined eligible or recertified.

HOUSING STATUS ELIGIBILITY/ORDER OF PRIORITY

The household's housing status must be determined at the time of application and every three (3) months for Homeless Prevention and annually for Rapid Re-housing as part of the re-certification requirement and documentation must be **in the case file**.

For each client, determine whether the client is: literally homeless; imminently losing their housing; unstably housed and at-risk of losing their housing; or stably housed at program entry and exit. For clients exiting a program, the Housing Status should reflect their housing status immediately after exiting the program as determined by the client's housing destination and anticipated housing stability.

Housing status is only changed in the HMIS system upon entry and exit of the ESG program. The following is a list of allowable Housing Status options:

- Rapid Re-Housing Option:
 - 1 = Literally homeless
- Homeless Prevention Option:
 - 2 = Imminently losing their housing
 - 3 = Unstably housed and at-risk of losing their housing
- Other Options at Exit:

- 4 = Stably housed
- 8 = Don't Know
- 9 = Refused

Housing Status Documentation:

But before providing assistance through ESG, the subrecipient **must determine and document** if the household has any other available options or resources that may prevent them from becoming literally homeless.

For all ESG applicants, documentation of the following must be in the case file:

- Other housing options (i.e., could they stay with a family member until they are able to move into a new unit or get their first paycheck?)
 - Assess and **document** all other appropriate housing options
 - Verify that no other housing options are available
 - Must be **documented** by ESG case manager or authorized staff
 - Include assessment summary or other statement indicating that applicant has no other appropriate housing options,
 - Be signed and dated by ESG case manager or other authorized ESG staff.
 - Include **documentation** indicating no other subsequent housing options in the case file.
- Support networks and financial resources to obtain immediate housing or remain in current housing.
 - Assess with applicant all financial resources AND support networks (i.e. friends, family or other personal sources of financial or material support)
 - Verify that applicant lacks financial resources and support networks to obtain other appropriate subsequent housing or remain in their housing.
 - Assessment Form or Other Documentation Must:
 - Be documented by ESG case manager or other authorized staff.
 - Include review of current account balances in checking and savings accounts held by applicant household.
 - Include assessment summary or other statement indicating that applicant lacks financial resources and support networks to obtain other appropriate subsequent housing or remain in their housing.
 - Be signed and dated by ESG case manager or other authorized ESG staff
 - Include **documentation** indicating insufficient financial resources and support networks in participant case file.

NOTE: Remember, specifically for housing status, determining eligibility can be a multi-level process; applicants must meet **ALL** criteria and evidence of this must be present in the case file.

ORDER OF PRIORITY

For purposes of ESG, HUD allows various types of documentation, ranging from third party verification to applicant self-declaration. Minimum acceptable types of documentation vary depending on the particular housing status and circumstance being documented. General documentation standards, in order of priority, are as follows:

Order of Priority when Obtaining Documentation of Homelessness

1. Documentation types in order of priority for households who are **Literally Homeless**:
 - a. **1st - Written Third-Party Documentation** (e.g. a letter on agency letterhead with specific dates of contact such as from an emergency shelter provider, landlord, etc.)
 - b. **2nd - Intake Worker Observations** (e.g. a letter on agency letterhead and/or form with intake worker signature documenting specific dates of contact; intake worker may include pictures in case file of where household is sleeping, if authorized to do so by household)
 - c. **3rd - Applicant Self-Declaration** (Certification from the person seeking assistance when no other documentation can be obtained and client completes and signs form documenting homeless status/dates they experienced homelessness)

Already available documentation:

- a. Discharge paperwork (e.g. paperwork when discharged from institutionalized setting where they resided less than 90 days, such as jail, hospital, treatment facility, etc.)
 - b. HMIS record: (may include any of the following: current project enrollments/shelter stay, recent outreach contact, recent service transactions)
2. Documentation types in order of priority for households who are at **Imminent Risk of Homelessness**:
 - a. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
 - b. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
 - c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
 - d. Certification that no subsequent residence has been identified; and
 - e. Self-Certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.
 3. Documentation types in order of priority for households who are at **Fleeing/Attempting to Flee DV**:
 - a. A court order resulting from an eviction action notifying the individual or family that they must leave within 14 days; or
 - b. For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
 - c. A documented and verified written or oral statement that the individual or family will be literally homeless within 14 days; and
 - d. Certification that no subsequent residence has been identified; and
 - e. Self-Certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing.

INCOME ELIGIBILITY

The City of Gary requires that all subrecipients use the HUD CPD's Income Eligibility Calculator, an interactive tool that makes determining the income eligibility and assistance amounts for beneficiaries of CPD programs as easy as 1-2-3. The requested data is simply entered and this calculator will work behind the scenes to generate a summary of results for each beneficiary. Subrecipient's must make sure that the name of the person that entered this information on the summary sheet before it is printed and included as part of the beneficiary's file.

The calculator currently performs income eligibility and assistance amount calculations for the following several HUD CPD programs including ESG: <https://www.hudexchange.info/incomecalculator/>

Homelessness Prevention Income Requirements. The ESG Program interim rule limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30 percent of AMI at intake and incomes that do not exceed 30 percent of AMI at reassessment, which must take place not less than once every 3 months. Income must be calculated at the time of application and every three (3) months thereafter as part of the re-certification process for individuals or families receiving Homelessness Prevention. Income calculations must be documented in the client file.

Rapid Re-Housing Income Requirements. Please keep in mind for program participants receiving ESG "Rapid Re-Housing" assistance, an income assessment is not required at initial evaluation. At re-evaluation - which must take place not less than once annually for rapid re-housing - the participant's household must have an annual income that does not exceed 30 percent of median family income for the area, as determined by HUD.

This section provides detailed information on how to determine the Area Median Income (AMI) and how to calculate household income. Documentation of a household's total annualized gross income relative to Area Median Income and indicating the actual income guidelines for the area (30% of AMI or less) must be documented in the participant file.

Determining Area Median Income:

A household must have a gross annual income that is at or below 30% of the AMI. AMI is determined according to the state and local jurisdiction in which a household resides or enters the program and is dependent on the number of household members. The AMI for each community can be found at <https://www.huduser.gov/portal/datasets/il.html> . Click on the "Data" tab and scroll down to the 5th section labeled "HUD 30% Income Limit for ALL Areas." Agencies should be sure to use the most recent data posted.

When working with ESG program income limits, please be aware of the following key point:

Extremely Low Income vs. Area Median Income Limits. The "Extremely Low Income (ELI) families" limits **DO NOT** apply to the ESG or Continuum of Care (CoC) programs. ESG does not use the ELI measure to establish income limits but instead uses the 30% of Area Median Income (AMI) income limits. Please use the 30 percent AMI tables. If ESG grantees/subrecipients were to use the ELI standard, some applicants for ESG assistance might be falsely determined to be eligible for homelessness prevention assistance, when actually their incomes were over 30 percent AMI.

Under the ESG program, income eligibility is based on the HUD income limits in effect at the time of income verification. Income eligibility is not based on HUD income limits that correspond with the grant year under which the ESG funds were awarded.

Income Definition

Income is any money that goes to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member. Annual income includes the current (within 30 days) gross income of all adult household members (18 years of age or older) and income attributable to a minor (S.S.I., child support, etc.)

The following types of income must be counted (inclusions) when calculating gross income for the household:

- Earned Income
- Payment statement
- Statement of income from employer/source of income
- Self-Employment/Business Income
- Most recent financial statement
- Interest & Dividend Income
- Most recent interest or dividend income statement
- Pension/Retirement Income (VA, SS, and from a former job)
- Most recent benefit notice, pension statement or other payment statement from pension provider
- Armed Forces Income
- Payment statement
- Statement of income from government official/agency
- Unemployment
- Most recent benefit statement
- Disability Income (SSI, SSDI, private disability insurance and VA disability)
- Disability income notice from SSI
- Statement from SSI
- VA Benefit Letter
- TANF/Public Assistance/General Assistance
- Most recent benefit or income notice from public assistance administrator
- Statement from public assistance administrator
- Alimony, Child Support
- Court Order
- All income from full-time students when the head of household or spouse
- Income from full-time students up to \$480 annually when not head of household or spouse
- Adoption Assistance Payments up to \$480 annually
- Worker's Compensation
- No Income Reported
- Self-Certification

The following types of income are NOT counted (exclusions) when calculating gross income for ESG eligibility purposes:

- Income from employment of children, including foster children (Under 18)
- Inheritance and Insurance Income (Lump sum payments)
- Medical Expense Reimbursements
- Income of Live-in Aides
- Disabled Persons
- Student Financial Aid
- Armed Forces Hostile Fire Pay
- Self-Sufficiency Program Income –Funds set aside for use under a PASS program
- Other Income (i.e., temporary, non-recurring or sporadic income)(Gifts)
- Reparations paid by a foreign government
- Income from full-time students- Annual earnings in excess of \$480 for each full-time student (18 or older) (Excluding the head of household or spouse)
- Adoption Assistance Payments- In excess of \$480 annually

- Deferred and Lump Sum Social Security & SSI payments
- Income Tax and Property Tax refunds
- Home Care Assistance
- Other Federal Exclusions- 24 CFR 5.609(c) apply (i.e. food stamps, VISTA, LIEAP, WIA, WIC, Childcare)

NOTE: Household assets are generally not counted as income, with the exception of interest and dividend income as indicated above.

Income Calculation

Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- Hourly Wage multiplied by Hours Worked Per Week multiplied by 52 weeks
- Weekly Wage multiplied by 52 weeks
- Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- Monthly Wage multiplied by 12 months

Income Documentation

HUD's required order

1. Third Party
 - Source
 - Written, including already available documents
 - Oral
2. Intake Staff Observations
3. Self-Certification

Third Party – Written Letters/Referrals

- Official communication (issued on agency stationery or program template)
- Signed and dated by appropriate third party representative
- Additional standards depend on criteria/condition of the Homeless Definition Category being used

Third Party – Recorded Oral Statements

- By intake staff of 3rd party providing verification
- **Must be Signed and dated** by intake staff as true and complete

Oral Third Party—Verification from a third party (e.g. individual employer, Social Security Administration, welfare office, etc.) provided by the third party over the telephone or in-person directly to ESG staff. Oral third-party verification is acceptable only if written third party verification cannot be obtained. ESG staff must document reasons why third party written verification could not be obtained in the ESG case file. The subrecipient may use the 'Verification of Income' form to document oral third-party income verification.

Intake Staff Observations

Applicant Self-Certification—an affidavit of income status as reported by the household is allowable but is only acceptable if written or verbal third-party verification cannot be obtained. ESG staff must document reasons why third party written, or oral verification could not be obtained in the ESG case file. See “ESG Self-Declaration of Income” template at <https://www.hudexchange.info/> for examples. The “ESG Self-Declaration of Income” template is also included under the forms section of this document. At a minimum, self-declaration documentation must include, source, amount, frequency, applicant’s signature, and date.

HUD’s Required Order documentation requirements do not apply when providing:

- Emergency Shelter Assistance (Unsheltered Homeless)
- Street Outreach Assistance
- Domestic Violence Assistance

Note: ESG staff must clearly and briefly describe in case file anytime written third party documentation is not used. This may be done as part of the documented client assessment or as part of other case file documentation (e.g., in case notes, on the income verification form).

Timeliness of Documentation

Documentation that is dated within 30 days prior to the time of application is acceptable for purposes of ESG. However, a statement received any time within the twelve months prior to the time of application and reflecting current benefits received by an applicant household is allowed.

Treatment of Assets

Assets are cash or material items that can be converted to cash quickly. They include real property, personal property, and investments that a household may possess, including assets that are owned by more than one person, but allow unrestricted access to the applicant.

Assets include:

1. Amounts in checking and saving bank accounts.
2. Stocks, bonds, savings certificates, money market funds, and other investment accounts.
3. The cash value of trusts that may be withdrawn by the household.
4. IRA, Keogh and similar retirement savings accounts, even when early withdrawal will result in a penalty.
5. Lump sum receipts of cash received and accessible by household, such as inheritances, capital gains, lottery winnings, insurance settlements, and other claims.

DETERMINING ALLOWABLE RENT

Fair Market Rent and Rent Reasonableness

As explained in the ESG Notice, similar to the rules of other HUD housing programs, the interim rule prohibits rental assistance from being provided for a housing unit, unless the total rent for the unit does not exceed the fair market rent established by HUD, as provided under 24 CFR Part 888 and complies with HUD’s standard of rent reasonableness 24 CFR 982.507. These rent restrictions are intended to make sure that program participants can remain in their housing after their ESG assistance ends.

These rules apply regardless of whether a household is seeking to maintain its current housing (Homelessness Prevention), or if the household is exiting homelessness into new housing (Rapid Re-Housing).

To aid in understanding the rules and implementing them, HUD has released [Rent Reasonableness and Fair Market Rent Under the Emergency Solutions Grants Program](#). It explains the requirements and addresses how to determine whether the unit cost exceeds or does not exceed FMR, how to calculate the gross rent amount, and tips for determining and documenting compliance.

Fair Market Rent (FMR): Units must not exceed the FMR established by HUD for its geographical area. For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, and fees required for occupancy under the lease (other than late fees and pet fees) and if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located. It is not permitted to allow clients to pay the difference if a unit is above FMR.

Rent reasonableness: Rent reasonableness is an ESG requirement when determining if a unit is eligible for ESG assistance. It is determined on a case-by-case basis. Rent reasonableness should be determined by considering the following:

1. The reasonableness in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, management, and maintenance of each unit.
2. The rent should not be in excess of rents currently being charged by the same owner for comparable unassisted units. As the notice states, this comparison can include units advertised for rent as well as those actual rents charged.

Agencies must determine, and document rent reasonableness for all units for which ESG rental assistance is being provided. The requirement applies whether homelessness prevention assistance or rapid re-housing assistance is provided (i.e. when participants are moving into units and when there is a current lease in place).

If the rent for the unit does not meet the rent reasonableness standard, then ESG funds may not be used to assist the household in that unit. Further, ESG funds cannot be used to pay the rent up to the rent reasonable standard, while the tenant pays the remainder. However, an eligible household could receive ESG assistance to relocate to another unit that does comply with rent reasonableness standards and is ultimately more affordable to the household.

In the Notice, HUD set a requirement that rents must be in compliance with the HUD standard of "rent reasonableness." However, it is up to the grantee to determine exactly which documentation it will require in order to ensure that the rent reasonableness standard is met. Agencies may choose to use the "[Rent Reasonableness Checklist and Certification](#)" template.

Exceptions: The rent restrictions discussed in the ESG Interim Rule at 24 CFR 576.106(d) (rent reasonableness and Fair Market Rents) do not apply when ESG funds are being used solely for rental arrears assistance. Furthermore, they **do not apply** when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of "last month's rent," utility payments/deposits, and/or moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal

services, and credit repair. (**Note:** "Last month's rent" may not exceed the rent charged for any other month; security deposits may not exceed 2 months' rent.)

Rental Assistance Agreement

The subrecipient may make rental assistance payments only to an owner with whom the subrecipient has entered into a rental assistance agreement. The agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply. The rental assistance agreement must provide that, during the time of the agreement, the owner must give the subrecipient a copy of any notice to the participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the participant.

It must at least include the following:

- A provision requiring the owner to give the grantee/subrecipient a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant, as indicated in §576.106(e).
- The same payment due date, grace period, and late payment penalty requirements as the program participant's lease, as indicated in §576.106(f).
- For project-based rental assistance, the initial term of the rental assistance agreement must be one (1) year. For tenant-based rental assistance, grantees/subrecipients should establish the term of the rental assistance agreement for the period of time they anticipate providing assistance.

The rental assistance agreement should also include provisions addressing the following:

- **The type of rental assistance being provided** (tenant-based or project-based).
- **Late Payments:** If a grantee/subrecipient incurs late payment penalties, it is the sole responsibility of the grantee/subrecipient to pay those penalties using non-ESG funds, as indicated in §576.106(f).
- **Program Participant Sharing in Rent:** The grantee/subrecipient may require the program participant to pay a portion of the monthly rental cost. In such cases, the grantee (or subrecipient, if applicable) must have written policies and procedures for determining the program participant's portion, and the rental assistance agreement should specify the amount of rent to be paid by the grantee/subrecipient and the amount to be paid by the program participant, as indicated in §576.106(b).
- **Termination:** When providing tenant-based rental assistance, the rental assistance agreement with the owner must terminate and no further rental assistance payments may be made under that agreement if: the program participant moves out of the housing unit; the lease terminates and is not renewed; or the program participant becomes ineligible to receive ESG rental assistance §576.106(h).

Even when the assistance is solely for arrears, a rental assistance agreement is required, because rental arrears are considered rental assistance. For payments of rental arrears, the agreement should provide the amount paid by the grantee/subrecipient, include the number of months of arrears paid, and any other terms and conditions of the payment. The agreement should reflect the evidence/documentation used to justify that the arrears are an eligible payment.

Lease

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit. The lease must be between the owner and the program participant. For participants living in housing with project-based rental assistance, the lease must have an initial term of one year.

Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

Each lease executed on or after December 16, 2016 must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under [24 CFR Part 5](#), subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by [24 CFR 576.409](#), including the prohibited bases for eviction and restrictions on construing lease terms under [24 CFR 5.2005\(b\)](#) and (c). If the housing is not assisted under another "covered housing program," as defined in [24 CFR 5.2003](#), the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

Note on Project-Based Rental Assistance: When providing project-based rental assistance, additional conditions and requirements apply for both leases and rental assistance agreements. See section 576.106(i) of the ESG interim rule for specific requirements.

Per section 576.500(h) of the ESG interim rule, client files/records must include copies of all leases and rental assistance agreements, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

INSPECTIONS

Habitability Standards

Emergency Shelters: All shelters must meet minimum habitability standards. Shelters renovated with ESG funds are required to meet state or local government safety and sanitation standards, include energy-efficient appliances and materials.

Accessibility: Reasonable accommodations for persons with disabilities must be made in order to enable program participants with a disability to have an equal opportunity to participate in the program or activities. If undertaking shelter alterations, you must consult with the specific requirements to be in compliance with 24 CFR Part 8.

Housing Standards: If ESG funds are used to help a program participant remain in or move into permanent housing that housing must meet habitability standards. Inspections must be conducted upon initial occupancy and signed by the subrecipients.

An on-site inspection is required anytime a program participant is receiving ESG financial assistance. (Financial assistance includes arrears, rental assistance, security deposit assistance, utility assistance, etc.). Habitability inspections are not required for persons receiving services only (anything other than financial assistance).

Following are the habitability standards that grantees must follow:

- The unit must be in compliance with all applicable state and local housing codes and licensing requirements.
- Structure and materials: must be structurally sound so as not to pose any health and safety threat to occupants and to protect occupants from the elements.
- Access: must be accessible to occupants without being accessible to unauthorized persons, and must provide an alternate means of egress in case of fire.
- Space and security: must afford adequate space and security for occupants and belongings including an acceptable place to sleep.
- Interior air quality: each room or space must be provided with natural or mechanical ventilation and must be free of air pollutants at levels that threaten the health of the occupants.
- Water supply: must be free from contamination.
- Sanitary facilities: Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
- Thermal environment: must have adequate heating and or cooling facilities in proper working condition.
- Illumination and electricity must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of occupants. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
- Food preparation and refuse disposal: all food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
- Sanitary condition: housing and any equipment must be maintained in a sanitary condition.
- Fire safety
 - Each dwelling must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing-impaired persons, smoke detectors must have an alarm system designed for the hearing-impaired in each bedroom occupied by a hearing-impaired person.
 - Public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwell, and common areas.
 - There must also be a second means of exiting the building in the event of fire or other emergency.

The Housing Quality Standards (HQS) used for other HUD programs are more stringent than the habitability standards outlined in the ESG Notice. Agencies are not required to use HQS but may do so if they choose.

Habitability standards do *not* require a certified inspector to conduct on-site inspections.

Inspections must be conducted upon initial occupancy and then on an annual basis for the term of ESG assistance.

Agencies should use the “ESG Habitability Standards Checklist” as a guide to conduct the on-site inspection. This checklist can be found at <https://www.hudexchange.info/resource/3766/esg-minimum-habitability-standards-for-emergency-shelters-and-permanent-housing/> and should be completed upon initial occupancy and on an annual basis for the term of ESG assistance. Copies of the completed checklists should be included in the case files for documentation purposes.

Lead-based Paint Requirements

The lead-based paint requirements exist to protect vulnerable families from potential health hazards. To prevent lead-poisoning in young children, agencies must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35, Parts A, B, H, J, K, M, and R. As agencies that provide assistance to and advocate on behalf of disadvantaged populations, it is important to understand that the lead rule is a tool that helps you ensure the safety and well-being of your clients.

Under ESG, the rule is that a lead-based paint visual assessment **must be completed** for all units that meet the three following conditions:

1. The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears).
2. The unit was constructed prior to 1978.
3. A child under the age of six is or will be living in the unit or a pregnant woman will live there.

Note: Emergency Shelters receiving funds must meet the Lead-Based Paint requirements as a condition of funding.

The lead requirements apply regardless of whether a household is remaining in an existing unit or moving to a new unit. The visual assessment must be completed prior to ESG assistance being provided, and annually thereafter.

There are certain exceptions to the rule. Visual assessments by ESG staff are not required under the following circumstances:

- o It is a zero-bedroom or Single Room Occupancy (SRO) sized unit (studio apartments, dormitories, etc.);
- o X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- o The property has had all lead-based paint identified and removed in accordance with HUD regulations;
- o The client is receiving Federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months – e.g., if the client has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears (note, in such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted from the agency administering the other form of assistance for the ESG case file); or
- o It meets any of the other exemptions described in 24 CFR Part 35.115(a).

If any of the conditions outlined above are met, ESG program staff simply need to document the condition by completing the *ESG Lead Screening Worksheet* and placing a copy in the case file. (Note: While grantees are required to document compliance with the lead rule, they are not required to use this particular screening worksheet. This tool was developed as a sample to assist agencies who may be looking for resources to use in their local programs.) Remember, regardless of these exceptions, all properties are still subject to the disclosure requirements.

Disclosure requirements: Disclosure requirements are triggered for **ALL** properties constructed prior to 1978. These require that **property owners or managers** provide tenants with:

- US EPA's "Disclosure of Information on Lead-Based Paint and/or Lead-Based Paint Hazards" for rental properties disclosing the presence of known and unknown lead-based paint and is available at https://www.epa.gov/sites/production/files/documents/lesr_eng.pdf; *AND*
- A copy of the "The Lead-Safe Certified Guide to Renovate Right" which includes important lead hazard information for families, child care providers and schools brochure. The brochure is available at: <https://www.epa.gov/sites/production/files/documents/renovaterightbrochure.pdf>. As explained, this requirement actually relates to property owners/managers, but sharing this information with your clients (or ensuring they have received it) is an easy thing to do and will make your job easier. ESG assessments are an important opportunity to educate clients about the potential hazards related to lead and their rights as tenants. Informed tenants are more likely to watch for potential problems in their home and proactively work with landlords to address any issues.

Program staff should consider sharing available on the US EPA website with property owners, managers, landlords, and renters to outline responsibilities and provide additional guidance:

- EPA and HUD Move to Protect Children from Lead-Based Paint Poisoning; Disclosure of Lead-Based Paint Hazards in Housing: <https://www.epa.gov/sites/production/files/documents/fs-discl.pdf>
- Real Estate Disclosures about Potential Lead Hazards <https://www.epa.gov/lead/real-estate-disclosures-about-potential-lead-hazards>

Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit.

ESG Program Staff Responsibilities

1. Determine whether lead-based paint requirements are triggered
2. Inform ESG client and property owner of the lead-based paint requirements and schedule visual assessment.
3. Conduct visual assessment
4. Identify risks and compare to "de minimis" level
5. Make assistance determination.
6. Confirm all identified deteriorated paint has been stabilized.
7. Respond to a child with elevated blood leads levels.
8. Conduct ongoing lead-based paint monitoring. (Annually)

ESG program staff is responsible for ensuring that property owners/managers understand their responsibilities with regard to lead-based paint hazards.

Property Owner/Manager Responsibilities

1. Distribution of pamphlets and disclosure notice to occupants.
2. Perform paint stabilization.
3. Use safe work practices.
4. Obtain clearance.
5. Provide Notice of Lead Hazard Reduction to tenants.
6. Conduct ongoing lead-based paint maintenance.

Anyone may become a HUD-Certified Visual Assessor by successfully completing a 20-minute online

training on HUD's website at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm> . The training teaches individuals how to identify deteriorated paint and how deteriorated paint must be treated.

Environmental Review

ESG activities are subject to environmental review under HUD's environmental regulations in 24 CFR Part 58. HUD has authorized states and units of general local government to assume HUD's responsibilities for environmental review. The same environmental reviews procedures remain that have been required for all Emergency Shelter Grants program grants. The environmental effects of each application must be assessed in accordance with the provisions of the National Environmental Policy Act of 1969 (NEPA) and the related authorities listed in HUD's implementing regulations at 24 CFR Parts 50 and 58.

Environmental regulations provide certain categorical exclusions under NEPA and under Part 58 set conditions under which excluded activities may be determined exempt from all environmental review requirements. In cases where proposed assistance and matching contributions solely involve operating costs for facilities or the provision of essential services, and the structures and sites involved in the project meet the program requirements of this part, these activities are categorically excluded by regulation and may be determined fully exempt from environmental review.

Funds may not be obligated or expended for activities in projects that have not been previously environmentally cleared. ESG funds distributed by the State to units of local government, will require that unit of local government to assume the environmental responsibility specified in Section 104 (g)(1) of the Housing and Community Development Act of 1974. The State will be responsible for providing the release of funds in accordance with the requirement of 24 CFR Part 58.

Funds distributed by the State to nonprofit organizations will require the State to assume the environmental responsibilities specified in Section 104 (g)(1) of the Housing and Community Development Act of 1974, as amended in 1992. The State will provide the release of funds in this instance. In either case, funds may be obligated or expended only after the Request for Release of Funds and Certification of Compliance with Environmental Regulations at 24 CFR Part 58 have been approved for projects provided that fifteen (15) calendar days have elapsed from the time of receipt of the Request for Release of Funds and the Certification and if no objections from the public are received. An Environmental Determination Guide for ESG Activities may be found in Section 9.5 of this manual.

CASE MANAGEMENT

Assistance through the Emergency Solutions Grants (ESG) program is intended to be provided as a part of a system-wide approach. In order to evaluate and coordinate services to the greatest extent possible, ESG grantees and subrecipients providing ESG-funded rental assistance or housing and relocation services under the Rapid Re-Housing and/or Homelessness Prevention components must:

- Develop a plan with each program participant on how they will retain permanent housing after the ESG assistance ends (see 24 CFR 576.401(c)(1)(ii)).
- Require program participants to meet with a case manager not less than once per month while they are receiving ESG-assistance to implement the plan and monitor progress towards housing stability (see § 576.401(c)(1)(i)).
- Assist program participants in obtaining appropriate supportive services, as well as connecting them to other federal, state, local, and private benefits and services for which they may be eligible. This includes, but is not limited to, Medicaid, SNAP, WIC, unemployment insurance, SSI/SSDI, services for veterans, and TANF (see § 576.401(d)).

- Have written policies and procedures for coordination among different providers of services in the community. Activities must be coordinated and integrated to the maximum extent practicable (see § 576.400(e)(3)(v)).

The approach to case management described above is required when providing any amount of Rapid Re-Housing or Homelessness Prevention assistance, even when just a one-time payment of rent/utility arrears is being provided. In this instance, a single case management session may meet the program's requirements so long as the housing plan can be established and the referrals to mainstream resources can be completed during the initial intake meeting. The grantee or subrecipient may require the program participant to attend additional follow-up meetings as a condition of receiving assistance.

Housing and Services/Stabilization Plan

Housing and services plan should be completed for all participants that receive an initial intake evaluation, if necessary. The plan is intended to be a guide for both the participant and the subrecipients. It should focus on obtaining or maintaining housing with defined goals, outcomes and timelines. The plan should also identify needed community resources, referrals to partnering agencies especially for mainstream benefits, budget education and tenant education.

Obtaining or maintaining stable housing is a likely primary goal and other steps needed to achieve housing stability (such as employment or needed supports) are likely related goals. Plans must be developed with full involvement from household members and should start with a strength's assessment. Case managers should build plans around the client's own goals. Service needs may include: mental health, substance abuse, domestic violence, education, employment, and health care. The plan should assist the program participant in retaining permanent housing after the ESG assistance ends.

Participants must be assisted, as needed, in obtaining appropriate supportive services such as medical or mental health treatment or services essential for independent living including mainstream benefits (Medicaid, SSI, SSDI, SNAP, WIC, LIEAP etc.)

In addition to assessing and documenting income and the current housing situation of applicant households, the agencies must also assess and document that the household would become homeless **but for** the ESG assistance. This includes assessing and documenting a household's support networks, monthly budget of expenses, financial resources and other housing options.

Providing ESG Case Management Services without Rental or Financial Assistance

Under the Rapid Re-Housing and Homelessness Prevention components, ESG funds can be used for case management services (or other services) alone. That is, although rental assistance cannot be provided independent of case management services, case management can be provided independent of rental assistance. For example, services (such as case management) could be provided after the term of a program participant's rental assistance expires, as long as the 24-month cap for each type of assistance is not exceeded.

ESG "stand alone" case management or other services can also be provided to support program participants who receive rental assistance through non-ESG programs, as long as the individual or family is eligible for ESG assistance at the time of the intake evaluation and any recertification(s) of eligibility.

Limitation on Housing Stability Case Management Under the Rapid Re-Housing Component

Often, households that are eligible for Rapid Re-Housing assistance reside in an emergency shelter or in a place not meant for human habitation while they wait for a unit to be identified. The following principles for charging the costs of housing stability case management under Rapid Re-Housing apply in these situations:

- Grantees/subrecipients may provide housing stability case management assistance under the Rapid Re-Housing component for up to 30 days during the period these program participants are residing on the street or in an emergency shelter and seeking permanent housing (see § 576.105(b)(2)).
- If the program participant needs more than 30 days of housing stability case management assistance while they are sleeping in an emergency shelter or on the street (or other place not meant for human habitation), it must be charged either to Emergency Shelter: essential

services or Street Outreach: case management, as appropriate. The costs are then subject to the cap on these components.

- Once the program participant is in permanent housing, housing stability case management can be provided under the Rapid Re-Housing component for up to 24 additional months.

REASSESSMENT OF ELIGIBILITY

Requirements

Agencies must evaluate and reassess the eligibility of ESG program participants not less than once every 3 months for Homelessness Prevention and not less than once every one (1) year for Rapid Rehousing. Agencies should determine the reassessment date based on the original eligibility assessment date. The intent is to assure the household remains eligible and needs continued assistance to prevent homelessness, particularly since eligibility is based on current income as opposed to past or projected income.

At the subrecipient's discretion, re-evaluations may be conducted more frequently than required by 24 CFR 576.401 and may also be incorporated into the case management process which must occur not less than monthly for homeless prevention and rapid re-housing participants – See 24 CFR 576.401(e) (i).

At a minimum, the re-evaluation of eligibility must establish that:

- The household does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD.
- The program participant lacks sufficient resources and support networks necessary to retain housing with ESG assistance.
- The subrecipients may require each program participant receiving assistance to notify the subrecipients regarding changes in the participant's income or other circumstances that affect the participant's need for assistance under ESG.

Changes in household composition or participant's income

The limits on the assistance apply to the total assistance an individual receives, either as an individual or as part of a family. (§ 576.106)

The subrecipient may require each program participant receiving homelessness prevention or rapid rehousing assistance to notify the subrecipient regarding changes in the program participant's income or other circumstances (e.g., changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the subrecipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs. (§ 576.401). To preserve local discretion, it is the subrecipient's choice whether to use household composition or income change other than the required re-evaluation periods of three months for homeless prevention and annually for rapid re-housing. If so, it must be documented in the written policy and procedures manual.

ADMIN REVIEW – DENIAL OR TERMINATION AND GRIEVANCE

ESG Administrative Review

The purpose of the Administrative Review is to provide for the resolution of a program issue by a higher administrative authority. The Administrative Review provides the program participant an opportunity to present written or oral objections about why the proposed action is incorrect before a person other than the person (or a subordinate of that person) who made or approved the denial or termination decision.

Any aggrieved person may file a written appeal with the subrecipient in any case in which the person believes that the subrecipient has failed to properly consider the person's application for assistance under this part. Such assistance may include, but is not limited to, the person's eligibility for, or the amount of, a payment, or termination from the program.

In deciding an appeal, the subrecipient and/or Department shall consider all pertinent justification and other material submitted by the person, and all other available information that is needed to ensure a fair and full review of the appeal.

Subrecipient Administrative Review Process

1. If the program participant disagrees with the action taken on their case, then they have fifteen (15) days from the date of notice to request an Administrative Review and complete the Administrative Review Request Form.
2. Upon receipt of the written request for an Administrative Review, the subrecipient will notify the program participant in writing of the scheduled date, time and place, for the review within ten (10) days of the receipt of the request. If the program participant cannot appear at the date and time set for the review meeting, the program participant shall be given a reasonable opportunity to reschedule the review meeting.
3. If the program participant fails to cooperate reasonably in scheduling and completing the review meeting, the review will be cancelled, and the meeting will not be rescheduled.
4. At the Administrative Review, the program participant will be able to present their reasons for requesting the review and will be encouraged to bring any documentation or witnesses to support their argument. The subrecipient will explain the reasons for their decision.
5. After the program participant has presented their argument, the subrecipient will make a determination of any steps to be taken to resolve the issue.
6. The subrecipient will communicate its determination including an explanation of the basis on which the decision was made in writing to the client within one week.
7. The subrecipient will prepare a written report of the review for CDD within one week.

Review Outline

Responsibility	Outline
Sub-grantee	<ol style="list-style-type: none"> 1. Open the Administrative Review by: <ol style="list-style-type: none"> a. Stating its purpose and scope; and 2. Ask the claimant or his/her representative to present their side of case.
Participant or Representative	<ol style="list-style-type: none"> 1. Explain why the Administrative Review was requested. 2. Present information in support of said position.
Sub-grantee	<ol style="list-style-type: none"> 3. Present the sub-grantee's side of the case. <ol style="list-style-type: none"> a. Explain the basis for the sub-grantee's action. b. Present documentation in support of said action. 4. Resolve differences by:

	<ol style="list-style-type: none"> a. Interpreting state policies and regulations which may not be entirely understood. b. Explaining to the claimant the laws and regulations under which the Department operates. <ol style="list-style-type: none"> 5. After both sides have presented their side, close the review meeting. 6. Report the outcome to the program participant and CDD
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The program participant may withdraw their request for Administrative Review by sending a written and signed letter to the subrecipient.

Reversed or Modified Decision: At any time during the Administrative Review, an action may be reversed or modified by the subrecipient based on program policy.

If the Administrative Review does not resolve questions and issues relating to the adverse action to the program participant's satisfaction, the program participant may request a second review by the Department.

Department Administrative Review Process

1. If the program participant disagrees with the action taken on their case by the subrecipient, then they have fifteen (15) days from the date of notice to request an Administrative Review by the Department.
2. The program participant must send the Department a copy of the original Administrative Review Form and provide an update on adverse actions.
3. Upon receipt of the written request for an Administrative Review, the Department will notify the program participant in writing of the scheduled date, time and place, for the review within ten (10) days of the receipt of the request. If the program participant cannot appear at the date and time set for the review meeting, the program participant shall be given a reasonable opportunity to reschedule the review meeting.
4. If the program participant fails to cooperate reasonably in scheduling and completing the review meeting, the review will be cancelled, and the meeting will not be rescheduled.
5. The subrecipient must give the Department all relevant documents pertaining to the case and subrecipient Review upon request.
6. At the Department Administrative Review, the program participant will be able to present their reasons for requesting the review and will be encouraged to bring any documentation or witnesses to support their argument.
7. The Department will review the relevant facts, circumstances and regulations involved in the adverse action.
8. After the program review is complete, the Department will make a determination of any steps to be taken to resolve the issue.
9. The Department will communicate its findings in writing to the client and subrecipient within one week of the review meeting.
10. A review decision by the Department is final.

The Department Review will follow a similar outline to the subrecipient review.

Right to representation: A person has a right to be represented in their review. They may be represented by legal counsel, or by a relative, friend, or other spokesperson, or they may represent themselves. However, such representatives must have written authorization from the claimant to act in such a capacity and solely at the person's own expense.

Review of files by person making appeal: The subrecipient shall permit a person to inspect and copy all materials pertinent to their review, except materials which are classified as confidential by the subrecipient. If a copy is requested, there is a fee of 10 cents per page.

CLIENT FILE CHECKLIST AND REQUIREMENTS

Regardless of the type of assistance provided, if the assistance was a direct service payment or a service was provided, there must be a client file that details the reason for the assistance and justifies eligibility. It is also required to keep a record of all clients that are screened and classified as ineligible. The ESG recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.

In order to ensure that information contained within the file is complete and accurate, refer to the **Client File Documentation / Record Keeping Requirements by Category** and use the **Client File Checklist** form located in the forms section of the Appendix.

Section 4: PROGRAM FISCAL ACCOUNTABILITY

Financial Responsibilities

Programs will maintain an accounting system which segregates each major ESG funding category. (Emergency Shelter/Rapid Re-Housing/Homeless Prevention) Please note the following:

- Program must not make payments directly to program participants but only to third parties such as landlords and utility companies.
- Property receiving ESG financial or rental assistance funds may not be owned by the subrecipients or the parent, subsidiary or affiliated organization of the subrecipients.
- Rental assistance paid by program cannot exceed the actual rent costs.
- Programs may not charge program fees to participants.

Financial Standards

Internal controls reflect the overall financial management of an organization. Standards for financial management systems of nonprofit organizations may be found in 24 CFR 84. The following areas should be included:

Budget Controls: When budget controls are adequate, the subrecipients will have a regular, on-going basis of comparison between actual expenditures and ESG-budgeted amounts for the activities. The ESG budget will cover intended activity expenses with flexibility for adjustments during the grant period. The subrecipient will also relate its financial information to recorded outcomes.

Accounting Controls: Expenditures must be supported by invoices, contracts, purchase orders, etc.,

Wages: Wages supported by more than one funding source must be documented by records that clearly show the time distribution and wage breakdowns between programs.

Financial records: Financial records that are relative to the ESG must be maintained for eight (8) years.

Procurement Rules: 24 CFR Part 84 provides regulations that govern the procurement of supplies, equipment, construction and services to ensure that they are obtained economically and competitively. In summary, subrecipients may use their own procurement procedures as long as they conform to the regulations. Important elements for subrecipients to consider are: a system to handle contract disputes; a code of conduct preventing conflicts of interest; some form of cost analysis to ensure economic purchases; positive efforts to use small, minority- and woman-owned businesses to the maximum extent possible.

Property Controls: The Federal regulations regarding property controls in 24 CFR 84.34 (f) are for the purpose of tracking the assets purchased with grant funds to ensure that they are properly maintained, secure and being used for authorized purposes. Agencies using ESG funds to purchase furnishings, vehicles or equipment for an activity should keep accurate records including the following: a complete description of the item purchased a serial or other identification number, the source of funds and Grant Agreement number, the acquisition date and the cost.

Audit Requirements

The subrecipient shall conform to the Uniform Administrative Requirements, Cost Principles, and Audit Requirements of Federal Awards (Uniform Requirements) of 2 CFR 200.302, Financial Management, 2 CFR Part 200, Subpart F, Audit Requirements and 2 CFR 200.303, Internal Controls.

Recordkeeping

Sufficient records must be established and maintained to enable CDD and HUD to determine whether ESG requirements are being met. The subrecipient must make sure any Subrecipients assisting subrecipient with the ESG program also maintain appropriate and complete records.

Subrecipients shall retain all program records pertinent to client services and expenditures paid with ESG funds. It is also required to keep a record of all clients that are screened and classified as ineligible. The ESG recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination. Currently, program records including client files must be retained for a period of eight (8) years after the Master Contract ends. If any litigation, review, claim or audit is started before the expiration of the eight (8) year period, the record must be retained until all litigation, reviews, claims or audit findings involving the records have been resolved. They should be retained for 10 years when renovation of an emergency shelter exceeded 75% of the value of the building before renovation; and 10 years when conversion of a building into an emergency shelter exceeded 75% of the value of the building before renovation Refer to the Appendix for Client File Documentation / Record Keeping Requirements by Category.

If client file documents and signatures or policy documents are collected and maintained electronically, required documentation must be made available to CDD in paper form when requested or vice versa.

Procurement

Purchases of services from contractors or vendors by nonprofit subrecipients with ESG funds are subject to 24 CFR Part 84. This includes standards that prohibit conflicts of interest, procedures for open competition with consistent technical solicitations, affirmative efforts to hire minority- and women- and veteran owned businesses, maintenance of selection documentation, and a contract administration system that provides sufficient monitoring. Purchases of services from contractors or vendors by public agencies with ESG funds are subject to 24 CFR Part 85.

Late Payments

The subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Landlord W9

Subrecipients are required to collect the W9 for each landlord and property management institution. For more information or to get a copy of the form, please refer to the [IRS](#).

Funds Reallocation and Recapture

Per the contract, CDD will review financial reports and budget allocations for the eligible program components and will re-allocate resources if necessary.

CDD may, to meet production and expenditure goals, reduce the total funds of this contract for reallocation to an eligible contractor requiring additional funds in accordance with the following formulas:

1. If the Contractor has expended less than 45% of the total contract funds at 50% of the contract period, the Department may reduce the total contract funds by the difference between the 45% and the actual expenditures.
2. If the Contractor has expended less than 70% of the total contract funds at 75% of the contract period, the Department may reduce the total contract funds by the difference between the 70% and the actual expenditures.

REPORTING

Reporting guidelines

The City of Gary Community Development Department is required to use the following four systems to input data related to the Homeless Prevention and Rapid Re-Housing Program. Each system is listed below as is the requirements that the state has imposed on the Human Resource Councils.

1. HUD's Integrated Disbursement and Information System (IDIS) is the financial management system through which the Department must draw down funds. The Department will not be entering any performance or beneficiary data into IDIS.
 - Agencies must submit a work plan on how their money will be allocated. These amounts are inputted into IDIS. The subrecipient must track their expenditures and ensure they are not overspending in any one budget category. If more authority is needed in any one budget category a revised work plan is required before the invoice will be paid.
2. A Homeless Management Information System (HMIS) is a client-level data collection and management system that allows for better coordination among agencies providing services to clients. It is not a national reporting system and it is not designed to be a financial reporting/accounting system. Agencies providing ESG assistance **MUST** enter client-level data into HMIS so the subrecipient can insert aggregate data into the SAGE system by a link which is sent by CDD which is then reported into HUD through the CAPER.

Subrecipient Invoices

Once the subrecipient signs the ESG contract, the subrecipient is provided with the ESG Monthly Progress Report form, the ESG Matching Funds Verification Form, and the ESG Reimbursement Request Form which will allow them to request reimbursement of funds. Once the contract has been approved by the Board of Public Works, a copy of the approved contract will be sent to the subrecipient which can then begin to expend funds.

Agencies are required to submit the ESG Reimbursement Request Form, along with copies of receipts/invoices of allowable expenditures, and the Monthly Progress Report form on a monthly basis to CDD by the 10th of every month. The forms can be faxed, mailed or emailed with a signature. Email is preferred.

Included with the invoice are the following (Items may change as needs for the report change):

- Invoice
- Contract Summary
- Invoice Details
- Number Served
- FTE Table (for informational purposes)

An explanation of the Provider Invoice is as follows:

- Line 1 is equal to the contract amount of the contract. No reimbursement over the contract amount is allowed.
- Line 2 is the amount of cash that it has received to date. This will include both the outstanding advance and expenditure amounts that have been requested.
- Line 3 is the amount of cash that the HRDC has available to request.
- Line 4 is the amount of expenditures that have been asked for on the contract.
- Line 5 is equal to the amount that the HRDC is currently requesting for the specific time period.
- Line 5a is the amount of the current expenditures that will be expended towards the outstanding advance. The amount in 5a should not be greater than the amount in line 5. For example, if there is an outstanding advance of \$100,000, but only \$80,000 in expenditures then only put the \$80,000 in Line 5a.
- Line 5b is the amount in line 5 minus the amount if any in line 5a.
- Line 6 is the total YTD expenditures, which will be line 4 plus line 5.
- Line 7 is the Cash Balance that is available which may be positive or negative depending on the amount of advance that is still outstanding. This amount is figured by taking line 2 and subtracting line 6.
- Line 8 is the amount of new advance that is being requested. This is the amount of upfront cash that you need to operate for the month. This amount will not be greater than the Current Contract Balance.
- Line 9 is the total payment amount which is equal to line 5b plus line 8.
- Line 10 is the new Contract Balance, line 3 minus line 9.
- In the Provider/Contractor Approval box is where an authorized person from the subrecipient will sign to receive payment.

When the subrecipient wishes to submit an invoice for payment they will fill out the Provider invoice and a supplemental program payment certification sheet that details the payment line items to be drawn down through IDIS. Payments will not be processed without a signed Provider invoice and the supplemental draw sheet. Both sheets must have an appropriate person signature approval. The subrecipient then submits the invoice.

Once all ten invoices are received, the **Community Services Program Officer** matches them to their respective work plan. If all looks good, they then send it to the Contract Specialist who inputs the invoice into the subrecipient contract system AWACs. The invoice is then given to the department's financial officer to authorize.

After all invoices are authorized, the program officer compiles the invoices and supplemental draw sheets for the payment month onto one draw sheet to be submitted to the General Ledger for drawdown through IDIS.

Once the invoice is authorized in AWACs, the payment will process and be sent out to the subrecipient either by direct deposit or check in the mail. A new Provider Invoice will be emailed to the subrecipient with the new balances remaining on the contract.

It is the subrecipient's responsibility to monitor available funding and make requests for amendments to work plans prior to exceeding available balances.

Please refer to the subrecipient Contract for further guidance. If there are ever any questions on the process of payments or any other questions, please contact the Fiscal Officer.

Integrated Disbursement and Information System (IDIS)

HUD's IDIS is the financial management system through which the Department must draw down funds and reports on ESG performance data for HUD's Consolidated Annual Performance and Evaluation Report (CAPER).

Agencies must submit a work plan with their ESG Contract on how their money will be allocated. These amounts are inputted into IDIS. The subrecipient must track their expenditures and ensure they are not overspending in any one budget category. This coincides with the payment certification that is attached to a subrecipient's monthly invoice. If more authority is needed in any one budget category a revised work plan is required before the invoice will be paid.

Homeless Management Information System (HMIS)

HMIS is a client-level data collection and management system that allows for better coordination among agencies providing services to clients. It is not a national reporting system and it is not designed to be a financial reporting/accounting system.

Section 416 (F) of the McKinney-Vento Act requires that projects receiving funding under Emergency Solutions Grant program participate in HMIS. With the exception of victim service or legal service providers, all ESG subrecipients MUST enter client-level data into the HMIS in accordance to the U.S. Department of Housing and Urban Development HMIS Data Standards. Victim service providers will use a comparable database that collects client-level data over time and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to a HMIS system.

All data for a quarter must be entered by the 5th day following the end of the quarter in order to meet reconciliation and reporting requirements.

The City of Gary Community Development Department's Compliance Manager will review the HMIS data on a quarterly basis using the APR-CAPER Review Tool to ensure that the data its being entered correctly in a timely and accurate manner. The Compliance Manager will contact any organization that is not complying with entering HMIS data to resolve any issues. If issues are not resolved, he Compliance Manager will then contact the HMIS help desk at IHCDA.

Please refer to the HMIS Data Standards for a discussion of the current data standards for collecting and entering information for clients. This is available in the HMIS Help option as well as through [HMIS Data Standards - HUD Exchange](#) and [HMIS Data Collection Requirements for Transition to FY2024 HMIS Data Standards \(hudexchange.info\)](#)

For HMIS Training opportunities, contact the IHCDA at HMISHelpDesk@ihcda.in.gov

Reconciliation Requirement

Reconciliation between the HMIS housing assistance information and the amounts invoiced to CDD must be made on a quarterly basis. A quarterly report of HMIS data will be provided and the subrecipient must provide written verification that the information in HMIS is complete and accurate.

RECORDKEEPING

The City of Gary Community Development Department and subrecipients will maintain records to verify compliance with all policies, procedures and regulations in addition to the following specific requirements for recordkeeping.

Records Retention

All ESG records must be retained for 8 years after the Master Contract ends. While ESG policy includes a minimum of 5 years as required by 24 CFR 576.500(y), Grantee contracts supersede this requirement.

Access to all books, documents, papers, or other records of the State and its subrecipients pertinent to ESG will be given to the HUD Office of the Inspector General, the Comptroller General of the United States, or any of their authorized representatives upon request for as long as they are retained.

Client Confidentiality

Confidentiality of all records is required. All records containing personally identifying information of any applicant for and/or recipient of ESG assistance will be kept secure and confidential.

Each subrecipient must have written procedures to ensure:

1. The security and confidentiality of records containing any personally identifying information of any individual or family who applies for and/or receives assistance; and
2. That the address or location of any assisted individual, family or housing situation will not be made public, except to the extent that this prohibition contradicts a pre-existing privacy policy of the subrecipient.

Information regarding participants will be released only after appropriate authorization to release and/or obtain information is completed.

Access to client records should always be restricted to the employee or agent that must have access to the client's information in order to properly perform their normal job functions.

Written policies should inform clients about their rights to confidentiality and disclose that all information contained in their file is confidential. Employees or program funders with access to information about the client are bound by confidentiality guidelines and will not disclose this information without prior written consent.

Upon written request, ESG clients should have access to review their records and case file content. A private location should be provided to the client for this purpose within the subrecipient. Clients should not be allowed to remove their case file from the subrecipient; however, they may be granted copies of file contents upon request. Sponsors may charge a reasonable fee for copies.

Section 5: OTHER FEDERAL REQUIREMENTS

MATCH

Each subrecipient of ESG funds will provide match equal to the amount of HUD funds received by the City of Gary Community Development Department. Matching is required to be reported annually. Agencies must use the *City of Gary's CDD Emergency Solutions Grant Matching Funds Verification Form Match Report Form* which is attached to the contract. Limited match waivers are approved on a case-by-case basis to subrecipients with limited financial opportunities.

Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local, and private sources.

Federal Sources used as contributions:

1. The grantee must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match ESG funds.
2. If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the matching requirement.
3. Contributions that have been or will be counted as satisfying a matching requirement of another Federal grant or award may not count as satisfying the matching requirement.
4. The matching funds must be provided during a specified contract period. Eligible types of matching contributions:
 - Cash contributions which are expended for allowable costs
 - Noncash contributions – The value of any real property, equipment, goods, or services contributed to the ESG program provided that if they were paid for with grant funds that they would have been allowable
 - The value of any donated material or building,
 - The value of any lease on a building,
 - Any salary paid to staff to carry out the program of the grantee, and the value of the time and services contributed by volunteers to carry out the program.
 - Program Income is to be used as a match Calculating the amount of noncash contributions:
 - Must use a method reasonably calculated to establish the fair market value.
 - Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the organization or consistent with other employers for similar work in the same labor market.
 - Costs paid by program income can count provided the costs are eligible ESG costs that supplement the ESG program.

Please Reference § 576.201 Matching requirement for further information.

FAITH-BASED ACTIVITIES

Minimum standards for faith-based activities (24 CFR 576.406) Religious/faith-based organizations

- Are eligible on same basis as other organizations
- Retain their independence
- Must not engage in inherently religious activities as part of ESG-funded activities

- Must not discriminate based on religion or religious belief
- Must not use ESG funds to rehabilitate structures used for inherently religious activities (e.g., chapels or sanctuaries)

If local government contributes its own funds to a faith-based organization to supplement federal funds

- Funds may be segregated or commingled
- If commingled, restrictions apply

CONFLICT OF INTEREST

Subrecipients must keep records to show compliance with HUD's organizational conflicts-of-interest requirements.

Conflict of Interest (Organization/Agency Level): ESG assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent. No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401.

If ESG program participants are to be assisted in a property that is owned by the subrecipient or affiliated organization of the subrecipient, the grantee must submit a letter to the CPD Director requesting a waiver for good cause.

The waiver must:

1. Include a description of the benefit(s) to ESG participants;
2. Explain how the subrecipient disclosed the conflict and addresses/mitigates any potential issues;
3. Demonstrate that the subrecipient has looked for other appropriate housing and it is not available, or there is a good reason why the subrecipient housing is better for the clients;
4. Demonstrate that the subsidy is not tied to a unit (clients must be able to choose the subrecipient housing);
5. Demonstrate that an attorney has reviewed the housing selections and determined that the activities proposed do not violate state and local law; and
6. Demonstrate that there is no implied benefit to any individual or organization.

Conflict of Interest (Individual Level): When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 2 CFR 200.112.

The ESG Notice states: "No person who is an employee, agent, consultant, officer, or elected or appointed official of the grantee and who exercises or has exercised any functions or responsibilities with respect to assisted activities, or who is in a position to participate in a decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds there under, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter." (emphasis added)

NOTE: Employees of an subrecipient and their families are not automatically disqualified from receiving ESG assistance, as long as they meet the qualifications of the above paragraph (i.e., they are not in a position to exercise any responsibilities, make decisions about, gain inside information into, or obtain a personal

benefit from ESG). This situation would be more likely in a large agency than it would in a very small agency.

When a conflict of interest exists, the grantee may seek an exception by writing to the local HUD Field Office, including the following information:

- For states and other governmental entities, a disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and
- For all grantees, an opinion of the grantee's attorney that the interest for which the exception is sought would not violate state or local law.

All Transactions/Activities: No persons involved with the ESG program or who is in a position to participate in a decision-making process or gain inside information regarding the program activities, shall obtain a financial interest or benefit from an assisted activity; or have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds during his or her tenure or for one year following tenure. These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider's agency.

If there is a question or the appearance of a conflict of interest of any type, the subrecipient should contact the local HUD field office to determine if an exception or waiver is needed.

NONDISCRIMINATION AND EQUAL OPPORTUNITY REQUIREMENTS

Regulatory Requirements

Agencies must comply with all applicable fair housing and civil rights requirements in 24 CFR 5.105(a).

Agencies must make known that ESG rental assistance and services are available to all on a nondiscriminatory basis and ensure that all citizens have equal access to information about ESG and equal access to the financial assistance and services provided under this program.

Each subrecipient must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964. This may mean providing language assistance or ensuring that program information is available in the appropriate languages for the geographic area served by the jurisdiction and that limited English proficient persons have meaningful access to ESG assistance.

To assist the agencies, HUD published the "Final Guidance to Federal Financial Assistance Recipients Regarding Title VI Prohibition Against National Origin Discrimination Affecting Limited English Proficient Persons" (72 42 Federal Register 2732; January 22, 2007). This document can be accessed at the following website: [http://www.nhlp.org/files/Limited%20English%20Proficiency%20Outline%20%20\(2-6.17.09\).pdf](http://www.nhlp.org/files/Limited%20English%20Proficiency%20Outline%20%20(2-6.17.09).pdf).

In addition, all notices and communications shall be provided in a manner that is effective for persons with hearing, visual, and other communication-related disabilities consistent with section 504 of the Rehabilitation Act of 1973 and implementing regulations at 24 CFR 8.6.

If the procedures that the grantee intends to use to make known the availability of the rental assistance and services are unlikely to reach persons of any particular race, color, religion, sex, age, national origin,

familial status, or disability who may qualify for such rental assistance and services, the grantee must establish additional procedures that will ensure that such persons are made aware of the rental assistance and services.

Grantee and subrecipients must also comply with the following other Federal Requirements:

- Fair Housing Act
- Uniform Administrative Requirements
- Equal Employment Opportunity Programs
- Minority Business Enterprises
- Nondiscrimination in Federally Assisted Programs
- Age Discrimination
- Women's Business Enterprise
- Drug Free Workplace Act
- Debarred Suspended
- Section 504 of the Rehabilitation Act
- Americans with Debarred, Suspended, Ineligible Contractors
- Affirmative Outreach Disabilities Act
- Section 6002 of the Solid Waste
- Disposal Act, as amended by the Resource Conservation and Recovery Act

Affirmative Outreach

The subrecipient must communicate and make known that use of ESG funded facilities, assistance and services are available to all on a nondiscriminatory basis. subrecipient must develop and implement affirmative outreach written procedures and communication tools and materials to inform persons without regard to race, color, creed, ethnicity, religion, sex, age, national origin, familial status, or disability, how to obtain access to facilities and services.

The subrecipient must be committed to an affirmative action program as well as to comply with all "Equal Opportunity" laws and regulations which provide that no person in the United States shall on the grounds of race, color, creed, religion, sex, familial status, sexual orientation or national origin, be excluded from participation in, be denied the benefits of, or be subjected to discrimination under any program or activity funded in whole or in part with ESG funds.

HOMELESS PARTICIPATION

Unless the grantee is a State, the grantee must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the grantee, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

If the grantee is unable to meet requirement under paragraph (a), it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220.

To the maximum extent practicable, the grantee or subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing

services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

WRITTEN STANDARDS FOR PROVIDING ESG ASSISTANCE

The CDD has provided this policy and procedure manual. The subrecipient must consider how they will administer their program and develop appropriate guidelines specific to the activities that are being provided. Written standards should be established and applied consistently within the subrecipients program.

At a minimum, written standards must include:

- Standards for targeting and providing essential services related to street outreach;
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see above for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance;
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
- Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

Section 6: GLOSSARY OF TERMS

Agency: means any private non-profit organization or unit of general local government to which a grantee provides funds to carry out the eligible activities under the grant and which is accountable to the grantee for the use of the funds provided. See also **Subgrantee and Subrecipient**.

APR: Annual Performance Report

Arrears: The definition of arrears is an overdue payment, pursuant to the terms of the lease. Therefore, if the rent was due on May 10 any payment made after that date due for the month of May would be considered rental arrears, not current rent, even if that payment was made in the same month. For example, a payment made on May 20th would be arrears) ESG funds may be used to pay for rental arrears assistance (which may include late fees on those arrears) through a one-time payment of up to 6 months of rent. ESG funds may be used to pay for fees that are sometimes associated with utility arrears (such as late fees) and regaining utility service (such as reconnect fees). Keep in mind that an arrears payment is only an eligible cost if a tenant would actually be evicted for non-payment of their portion of the rent or utilities (Homelessness Prevention) or the arrears are preventing the household from obtaining permanent housing and achieving stability in that housing (Rapid Re-Housing).

Assessment: is a deeper level of inquiry into the actual problem and the client's strengths and needs related to solving the problem. Assessment helps with service-matching and provides the information needed to determine the expected type, intensity, and duration of assistance a client or household might receive.

At Risk of Homelessness:

- (1) An individual or family who: (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD; (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place (per 576.2 Paragraph 1) and (iii) meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organization or by federal, State, or local government programs for low income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau; Is exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - (F) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the grantee's approved consolidated plan;
- (2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637 (11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330 (h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786 (b)(15)); or

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Act (42 U.S.C 11434a (and the parent(s) or guardians(s) of that child or youth if living with her or him).

CAA: Community Action Agency. See **Subgrantee, Subrecipient or Agency**.

Chronically Homeless:

(1) Is an individual or family who (i) is homeless and lives or resides in a placement not meant for human habitation, a safe haven, or in an emergency shelter; (ii) has been homeless and living or residing in a place not meant for human habitation, a safe haven, or in an emergency shelter continuously for at least one (1) year or on at least 4 separate occasions in the last 3 years, where each occasion was at least 15 days; and (iii) Can be diagnosed with one or more of the following conditions: substance use disorder, serious mental illness, developmental disability (as defined in section 102of the Developmental Disabilities Assistance and Bill of Rights Act of 2000), post-traumatic stress disorder, cognitive impairments resulting from a brain injury, or chronic physical illness or disability; .

(2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital or other similar facility and has resided there for fewer than 90 days if such person met all the criteria in paragraph (1) of this definition, prior to entering that facility; or

(3) The family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all the requirements in paragraph (1) of this definition, including a family’s whose composition has fluctuated while the head of household has been homeless.

CoC: See Continuums of Care.

Consolidated Plan: A plan prepared in accordance with 24 CFR part 91. An approved consolidated plan means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

Continuums of Care (CoC). The group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers, victim service providers, faith-based organizations, governments, businesses, advocates, public housing agencies, school districts, social service providers, mental health agencies, hospitals, universities, affordable housing developers, law enforcement., organizations that server homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Conversion: If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum use is 10 years.

Coordinated Entry: A nationally recognized best practice for homeless housing and services for which established front doors/access points use a standardized assessment process to gather information on people’s needs, preferences, and the barriers they face to regaining housing. Once the assessment has identified the most vulnerable people with the highest needs, the CoC follows established policies and procedures to prioritize households for referrals to appropriate and available housing and supportive services resources. It has been adopted by HUD and is required by the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act as well as 24 CFR 578.7(a)(8) and HUD Notice CPD-17-01.

Current Income: is the income that the household is currently receiving at the time of application for ESG assistance. Income recently terminated should not be included.

De minimus: is a Latin expression that, in the risk assessment world, refers to a level of risk that is too minimal to cause concern.

Department: means the legal entity to which HUD awards an ESG grant and which is accountable for the use of the funds provided. In this case the City of Gary Community Development Department. See also Grantee.

Emergency Shelter: Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless, and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter under FY 2010 Emergency Solutions grant may continue to be funded under ESG. (Including any project (transitional housing) that received funding in FY 2010 as an emergency shelter may continue to be funded under the ESG program, regardless of whether the project meets the revised definition.)

Frequent Moves: is defined as two. For example, when a client moves 2 or more times.

Grantee (Department): means the legal entity to which HUD awards an ESG grant and which is accountable for the use of the funds provided. (See Recipient)

Gross Income is the amount of income earned before any deductions (such as taxes and health insurance premiums) are made.

Homeless: is defined in the "Defining Homeless rule" published 12/5/2011.

1. An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - a. An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - b. An individual or family living in a supervised publicly or privately-operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low income individuals); or
 - c. An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution (meets all the requirements described in #1 above prior to entering that facility).
2. An individual or family who will imminently lose their primary nighttime residence, provided that:
 - a. The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - b. No subsequent residence has been identified; and
 - c. The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks needed to obtain other permanent housing;
3. Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - a. Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7.S.C. 2012), section 17(b) of

- the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- b. Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - c. Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - d. Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
4. Any individual or family who:
- a. Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - b. Has no other residence; and
 - c. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Homeless Management Information System (HMIS) The information system designated by the Continuum of Care to comply with HUD's data collection, management and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at risk of homelessness.

Income Inclusions: Types of income to be counted

Income Exclusions: Types of income that are not to be counted as income

Intake the general process between the client's first point of contact and the decision whether or not to admit the client to a program. The intake process can include screening, assessment, referral, and verification. Intake may or may not result in program admission;

Integrated Disbursement and Information System (IDIS) is the financial management system through which ESG grantees must draw down funds. ESG grantees will not be entering any performance or beneficiary data into IDIS.

IPR: Initial Performance Report

LEP: Limited English Proficiency persons include anyone "who does not speak English as their primary language and who have a limited ability to read, write, speak, or understand English . . ." (HUD LEP Guidance, 72 Fed. Reg. 2732) (Jan. 22, 2007)).

Long Term Period: is defined to mean 60 days.

Major Renovation: If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.

Minimum Use of an Emergency Shelter converted using ESG funds. If the conversion cost of an emergency shelter exceeds 75% of the value of the building before conversion, the minimum period of use is 10 years; otherwise, the minimum period of use is 3 years.

Minimum Use of an Emergency Shelter rehabilitated using ESG funds. If the rehabilitation cost of an emergency shelter exceeds 75% of the value of the building before rehabilitation, the minimum period of use is 10 years; otherwise, the minimum period of use is 3 years.

PASS: Plan to Attain Self-Sufficiency- This is excluded income

QPR: Quarterly Performance Report

Rapid Re-Housing Assistance: The provision of housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to help a literally homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

Recipient: means any state, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general-purpose local government, approved by HUD to assume financial responsibility and which enters into a grant agreement with HUD to administer Emergency Solutions Grant (ESG). Replaces the existing terminology or entities that received grants. For the purpose of this manual the Recipient is the Department of Health and Human Services and is used interchangeably with Grantee.

Referral: referring a client to a particular program for possible help, without any obligation on the part of the receiving program to actually offer or provide the help;

Reparations: Payments paid by a foreign government pursuant to claims filed under the laws of the government by persons who were persecuted during the Nazi era.

Screening: a first-level decision about whether the client is eligible for a program and/or would have a priority for those services. Screening determines who receives assistance;

Subgrantee (Agency/Subrecipient): means any private non-profit organization or unit of general local government to which a grantee provides funds to carry out the eligible activities under the grant and which is accountable to the grantee for the use of the funds provided.

Subrecipient: any unit of general-purpose local government or private nonprofit organization to which a grantee awards ESG grant funds. This replaces the existing terminology for entities that receive subgrants. Governmental organizations, such as public housing agencies or state or local housing finance agencies are not eligible subrecipients under the ESG program. For the purpose of this document, the subrecipient is the Agency contracting with the City of Gary Community Development Department.

Targeting: process of determining the population to whom assistance will be directed. That is, the target population. The targeting process can occur at both the system and the program levels.

Verification: the gathering and review of information to substantiate the crisis situation and support program eligibility and priority determinations

Victim Service Provider: A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

Victim Services: Services offered by rape crisis centers and domestic violence shelters and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault or stalking.

Youth: is defined as less than 25 years of age. This was set at 25 years of age to adequately and appropriately address the unique needs of transition-aged youth, including youth exiting foster care systems to become stable in permanent housing.

Section 7: APPENDIX

CLIENT FILE DOCUMENTATION/RECORDKEEPING REQUIREMENTS BY CATEGORY

Documentation is different for each category; the first consideration is the type of assistance that the individual/family will receive. The following describes the information that is necessary for minimum record keeping requirements.

Regardless of the type of assistance provided, there must be a client file containing documentation that details the reason for the assistance. The documentation should include:

- Verification of Homelessness or At-Risk of Homelessness (Homeless Certification, or Self Declaration of Housing Status)
- Verification of U.S. Citizenship or Lawful Resident (Declaration of Section 214 or U.S. Identification)
- Initial Consultation Form and Case Notes
- Intake and Certification Form
- Follow-up Case Manager/Client Meetings and at least monthly case notes.
- Documented Individualized Housing and Service Plan, including planning a path to permanent housing stability
- Documentation of Financial Assistance payment (Documentation of payment must include the Type of Assistance, Payee Name, Client Name, Check Number and Amount paid using ESG funds).
- Documentation of services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant.
- As applicable, determinations of Ineligibility – For each individual and family determined ineligible to receive ESG, the client file must include documentation of the reason for that determination.
- Documentation of the HMIS Household number or a documented reason why the number is not available.

It is also required to keep a record of all clients that are screened and classified as ineligible. The ESG recordkeeping and reporting requirements state that for each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.

Street Outreach Clients Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs
 - Written observation by the outreach worker; or
 - Written referral by another housing or service provider; or
 - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter
2. For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution –

- Written observation by the outreach worker; or
 - Written referral by another housing or service provider; or
 - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter; and
 - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
 - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.
3. Written documentation that individuals and families are living on the streets (or other places not meant for human habitation) and are unwilling or unable to access services in an emergency shelter.
 4. Documentation of compliance with the applicable requirements for providing service and assistance (576.101) includes:
 - Engagement Documentation: Initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid-re-housing programs
 - Case Management Documentation: Document eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing and individualized housing and service plan, including planning a path to permanent housing stability.
 - Emergency Health Services: Documentation of direct outpatient services provided.
 - Emergency Mental Health Services: Documentation of direct outpatient services provided.
 - Transportation Documentation:
 - Cost of transporting unsheltered people to emergency shelters or other service facilities.
 - Cost of Program participant's travel on public transportation

Street Outreach Clients Category 4 Fleeing/Attempting to Flee Domestic Violence

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
4. Documentation of compliance with the applicable requirements for providing service and assistance (576.101) includes:
 - Engagement Documentation: Initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted

to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid-re-housing programs

- Case Management Documentation: Document eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing and individualized housing and service plan, including planning a path to permanent housing stability.
- Emergency Health Services: Documentation of direct outpatient services provided.
- Emergency Mental Health Services: Documentation of direct outpatient services provided.
- Transportation Documentation:
 - Cost of transporting unsheltered people to emergency shelters or other service facilities.
 - Cost of Program participant's travel on public transportation

Emergency Shelter Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs
 - Written observation by the outreach worker; or
 - Written referral by another housing or service provider; or
 - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter
2. For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution –
 - Written observation by the outreach worker; or
 - Written referral by another housing or service provider; or
 - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter and
 - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
 - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.
3. Documentation of compliance with the applicable requirements for providing service and assistance (576.102) includes:
 - Case Management Documentation: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.
 - Initial Evaluation
 - Documenting eligibility
 - Document Counseling
 - Document securing, coordinating services and obtaining Federal, State, and local benefits;
 - Document program participant progress;
 - Document information and referrals to other providers;
 - Document ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
 - Document an individualized housing and service plan, including planning a path to permanent housing stability.

- Child Care Documentation: Child care provided for program participants
 - Document meals and snacks provided
 - Document appropriate developmental activities provided
 - Documentation verifying the child-care center is licensed
- Education Services Documentation: Document the costs of improving knowledge and basic educational skills
 - Document instruction or training in consumer education
 - Document instruction or training in health education
 - Document substance abuse prevention instruction or training.
 - Document instruction or training in Literacy
 - Document English as a second language instruction or training
 - Document General Education Development (GED) instruction or training
 - Document component services or activities such as screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
- Employment Assistance and Job Training Documentation:
 - Document employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
 - Document stipends provided to program participants in employment assistance and job training programs.
 - Document learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
 - Document services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching;
 - Document referrals to community resources.
- Outpatient Health Services Documentation: Document direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal services Documentation:
 - Document legal advice provided
 - Document the attorney is licensed and in good standing with the bar association
 - Document the matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training Documentation:
 - Document life skills training necessary to assist the program participant to function independently in the community. (i.e., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.)
- Mental health services Documentation:
 - Document direct outpatient treatment by licensed professionals of mental health conditions.
 - Substance abuse treatment services Documentation.
 - Document substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors
 - Document the treatment providers are licensed or certified professionals.

- Document duration of outpatient treatment (up to 30 days)
- Document group and individual counseling sessions
- Document drug testing
- Transportation Documentation:
 - Document transportation of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities.
 - Document program participant's travel on public transportation;
 - Document program participant's use of public transportation.

Emergency Shelter Homeless Category 2 Imminent Risk of Homeless Clients

1. Document applicant is at risk of homelessness
 - A court order resulting from an eviction action notifying the individual or family that they must leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit (pay rent or quit), or a Notice to Terminate issued under state law;
 - For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, - evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or
 - An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance.
 - The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
 - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
 - If the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete; and
2. Certification that no subsequent residence has been identified; and
3. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to reside there for more than 14 days after the date of application for homeless prevention.
4. Documentation of compliance with the applicable requirements for providing service and assistance (576.102) includes:
 - Case Management Documentation: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.
 - Initial Evaluation
 - Documenting eligibility
 - Document Counseling
 - Document securing, coordinating services and obtaining Federal, State, and local benefits;
 - Document program participant progress;
 - Document information and referrals to other providers;
 - Document ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

- Document an individualized housing and service plan, including planning a path to permanent housing stability.
- Child Care Documentation: Child care provided for program participants
 - Document meals and snacks provided
 - Document appropriate developmental activities provided
 - Documentation verifying the child-care center is licensed
- Education Services Documentation: Document the costs of improving knowledge and basic educational skills
 - Document instruction or training in consumer education
 - Document instruction or training in health education
 - Document substance abuse prevention instruction or training,
 - Document instruction or training in Literacy
 - Document English as a second language instruction or training
 - Document General Education Development (GED) instruction or training
 - Document component services or activities such as screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
- Employment Assistance and Job Training Documentation:
 - Document employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
 - Document stipends provided to program participants in employment assistance and job training programs.
 - Document learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
 - Document services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching;
 - Document referrals to community resources.
- Outpatient Health Services Documentation: Document direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal services Documentation:
 - Document legal advice provided
 - Document the attorney is licensed and in good standing with the bar association
 - Document the matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training Documentation:
 - Document life skills training necessary to assist the program participant to function independently in the community. (i.e., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.)
- Mental health services Documentation:
 - Document direct outpatient treatment by licensed professionals of mental health conditions.
- Substance abuse treatment services Documentation.
 - Document substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors

- Document the treatment providers are licensed or certified professionals.
- Document duration of outpatient treatment (up to 30 days)
- Document group and individual counseling sessions
- Document drug testing
- Transportation Documentation:
 - Document transportation of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities.
 - Document program participant's travel on public transportation;
 - Document program participant's use of public transportation.

Emergency Shelter Homeless Category 3 Homeless Under Other Federal Statutes Clients

1. Certification by the subrecipient that the individual or family does not qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute:
 - Certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under
 - Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.),
 - Head Start Act (42 U.S.C. 9831 et seq.),
 - Subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.),
 - Section 330 of the Public Health Service Act (42 U.S.C. 254b),
 - Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.),
 - Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or
 - Subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.),

and

2. Certification of no permanent housing in last 60 days;
 - Referral by a housing or service provider,
 - Written observation by an outreach worker, or
 - Certification by the homeless individual or head of household seeking assistance;

and

3. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days immediately preceding the date of application for homeless assistance, including
 - Recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or,
 - Where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records.
 - Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address

and

4. Documentation of special needs or two or more barriers to employment:
 - Obtain of a written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition).

- Two or more barriers to employment which include: employment records; department of corrections records; literacy, English proficiency tests; lack of a high school degree or General Education Development (GED); a history of unstable employment; or document the applicant is expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability,
5. Documentation of compliance with the applicable requirements for providing service and assistance (576.102) includes:
- Case Management Documentation: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.
 - Initial Evaluation
 - Documenting eligibility
 - Document Counseling
 - Document securing, coordinating services and obtaining Federal, State, and local benefits;
 - Document program participant progress;
 - Document information and referrals to other providers;
 - Document ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
 - Document an individualized housing and service plan, including planning a path to permanent housing stability.
 - Child Care Documentation: Child care provided for program participants
 - Document meals and snacks provided
 - Document appropriate developmental activities provided
 - Documentation verifying the child-care center is licensed
 - Education Services Documentation: Document the costs of improving knowledge and basic educational skills
 - Document instruction or training in consumer education
 - Document instruction or training in health education
 - Document substance abuse prevention instruction or training,
 - Document instruction or training in Literacy
 - Document English as a second language instruction or training
 - Document General Education Development (GED) instruction or training
 - Document component services or activities such as screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
 - Employment Assistance and Job Training Documentation:
 - Document employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
 - Document stipends provided to program participants in employment assistance and job training programs.
 - Document learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
 - Document services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching;
 - Document referrals to community resources.

- Outpatient Health Services Documentation:
 - Document direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal services Documentation:
 - Document legal advice provided
 - Document the attorney is licensed and in good standing with the bar association
 - Document the matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training Documentation:
 - Document life skills training necessary to assist the program participant to function independently in the community. (i.e., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.)
- Mental health services Documentation:
 - Document direct outpatient treatment by licensed professionals of mental health conditions.
- Substance abuse treatment services Documentation.
 - Document substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors
 - Document the treatment providers are licensed or certified professionals.
 - Document duration of outpatient treatment (up to 30 days)
 - Document group and individual counseling sessions
 - Document drug testing
- Transportation Documentation:
 - Document transportation of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities.
 - Document program participant's travel on public transportation;
 - Document program participant's use of public transportation.

Emergency Shelter Homeless Category 4 Fleeing/Attempting to Flee Domestic Violence

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
4. Documentation of compliance with the applicable requirements for providing service and assistance (576.102) includes:
 - Case Management Documentation: Assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible.

- Initial Evaluation
- Documenting eligibility
- Document Counseling
- Document securing, coordinating services and obtaining Federal, State, and local benefits;
- Document program participant progress;
- Document information and referrals to other providers;
- Document ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
- Document an individualized housing and service plan, including planning a path to permanent housing stability.
- Child Care Documentation: Child care provided for program participants.
 - Document meals and snacks provided
 - Document appropriate developmental activities provided
 - Documentation verifying the child-care center is licensed
- Education Services Documentation: Document the costs of improving knowledge and basic educational skills
 - Document instruction or training in consumer education
 - Document instruction or training in health education
 - Document substance abuse prevention instruction or training,
 - Document instruction or training in Literacy
 - Document English as a second language instruction or training
 - Document General Education Development (GED) instruction or training
 - Document component services or activities such as screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.
- Employment Assistance and Job Training Documentation:
 - Document employment assistance and job training programs, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential.
 - Document stipends provided to program participants in employment assistance and job training programs.
 - Document learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates.
 - Document services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching;
 - Document referrals to community resources.
- Outpatient Health Services Documentation:
 - Document direct outpatient treatment of medical conditions provided by licensed medical professionals.
- Legal services Documentation:
 - Document legal advice provided
 - Document the attorney is licensed and in good standing with the bar association
 - Document the matters that interfere with the program participant's ability to obtain and retain housing. Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.
- Life skills training Documentation:

- Document life skills training necessary to assist the program participant to function independently in the community. (i.e., budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.)
- Mental health services Documentation:
 - Document direct outpatient treatment by licensed professionals of mental health conditions.
- Substance abuse treatment services Documentation.
 - Document substance abuse treatment services designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors
 - Document the treatment providers are licensed or certified professionals.
 - Document duration of outpatient treatment (up to 30 days)
 - Document group and individual counseling sessions
 - Document drug testing
- Transportation Documentation:
 - Document transportation of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities.
 - Document program participant's travel on public transportation;
 - Document program participant's use of public transportation.

Rapid Re-Housing Category 1 Literally Homeless Clients

1. For applicants who lack a fixed, regular, and adequate nighttime residence, meaning: car; park; abandoned building; bus or train station; airport; camping ground; or hotel and motels paid for by charitable organizations or federal, state or local government programs
 - Written observation by the outreach worker; or
 - Written referral by another housing or service provider; or
 - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter
2. For an individual who is exiting an institution where he/she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution –
 - Written observation by the outreach worker; or
 - Written referral by another housing or service provider; or
 - Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter; and
 - Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker, or
 - Written record of intake worker's due diligence in attempting to obtain the evidence described above and certification by the applicant that states he/she is exiting or has just exited an institution where he/she resided for 90 days or less.
3. Monthly case manager meeting case notes
4. Documented individualized plan to help retain permanent housing after the ESG assistance ends.
5. Verification of Income – Not required for Rapid Re-Housing until recertification at 1-year mark.

Rental Assistance Agreements and Payments

- Copies of all leases and rental assistance agreements for the provision of rental assistance,
- Documentation of payments made to owners for the provision of rental assistance

- Supporting Documentation for these payments, including dates of occupancy by program participants

Utility Allowance:

- Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.

Shelter and Housing Standards: Documentation of compliance with the shelter and housing standards:

- Lead-Based Paint documentation
- Habitability Standards
- Environmental review documentation (24 CFR Part 50)
- Reassessment at one year requires:
- Annualized Income AT OR BELOW 30% AMI
- Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

Rapid Re-Housing Category 4 Fleeing/Attempting to Flee DV

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker.

For non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Documentation of compliance with the applicable requirements for providing service and assistance (576.104) includes:

- Monthly case manager meeting case notes
- Documented individualized plan to help retain permanent housing after the ESG assistance ends.
- Verification of Income – Not required for Rapid Re-Housing until recertification at 1-year mark.

Rental Assistance Agreements and Payments

- Copy of a written lease from the landlord with the client for the of rental assistance.
- Copy of rental assistance agreement between subrecipient and the home owner/landlord.
- Copy of Eviction Notice; Notice to Quit (pay rent or quit); Demand for Possession or Summons & Complaint.
- Housing Plan
- Documentation of Rent Reasonableness
- Documentation of Fair Market Rent
- Documentation of payments made to owners for the provision of rental assistance
- Supporting Documentation for these payments, including dates of occupancy by program participants

Utility Allowance:

- Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.

Shelter and Housing Standards: Documentation of compliance with the shelter and housing standards

- Lead-Based Paint documentation
- Habitability Standards
- Environmental review documentation (24 CFR Part 50)
- Reassessment at one year requires:
- Annualized Income AT OR BELOW 30% AMI
- Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

Homelessness Prevention Category 2 – Imminent Risk of Homelessness

1. Document applicant is at risk of homelessness

- A court order resulting from an eviction action notifying the individual or family that they must leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit (pay rent or quit), or a Notice to Terminate issued under state law;
- For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, - evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or
- An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance.
 - The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
 - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
 - If the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete; and

2. Certification that no subsequent residence has been identified; and

3. Self-certification or other written documentation that the individual lacks the financial resources and support necessary to reside there for more than 14 days after the date of application for homeless prevention. Acceptable evidence includes:

- Source documents (e.g., notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);
- To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the intake staff of the oral verification by the relevant third party that the applicant meets the criteria under paragraph (1)(ii) of the definition of "at risk of homelessness" in §576.2; or

- To the extent that source documents and third-party verification are unobtainable, a written statement by the intake staff describing the efforts taken to obtain the required evidence; and
4. Documentation of one of the following conditions: To the extent that source documents and third-party verification are unobtainable, a written statement by the intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the following criteria. If a visit is not practicable or relevant to the determination, a written statement by the intake staff describing the efforts taken to obtain the required evidence.
 - Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - Is living in the home of another because of economic hardship;
 - Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organization or by federal, State, or local government programs for low income individuals;
 - Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 people per room, as defined by the U.S. Census Bureau;
 - Is exiting a publicly funded institution or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the grantee's approved consolidated plan;
 5. Documentation of compliance with the applicable requirements for providing service and assistance (576.103) includes:
 6. Monthly case manager meeting case notes
 7. Documented individualized plan to help retain permanent housing after the ESG assistance ends.
 8. Verification of Income (Has an annual income below 30 percent of median family income for the area, as determined by HUD at initial eligibility determination)

Rental Assistance Agreements and Payments

- Copy of a written lease from the landlord with the client for the provision of rental assistance.
- Copy of rental assistance agreement between subrecipient and the home owner/landlord.
- Copy of Eviction Notice; Notice to Quit (pay rent or quit); Demand for Possession or Summons & Complaint.
- Housing Plan
- Documentation of Rent Reasonableness
- Documentation of Fair Market Rent
- Documentation of payments made to owners for the provision of rental assistance
- Supporting Documentation for these payments, including dates of occupancy by program participants

Utility Arrearages

- Copy of Shut-Off Notice that is in a household member's name.

Utility Allowance:

- Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.

Shelter and Housing Standards: Documentation of compliance with housing standards

- Lead-Based Paint documentation

- Habitability Standards
- Environmental review documentation (24 CFR Part 50)

Reassessment every 3 months requires:

- Annualized Income AT OR BELOW 30% AMI
- Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

Homelessness Prevention Category 3 – Homeless Under Other Federal Statutes

1. Certification by the subrecipient that the individual or family does not qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute:
 - Certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under
 - Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.),
 - Head Start Act (42 U.S.C. 9831 et seq.),
 - Subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.),
 - Section 330 of the Public Health Service Act (42 U.S.C. 254b),
 - Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.),
 - Section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or
 - Subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), and
2. Certification of no permanent housing in last 60 days;
 - Referral by a housing or service provider,
 - Written observation by an outreach worker, or
 - Certification by the homeless individual or head of household seeking assistance; and
3. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days immediately preceding the date of application for homeless assistance, including
 - Recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or,
 - Where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records.
 - Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address; and
4. Documentation of special needs or two or more barriers to employment:
 - Obtain of a written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition).
 - Two or more barriers to employment which include: employment records; department of corrections records; literacy, English proficiency tests; lack of a high school degree or General Education Development (GED); a history of unstable employment; or document the applicant is expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories

- of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability,
- 5. Documentation of compliance with the applicable requirements for providing service and assistance (576.103) includes:
 - Monthly case manager meeting case notes
 - Documented individualized plan to help retain permanent housing after the ESG assistance ends.
- 6. Verification of Income (Has an annual income below 30 percent of median family income for the area, as determined by HUD at initial eligibility determination)
- 7. Documentation of one or more "At Risk of Homelessness" conditions found on page 30 of the ESG Policy Manual.

Rental Assistance Agreements and Payments

- Copy of written lease with the landlord with the client for the provision of rental assistance.
- Copy of rental assistance agreement between subrecipient and the home owner/landlord.
- Copy of Eviction Notice; Notice to Quit (pay rent or quit); Demand for Possession or Summons & Complaint.
- Housing Plan
- Documentation of Rent Reasonableness
- Documentation of Fair Market Rent
- Documentation of payments made to owners for the provision of rental assistance
- Supporting Documentation for these payments, including dates of occupancy by program participants

Utility Arrearages

- Copy of Shut-Off Notice that is in a household member's name.

Utility Allowance:

- Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.

Shelter and Housing Standards:

- Documentation of compliance with housing standards
- Lead-Based Paint documentation
- Habitability Standards
- Environmental review documentation (24 CFR Part 50)

Reassessment every 3 months requires:

- Annualized Income AT OR BELOW 30% AMI
- Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

Homelessness Prevention Category 4 Fleeing/Attempting to Flee Domestic Violence

For Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. (Skip to #4 below)

For non-Victim Service Providers:

1. An oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the care worker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
2. Certification by the individual or head of household that no subsequent residence has been identified; and
3. Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
4. Monthly case manager meeting case notes
5. Documented individualized plan to help retain permanent housing after the ESG assistance ends.
6. Verification of Income (Has an annual income below 30 percent of median family income for the area, as determined by HUD at initial eligibility determination
7. Documentation of one or more "At Risk of Homelessness" conditions found on page 30 of the ESG Policy Manual.
8. Documentation of compliance with the applicable requirements for providing service and assistance (576.104) includes:

Rental Assistance Agreements and Payments

- Copy of a written lease from the landlord with the client for the provision of rental assistance.
- Copy of rental assistance agreement between subrecipient and the home owner/landlord.
- Copy of Eviction Notice; Notice to Quit (pay rent or quit); Demand for Possession or Summons & Complaint.
- Housing Plan
- Documentation of Rent Reasonableness
- Documentation of Fair Market Rent
- Documentation of payments made to owners for the provision of rental assistance
- Supporting Documentation for these payments, including dates of occupancy by program participants

Utility Arrearages

- Copy of Shut-Off Notice that is in a household member's name.

Utility Allowance

- Document the monthly allowance for utilities (excluding phone) used to determine compliance with the rent restriction.

Shelter and Housing Standards: Documentation of compliance with housing standards

- Lead-Based Paint documentation
- Habitability Standards
- Environmental review documentation (24 CFR Part 50)

Reassessment every 3 months requires:

- Annualized Income AT OR BELOW 30% AMI
- Documentation as to whether persons lack sufficient resources and support networks necessary to retain the housing without assistance.

Grantee SF-424's and Certification(s)

OMB Number: 2506-0117
 Expiration Date: 12/31/2021

Application for Federal Assistance SF-424			
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changes/Correction Application		* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision * If Revision see Applicable Title(s) * Other (Specify):	
* 3. Date Received: [Redacted]		* 4. Applicant Ident. No.: [Redacted]	
* 5a. Federal Entity Ident. No.: [Redacted]		* 5b. Federal Award Identifier: [Redacted]	
State Use Only: * 6. Date Received by State: [Redacted] * 7. State Application Identifier: [Redacted]			
8. APPLICANT INFORMATION			
* 8a. Legal Name: CITY OF LAKE			
* 8b. Employer/Exemptor Identification Number (EIN) (IN): [Redacted]		* 8c. UFI: YAF064000000	
d. Address:			
* Street 1:	401 BROADWAY		
* Street 2:	[Redacted]		
* City:	LAKE		
* County/Parish:	LAKE		
* State:	LA - Louisiana		
* Province:	[Redacted]		
* Country:	USA: UNITED STATES		
* Zip (Postal Code):	70001750		
e. Organizational Unit:			
* Department Name: COMMUNITY DEVELOPMENT		* Division Name: [Redacted]	
f. Name and contact information of person to be contacted on matters involving this application:			
* Title:	[Redacted]	* First Name:	ARLBERG
* Middle Name:	D.	[Redacted]	
* Last Name:	ROBERTS	[Redacted]	
* Suffix:	[Redacted]	[Redacted]	
* Alt:	[Redacted]		[Redacted]
* Organizational Affiliation: [Redacted]			
* Telephone Number: 225-681-5075		* Fax Number: 225-681-5085	
* Email: arlberg@cityoflake.gov			

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type: <input type="text" value="City or Township Government"/> Type of Applicant 2: Select Applicant Type: <input type="text"/> Type of Applicant 3: Select Applicant Type: <input type="text"/> ^ Other (specify): <input type="text"/>	
* 10. Name of Federal Agency: <input type="text" value="U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT"/>	
11. Catalog of Federal Domestic Assistance Number: <input type="text" value="14.0014"/> CFDA Title: <input type="text" value="COMMUNITY DEVELOPMENT BLOCK GRANT"/>	
* 12. Funding Opportunity Number: <input type="text" value=""/>	
* Title: <input type="text" value=""/>	
13. Competition Identification Number: <input type="text"/> Title: <input type="text"/>	
14. Areas Affected by Project (Cities, Counties, States, etc.): <input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
* 15. Descriptive Title of Applicant's Project: <input type="text" value="Public Facilities & Improvement; Public Services; Housing; Clearance and Demolition; Code Enforcement; Economic Development; Administration"/>	
Attach supporting documents as specified in agency instructions. <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant: * b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

* a. Start Date: * b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="3,410,692.00"/>
* b. Applicant	<input type="text" value=""/>
* c. State	<input type="text" value=""/>
* d. Local	<input type="text" value=""/>
* e. Other	<input type="text" value=""/>
* f. Program Income	<input type="text" value=""/>
* g. TOTAL	<input type="text" value="3,410,692.00"/>

* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes No

If "Yes," provide explanation and attach

21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the "required assurances" and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)

I AGREE

* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.


Authorized Representative:

Prefix: * First Name:
 Middle Name:
 Last Name:
 Suffix:

* Title:

* Telephone Number: * Fax Number:

* Email:

* Signature of Authorized Representative:  * Date Signed:

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0039
 Expiration Date: 02/20/2025

Public reporting burden for this collection of information is estimated to average 7.5 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:



1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to ensure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4720-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4611 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683 and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicap; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§2901d-3 and 2901e-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-87)
 Prescribed by GMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-648) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§ 1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§ 276a to 276a-7), the Copeland Act (40 U.S.C. § 276c and 18 U.S.C. § 874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§ 327-333) regarding labor standards for federally assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) notification of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-192) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§ 1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§ 1401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§ 1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 105 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. § 470), EO 11583 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§ 469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Producing a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		NAME	
APPLICANT NAME		DATE SUBMITTED	
CITY OF GARY			

SI-424D (Rev. 7-07) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Pre-application <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate item(s): <input type="checkbox"/> Other (Specify): <input type="checkbox"/> Other (Specify):
* 3. Date Received: <input type="text" value=""/>	4. Applicant Identifier: <input type="text" value=""/>	
5a. INDE's Agency Identifier: <input type="text" value=""/>	5b. Federal Award Identifier: <input type="text" value="M-23-MC-1B-0261"/>	
State Use Only:		
6. Date Received by State: <input type="text" value=""/>	7. State Application Identifier: <input type="text" value=""/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="POLY TECH INC"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="25-6544940"/>	* c. UCI: <input type="text" value="24768981245"/>	
* d. Address:		
* Street1: <input type="text" value="401 BRUNSWICK"/>	<input type="text" value=""/>	
Street2: <input type="text" value=""/>	<input type="text" value=""/>	
* City: <input type="text" value="GARY"/>	<input type="text" value=""/>	
* County/Parish: <input type="text" value="LAKE"/>	<input type="text" value=""/>	
* State: <input type="text" value="IN: Indiana"/>	<input type="text" value=""/>	
* Province: <input type="text" value=""/>	<input type="text" value=""/>	
* Country: <input type="text" value="USA: UNITED STATES"/>	<input type="text" value=""/>	
* Zip/Postal Code: <input type="text" value="464021232"/>	<input type="text" value=""/>	
* e. Organizational Unit:		
* Department Name: <input type="text" value="COMMUNITY DEVELOPMENT"/>	* Division Name: <input type="text" value=""/>	
* f. Name and contact information of person to be contacted on matters involving this application:		
* Prefix: <input type="text" value="MR."/>	* First Name: <input type="text" value="KYLENE"/>	<input type="text" value=""/>
* Middle Name: <input type="text" value="D."/>	<input type="text" value=""/>	
* Last Name: <input type="text" value="COLVIER"/>	<input type="text" value=""/>	
* Suffix: <input type="text" value=""/>	<input type="text" value=""/>	
* Title: <input type="text" value="DIRECTOR"/>	<input type="text" value=""/>	
* Organizational Affiliation: <input type="text" value=""/>		
* Telephone Number: <input type="text" value="2158615075"/>	* Fax Number: <input type="text" value="2158313365"/>	
* Email: <input type="text" value="kcolviera@polytech.org"/>		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="C: City or Township Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT"/>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.339"/> <p>CFDA Title:</p> <input type="text" value="HOME INVESTMENT PARTNERSHIPS PROGRAM GRANT"/>	
<p>* 12. Funding Opportunity Number:</p> <input style="background-color: yellow;" type="text"/> <p>* Title:</p> <input style="background-color: yellow;" type="text"/>	
<p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </div>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="CHDO Set A-Side; Homeownership; Affordable Housing; Administration."/>	
<p>Attach supporting documents as specified in agency instructions.</p> <div style="display: flex; justify-content: space-around;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </div>	

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009
 Expiration Date: 02/29/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0340-0042) Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4720-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4601 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residential structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681, 1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Crime and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§2904d-3 and 2904e-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 124D (Rev. 7-97)
 Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7326) which limit the political activities of employees whose principal employer's activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-197) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11583 (identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§409a-1 et seq.)
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		NAME	
APPLICANT NAME		DATE SUBMITTED	
CITY OR COUNTY		7-31-23	

SI-121D (Rev. 7-97) Back

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Pre-application/LOI <input checked="" type="checkbox"/> Application <input type="checkbox"/> Change/Corrected Application	* 2. Type of Application: <input type="checkbox"/> New <input checked="" type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, describe appropriate change(s) * Other (Specify):
* 3. Date Received: [REDACTED]	4. Applicant Identifier:	
6e. Federal Entity Identifier:	5b. Federal Award Identifier: E-24-DC-19-3035	
State Use Only:		
6. Date Received by State:	7. State Application Identifier:	
B. APPLICANT INFORMATION:		
* a. Legal Name: COMMUNITY		
* b. Employee/Taxpayer Identification Number (EIN/TIN): 38-0001040	* c. UIC: 2158815081	
d. Address:		
* Street1: 400 UNIVERSITY	* Street2:	
* City: CARY	* Country/Parish: NC	
* State: NC	* Province:	
* Country: USA: UNITED STATES	* Day / Postal Code: 27513	
e. Organizational Unit:		
Department Name: COMMUNITY DEVELOPMENT	Division Name:	
f. Name and contact information of person to be contacted on matters involving this application:		
First Name: M.	* First Name: ARLENE	
Middle Name: D.	* Last Name: COLVIA	
Suffix:	Title: DIRECTOR	
Organizational Affiliation:		
* Telephone Number: 2525815075	* Fax Number: 2525815081	
* Email: arlene@agency.gov		

Application for Federal Assistance SF-424	
<p>* 9. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="C: City or Township Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT"/>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14.231"/> <p>CFDA Title:</p> <input type="text" value="EMERGENCY SOLUTIONS GRANTS PROGRAM"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text"/> <p>* Title:</p> <input type="text"/>	
<p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <p style="text-align: right;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachments"/> </p>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="Emergency Shelter; Rapid Rehousing; Homelessness Prevention; Data Collection; Administration"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <p style="text-align: center;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </p>	

T

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4340-0039
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden, to the Office of Management and Budget, Paperwork Reduction Project (0346-0042), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

NOTE: Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


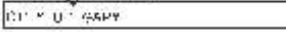

1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progress reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4728-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683 and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§5101-5107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee-3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by GMB Circular A-102

11. Will comply, or has already complied, with the requirements of Title II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-643) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7326) which limit the political activities of employees whose principle employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a (1) 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(e) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with any environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 170(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-206).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1986, as amended (16 U.S.C. §470), EO 11583 (identification and protection of historic properties) and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§466a-1 et seq.)
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect; or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL		TITLE	
		NAME	
		7-31-23	
APPLICANT NAME		DATE SUBMITTED	
			

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CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing.

Uniform Relocation Act and Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

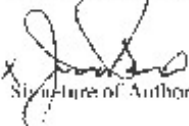
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

- 1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
- 2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
- 3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction --The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 4974) and implementing regulations at 24 CFR Part 75.


Signature of Authorized Official

8-1-23
Date

Mayor
Title

Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

Following a Plan -- It is following a current consolidated plan that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. Maximum Feasible Priority. With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

2. Overall Benefit. The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2022, 2023, 2024 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

3. Special Assessments. It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically blocking entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

Compliance with Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

Compliance with Laws -- It will comply with applicable laws.

X 
Signature of Authorized Official

7-31-23
Date

Mayor
Title

OPTIONAL Community Development Block Grant Certification – Not Applicable

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(e):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature of Authorized Official

Date

Title

Specific HOME Certifications

The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

Eligible Activities and Costs -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

Subsidy layering -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature of Authorized Official

7-30-23
Date

Mayer
Title

Emergency Solutions Grants Certifications

The Emergency Solutions Grants Program recipient certifies that:

Major rehabilitation/conversion/renovation If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

Matching Funds – The recipient will obtain matching amounts required under 24 CFR 576.201.

Confidentiality – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

Discharge Policy - The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons

X 

Signature of Authorized Official

7-31-23

Date

Mayer
Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:

Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Housing Opportunities for Persons With AIDS Certifications – Not Applicable

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the consolidated plan;

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility.
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature of Authorized Official

Date _____

Title