

**NOTICE OF AVAILABILITY
FINAL 2011 ACTION PLAN
AND
AMENDMENTS TO THE FINAL 2011 ACTION PLAN**

Notice is hereby given that the St. Joseph County Housing Consortium has available for public review, copies of the final 2011 Action Plan to the 2010 to 2014 Housing and Community Development Plan for the cities of Mishawaka and South Bend, and St. Joseph County. The HCD Plan addresses housing and community development needs and strategies, including an action plan for the annual use of Emergency Shelter/Solutions Grant (ESG), HOME Investment Partnership Program (HOME) and Community Development Block Grant (CDBG) funds.

Additionally, one (1) amendment to the 2011 Action Plan is available for public review:

- 1) Allocation process for 2nd allocation of Emergency Solutions Grant in the amount of \$69,640

There will be a 30 day public comment period on the proposed amendment from April 3, 2012 to May 3, 2012. A public hearing will begin at 5:30 pm, Tuesday, April 17, 2012 in the Community and Economic Development Offices at 227 W. Jefferson Blvd., 12th floor, South Bend, IN 46601. The conference room is handicapped accessible. TDD users can request additional information by calling 235-5567. If special assistance for persons with disabilities is needed at the hearing, please call (574) 235-5841, 48 hours in advance so such arrangements can be made. Additional information is available in the City of South Bend's Department of Community and Economic Development, 227 W. Jefferson Blvd., South Bend, IN 46601. Written comments can be submitted to the Department at the same address and will be accepted until Thursday May 3, 2012 at 5pm.

The 2010-2014 HCD Plan, the 2011 Action Plan, and the amendments to the 2011 Action Plan can be reviewed at the following handicapped accessible locations in addition to the City of South Bend's web site at www.southbendin.gov/living/community_development, click on HCD Plan then 2011 Action Plan or Amendment.

- All branches of the St. Joseph County and Mishawaka, Public Libraries
- The Walkerton and New Carlisle-Olive Township Public Library
- The City of South Bend's Department of Community and Economic Development, 12th floor County-City Building, 227 W. Jefferson
- The City of South Bend City Clerk's Office, 4th floor County-City Building, 227 W. Jefferson
- The City of Mishawaka's Department of Planning and Community Development, 600 E. Third Street, Mishawaka.

EQUAL OPPORTUNITY

We are pledged to the letter and spirit of U.S. policy for achieving equal opportunity throughout the Nation. We encourage and support affirmative advertising and marketing to achieve no barriers to obtaining housing and/or business opportunities because of race, color, religion, sex, handicap, familial status or national origin.

Donald Fozo
Member, St. Joseph County Housing Consortium

**ESG (Emergency Solutions Grant) Substantial Amendment
Program Year 2011**

Please complete the form, make all necessary attachments, convert to .pdf, and submit electronic and hard copies to the Indianapolis HUD Field Office, attn: John Dorgan, Acting CPD Director
151 N. Delaware St. Suite 1200, Indianapolis, IN 46204.

Summary Information

City of South Bend

Second allocation FY2011 ESG \$69,640

As listed in the Annual Plan, the criteria for a substantial amendment are:

A substantial amendment is required after any substantial changes in the Annual Action Plan of the Final HCD Plan are made (this includes changes in funding of more than \$30,000, cancellation or addition of any program, and substantial change in the location of any program or project). This document is the substantial amendment to the St. Joseph County Housing Consortium Housing and Community Development Plan for 2011. This amendment addresses the Emergency Solutions Grant (ESG) 2nd allocation of funding.

The HUD required certifications and SF-424 form are submitted to HUD with the final document..

Table of Contents

- Consultation Process;
- Citizen Participation Process;
- Matching Funds;
- Proposed Activities
- Detailed Budget;
- Written Standards for the Provision of ESG Assistance;
- Process for Making Sub-Awards;
- Homeless Participation Requirement;
- Performance Standards; and
- SF-424 and Certifications.

You must attach an SF-424 and signed Certifications for this submission to be complete.

Consultation Process

Describe how the Recipient consulted with the Continuum of Care within the geographic area to:

- (1) Determine how to allocate ESG funds for eligible activities;*

The City proposed to the St. Joseph County Continuum of Care to award the second 2011 allocation among the 3 sub-grantee agencies currently working with HPRP. This proposal was based on: (1) the fact that the shelter operations emphasis of the 1st allocation vs. the rapid re-housing emphasis of the 2nd allocation; and (2) given the wind down of HPRP the ESG funds would be used to align the ESG and HPRP efforts.

(2) *develop the performance standards for activities funded under ESG; and*

The City developed performance standards based on the regulations and desired outcomes, and experience with HPRP. These draft performance standards were shared with the Continuum of Care for feedback and modified as appropriate.

(3) *develop funding, policies, and procedures for the operation and administration in HMIS.*

The Center for the Homeless is the Continuum's lead agency with regard to HMIS. The Center maintains an individual as the lead point person who can assist with training and any HMIS issues. The Center contracts directly with the provider Client Trac for HMIS service. All HMIS users follow confidentiality and privacy requirements, and maintain limited HMIS access to specific and essential staff /users.

Citizen Participation Process

(1) *Summarize citizen participation used;*

TheHCD Plan citizen participation process was followed. The Plan states that the original Plan and any substantial amendments are made available to the public; a public hearing is held; and a 30 day public comment period (unless a shorter time period shall be permitted by HUD) is offered to allow citizens to comment on the changes. This substantial amendment was the subject of a public notification process printed in the South Bend Tribune April 2, 2012, with a public comment period beginning April 3- May 3, 2012. A public hearing was held Tuesday April 17, 2012.

(2) *Summarize the public comments or views received; and*

To be included following the public comment period

(3) *Summarize the comments or views not accepted and include the reasons for not accepting those comments or views).*

To be included following the public comment period.

Matching Funds

(1) *List the types and amounts of cash or non-cash resources used as match;*

Three types of match will be used for ESG match: cash; volunteer labor and in-kind donations related to office space and equipment. The dollar amount of match will be \$69,640 and is projected to be as follows:80% in cash of private or United Way donations; 15% in donated labor; and 5% as in-kind labor.

(2) *List the proposed uses of match resource.*

Staff time; program supplies;

Proposed Activities & Funding Priorities

Table 3C: Please complete and attach for each activity to be funded as part of this Substantial Amendment.

Table available at: <http://www.hud.gov/offices/cpd/about/conplan/toolsandguidance/guidance/>

Discussion of Funding Priorities:

- (1) Describe the rationale for assigning the relative funding levels to the proposed activities. (If possible, use locally-relevant data to support the funding priorities to illustrate how the funding priorities will support the national priorities established in Opening Doors: Federal Strategic Plan to Prevent and End Homelessness.)**

The St. Joseph County HCD Plan states the St. Joseph County Continuum of Care has established and works towards the following objectives: (1) Increase the percentage of homeless persons staying in permanent housing over 6 months; (2) Increase the percentage of homeless persons moving from transitional housing to permanent housing. Towards this end the second allocation of ESG funds will be used for Rapid Re-Housing and Homelessness Prevention using approximately the same percentage split among these activities as has been the case during the last month's of HPRP implementation. This decision was made based on the experience of administering the HPRP program and is seen as a bridge in preparation for the HPRP end in July 2012. There is still a need for these type of services as is demonstrated by the high demand for this program. The use of funds for the rapid re-housing will make a larger impact on the reduction in homelessness, while the funding for homelessness prevention allows a more limited effort to address the more difficult cases. This proposed use and split of funds was discussed and agreed to by the Continuum of Care..

- (2) Identify any obstacles to addressing underserved needs in the community.**

A recent and significant obstacle is the reduction of State funding, and the lack of availability of State ESG funding, to those agencies in St. Joseph County. These reductions from funds previously available do not have a counterpart from another source to cover the loss. This can result in a reduction of staff which hampers the ability to provide service at the level anticipated, and/or desired. The limitation of short term rental assistance dollars in the community as compared to the need is a major obstacle. The economy and state of unemployment offers a new and expanding challenge as the services are now sought by even more individuals and families.

Detailed Budget & Declaration of FY2010 Commitments

Activity Type	Obligated Amount
Homeless Assistance	\$ 116531
Homelessness Prevention	\$ 1604
Administrative Activities	\$ 5,000

Total FY 2010 Award

\$ 123,515

FY 2011 Detailed Budget Table

First Allocation		123,805		FY 2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations	
Second Allocation		69,640			
Grant Amount		193,445			
Total Administration		5,000			
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$116,832	\$0		\$116,832
	<i>Rehab/Conversion</i>	\$0	\$0		\$0
	<i>Operations</i>	\$110,066	\$0		\$110,066
	<i>Essential Services</i>	\$6,766	\$0		\$6,766
	Homelessness Prevention	\$1,973	\$0		\$1,973
	Administration	\$5,000	\$0		\$5,000
	Emergency Shelter Grants Subtotal	\$123,805	\$0		\$123,805
Emergency Solutions Grants Program	Emergency Shelter**			\$0	\$0
	<i>Renovation**</i>			\$0	\$0
	<i>Operation**</i>			\$0	\$0
	<i>Essential Service**</i>			\$0	\$0
	<i>URA Assistance**</i>			\$0	\$0
	Street Outreach - Essential Services**			\$0	\$0
	HMIS				\$0
	Rapid Re-housing		\$0	\$40,294	\$40,294
	<i>Housing Relocation and Stabilization Services</i>				\$16,117
	<i>Tenant-Based Rental Assistance</i>				\$24,177
	<i>Project-Based Rental Assistance</i>				\$0
	Homelessness Prevention		\$0	\$19,846	\$19,846
	<i>Housing Relocation and Stabilization Services</i>				\$3,970
	<i>Tenant-Based Rental Assistance</i>				\$15,876
	<i>Project-Based Rental Assistance</i>				\$0
Administration				\$9,500	

	Emergency Solutions Grants Subtotal		\$0	\$69640	\$69640
			Total Grant Amount		\$193445

Written Standards for Provision of ESG

(1) Describe the standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG;

The sub-grantees will use an assessment process to determine and document participant eligibility, including documentation supporting the requirement that eligible participants would be homeless "but for" this assistance. Sub-grantees must carefully assess potential program participants to determine the level of services needed, other resources available to assist the potential program participant, and the appropriateness of participation in the HPRP. Sub-grantees must tailor the amount of assistance to the needs and circumstances of the household, so that only the minimum amount needed to obtain housing stability is provided. Program participants requiring longer-term housing assistance and services should be directed to alternative programs than can provide the necessary services and financial assistance.

(2) Describe the policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers;

All ESG sub-grantees are expected to work collaboratively to coordinate funding that addresses the needs of the entire continuum. To achieve these goals, the Continuum of Care requires that all sub-grantee service providers will:

A. Participate in a coordinated assessment system, where client entry into homelessness prevention or rapid re-housing programs can begin at any point within the system. Service providers will use a common assessment tool that will allow providers to enter data on a client and provide transfer information when a client fits the services of another provider, without having to engage in another assessment. Reasons for client transfer can include better fit in a specialized program, the correct geographic service area, and available resources within the community.

B. Establish a staff member as a point of contact for other case managers and members of the service provider continuum of care. This contact should be able to provide information for other housing case managers on what current programs and resources are available to clients entering into the provider system through their organization.

C. Attend all coordinated training for case managers within the homelessness prevention and rapid re-housing provider system. Each subrecipient is expected to send at least one staff member and share all lessons learned with all housing case management staff. Subrecipients will also participate in meetings of program staff to share best practices and engage in collective problem solving. Meetings will be facilitated by the Continuum of Care.

(3) Describe the policies and procedures for selecting and prioritizing eligible families and individuals for homelessness prevention assistance and for rapid re-housing assistance;

Clients will be assisted on a first come first served basis. If the individual/families are determined to be eligible for assistance (client is homeless or would be homeless "but for" this assistance and is income eligible (<50% AMI)).

(4) Describe the standards for determining the share, if any, of rent and utilities costs that each program participant must pay while receiving homeless prevention or rapid re-housing assistance;

At intake and recertification of program eligible clients, an Income & Rent Calculation worksheet is utilized. This document accounts for variances in people's circumstances - number of children, whether or not they receive child support or disability, whether they're working, what bills they are responsible for, etc. This way, case managers are able to limit the amount of utility subsidy provided in a fair way - but a limit is very important. In addition, this document helps account for when a client would be able to afford paying some rent. If a client receives income, the first assistance that decreases is the utility subsidy - clients take on their own utility bills (or a portion of them). When a client receives enough income to afford the entire amount of their bills - and some rent (based on all the factors) - the document gives the portion the client should pay.

A hardship waiver is handled similar to the HPRP process through the use of an "interim recertification". If a client was unable to pay their portion of the bills, the client will have to bring in all documentation of current income (a TPQY from social security for them and any other person in the household, a workone printout for them and any other person over 18 in the household, a child support print out, 4-8 weeks of pay stubs, documentation of any other income). Then, case managers use that documentation and fill out a new income & rent calculation. While filling out all the recert paperwork case managers get a better idea as to why the client is having a difficult time so the case manager can address that issue.

(5) Describe the standards for determining the duration of rental assistance and whether and how the amount of assistance will be adjusted over time; and

The Continuum of Care agrees that any client is eligible to receive assistance up to 12 months in a 3 year period as determined by the certification process required for all ESG clients. All subrecipients are expected to provide support to clients for the full time necessary to stabilize that client and provide for the likelihood of positive housing outcomes after assistance.

(6) Describe the standards for determining the type, amount, and duration of housing stabilization or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive. Limits should include the maximum amount of assistance, maximum number of months a program participant is eligible to receive assistance; and the maximum number of times the program participants may apply for assistance.

Any potential client must go through a detailed intake process in order to determine and document eligibility to participate in the program.

The Continuum of Care agrees that any client is eligible to receive assistance up to 12 months in a 3 year period as determined by the certification process required for all ESG clients. The Continuum of Care anticipates this timeframe to be of assistance, and believes it supports the re-housing emphasis of the program. It is the case manager's responsibility to document client need and ensure that ESG is the most appropriate assistance for this client. All subrecipients are expected to provide support to clients for the full 12 months unless circumstances allow the client to need less assistance. The goal is to stabilize the client and

provide for the likelihood of positive housing outcomes after assistance. Case managers will consistently reevaluate the need for assistance during the 12 month period.

The eligible type of assistance will include:

- Financial Assistance: rental assistance, security & utility deposits, utility payments and motel/hotel vouchers
- Housing Relocation & Stabilization Services: case management, outreach & engagement, and housing search & placement. It is noted by the Continuum that in addition to rent and utility assistance, deposit assistance is most often sought. Further that there is a lack of this specific assistance in the community.

Providing comprehensive case management for housing stability is a crucial part of the program. Case managers should meet regularly with clients in order to, among other things: determine initial and continue eligibility, to develop and implement a housing stability plan, and to monitor the clients progress as being assisted by the program.

Process for Making Sub-Awards

(1) *List your selected program partners and the basis for selecting those partners.*

Partners for implementing ESG will be members of the Continuum of Care. In the instance of the 2011 second allocation of funds, the partners will be The Center for the Homeless, Dismas, and Youth Service Bureau. These organizations are the sub-grantees for HPRP, so were selected as partners for these ESG funds given the decision to utilize the additional funds to provide bridge support as the HPRP program comes to a close.

Homeless Participation Requirement

(1) *Any ESG recipient that cannot meet the participation requirement under 24 CFR 576.405(a) must include a plan that meets the requirements under 24CFR 576.405(b). Describe how the participation requirement has been met.*

The City, along with the Continuum of Care, has as their combined agenda, the development of a long term plan to include homeless participation on the Continuum. All sub-grantees are required to involve program participants in the operation of the ESG funded program. This involvement can be in the form of program participants' employment or volunteering in program activities such as construction, renovation, maintenance, general operation of facilities, or provision of services. For example, a shelter might involve participants in ongoing maintenance tasks or other operations of the facility such as staffing the reception desk. This involvement can include paid and/or volunteer work..

Performance Standards

(1) Describe the performance standards, which were developed with consultation from the COC, for evaluating success of ESG activities.

The City, like HUD, recognizes that performance standards will evolve over the next few years as the ESG Interim Rule is implemented and as ESG subrecipients improve their program outcomes through the evaluation of HMIS data and through integration of ESG services into their local Continuum of Care. This first year of implementation of the Emergency Solutions Grant will allow the City to gain baseline data about specific performance measures and performance standards. Baseline information from FY 2012 will be used to further refine measures and standards for the FY 2013 ESG funds. When developing the performance standards, the City will also consider which data elements were required to be collected in HMIS for ESG, and additional data elements included in the March 2010 HMIS Data Standards. Discussion to date has included standards of housing stability; maintaining income/employment; access to other resource assistance; and the ability of a client to not fall back into a homeless situation. The CoC will continue to be a consulting partner as the ESG performance standards are finalized.

You must attach Table 3C, an SF-424, and signed Certifications for this submission to be complete.

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151 N. Delaware St. Suite 1200, Indianapolis, IN 46204.