NOTICE OF AVAILABILITY
FINAL 2012 ACTION PLAN
AND
AMENDMENTS TO THE FINAL 2012 ACTION PLAN

Notice is hereby given that the St. Joseph County Housing Consortium has available for public review, copies of the final 2012 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, three (3) amendments to the 2012 Action Plan are available for public review:

1) Revised 2012 HOME allocations due to reductions in funding.
2) Revised 2012 CDBG allocations due to reduction in funding.
3) Award process for 2012 Emergency Solutions Grant

There will be a 30 day public comment period on the proposed amendments from April 6, 2012 to May 5, 2012. A public hearing will begin at 5:30 pm, Tuesday, April 24, 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 Monday May 7, 2012 at Noon.

The 2010-2014 HCD Plan, the 2012 Action Plan, and the amendments to the 2012 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 2012 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

SUBSTANTIAL AMENDMENT
HOUSING AND COMMUNITY DEVELOPMENT PLAN 2010-2014
2012 ACTION PLAN

ST. JOSEPH COUNTY HOUSING CONSORTIUM
April 3, 2012

The following three (3) amendments to the 2012 Action Plan are available for public review and further described below:

1) Revised 2012 HOME allocations – see attached chart; revisions noted in color

2) Revised 2012 CDBG allocations – see attached chart; revisions noted in color

3) Process for 2012 Emergency Solutions Funds - see amendment document attached.

A public hearing on these changes will take place Tuesday, April 17, 2012 at 5:30 PM in the Community and Economic Development Offices at 227 W. Jefferson Blvd. 12th floor, South Bend, IN 46601.

CITY OF SOUTH BEND
HOME PROGRAM
PROJECTIONS FOR HC CD 2012 Action Plan
Feb-12

SOURCES

2012 Entitlement amount (assume 38%) decrease	$705,582
2012 American Dream DownPayment Initiative	0
Anticipat ted 201 1 Consortium Program income	176,600
Unprogrammed from previous years	0
Funds to be reprogrammed from prior years	0
Total Sources	**$882,182**

ENTITLEMENT		UNPROGRAMMED	PROGRAM INCOME	REPROGRAMMED	TOTAL AVAILABLE	
South Bend alloc cation(57.50% of entitlement	405,710	0	150,000	0	555,710	South Bend
Mishawaka allocation (17.6% of entitlement)	124,182	0	25,000	0	149,182	Mishawaka
County remainder allocation (9.9%) of entitlement	69,853	0	1,600	0	71,453	County
CHDO set-aside (15% of entitlement)	105,837	0	0	0	105,837	CHDO
	$705,582	$0	$176,600	$0	$882,182	

	FUNDS REQUESTED	INITIAL RECOMMENDATIONS	REDUCTION RECOMMENDATIONS	
SOUTH BEND				
SBHF NE Subsidies	78,750	78,000	78,000	39,200 for each of 2 homes
Habitat for Humanity mortgage subsidies	168,000	42,000	42,000	2 home subsidy
Comm & Econ Development Admin	22,500	22,500	22,500	administrative for C&ED
Oaklawn Center	20,000	20,000	20,000	rental subsidies for 4
HAO S.E Homeowner Rehab	200,000	50,000	40,000	approx. 8 homeowner repairs @$5000 ea.
CHDO/NNN Revitalization	840,000	537,128	459,047	Not< 3 rehab: 353,209.70 +CHDO 15% of 105,837.30
unallocated	0			
South Bend total	**$1,329,250**	**$749,628**	661,547	
MISHAWAKA				
First Time Homebuyer program	234,647	202,375	137,932	2 homes
Consortium admin	11,250	11,250	11,250	administrative for C&ED
		0		
unallocated	0	0		
Mishawaka total	**$245,897**	**$213,625**	149,182	
COUNTY				
HAO Homeowner Rehab	150,000	85,921	60,203	approx. 10 homeowner rehabs at $5000 each
Habitat subsidies	42,000	0	0	
Consortium Admin	11,250	11,250	11,250	administrative for C&ED
unallocated	0	0		
County Total	**$203,250**	**$97,171**	$71,453	
GRAND TOTAL	**$1,778,397**	**$1,060,424**	$882,182	

11-Apr-12

HCD Application Recommendations for Program Year 2012

		St. Joseph County Housing Consortium	**South Bend CDBG**						
			Yr 2012 CDBG Entitlement amount	**$2,267,742**					
			Reprogrammable funds	$416,050					
				$0					
	Admin subject to 20% cap:	**$473,148.40**	Program income	$98,000					
	Public Services subject to 15% cap:	$365,361.30	Total available for yr 2011	**$2,781,792**					
Application #	**Agency**	**Project**	**24 CFR**	**Benefit**	**2011**	**2012**	**2012 INITIAL**	**2012 reduction**	
	South Bend CDBG		**Eligibility**		**Allocation**	**Requests**	**Recommendations**	**Recommendations**	
14	**Department of Community & Economic**	**General Admin C&ED**	**570.205 & 570.206**	**Presumed**	**241,985**	**271,985**	**271,000**	**260,000**	
	Downtown South Bend, Inc.	**Parking Lot Program Income**	**570.206**	**Presumed**	**18,000**	**18,000**	**18,000**	**18,000**	
8	**Near Northwest Neighborhood, Inc**	**NNN Admin**	**570.206**	**Presumed**	**106,400**	**140,000**	**96,800**	**82,000**	
19	**South Bend Heritage Foundation**	**General Admin**	**570.206**	**Presumed**	**$143,600**	**$175,000**	**124,000**	**104000**	**Admin**
24	**South Bend Human Rights Commission**	**Affirmative Fair Housing Activities**	**570.206(c)**	**Presumed**	**10,000**	**10,000**	**10,000**	**10,000**	**$474,000**
1	*Aids Ministries/Aids Assist*	*Comprehensive Hsing Assistance for people with Aids*	*570.201 (e)*	*Low/mod Limited clientele*		*15,000*	*0*		
6	*REAL Services*	*Older Adult Crime Victim Program*	*570.201(e)*	*Low/mod Limited clientele*		*12,000*	*0*		
5	*REAL Services*	*Adult Guardianship Program*	*570.201(e)*	*Low/mod Limited clientele*		*9,000*	*0*		**Public Services**
4	*South Bend Police Department*	*Neighborhood Action Reclamation Patrols // Foot-Bike*	*570.201(e)*	*Low/mod Area Benefit*	*90,000*	*90,000*	*90,000*	*90,000*	**$90,000**
2	Real Services	Caregiver Connection - Aging in Place	570.202(b)(2)	Low/mod Housing	248,000	248,000	150,000	125,000	
13	Community Homebuyers Corporation	Forgivable Second Mortgage	570.201(n)	Low/mod Housing	260,292	275,000	250,000	225,000	
25	Department of Code Enforcement	Vacant & Abandoned Building demolition Program	570.201(a)(d)	elimination of slums/blight			125,000	125,000	
17	Division of Community Development	Activity Delivery costs (includes Housing Counseling)	570.202(b)(9) & 570.201(n)	Low/mod Housing	130,000	100,000	100,985	100,527	
16	Center for the Homeless	Family Dorm Bathroom Renovation	570.201 (c)	Low/mod area benefit		50,000	25,000	25,000	
7	YWCA	Residential Facility Kitchen Improvements	570.201 (c)	Low/mod area benefit		15,000	15,000	15,000	
17	Dismas House	exterior rehab	570.201 (c)	Low/mod Area Benefit		20,000	20,000	20,000	
12	Division of Community Development - H	South Bend Home Improvement Program	570.202(b)(2)	Low/mod Housing	450,000	450,000	425,000	398,000	
15	Housing Development Corporation	REWARD Program	570.201(n)	Low/mod Housing	30,000	35,000	30,000	20,000	
9	Near Northwest Neighborhood, Inc	Program Delivery	570.202(b)(9)	Low/mod Housing	50,000	50,000	46,265	46,265	
10	Near Northwest Neighborhood, Inc	Revitalization Program	570.201(a)(b)(d)(f(i))	Low/mod Housing	300,000	947,588	300,000	275,000	
11	Near northwest Neighborhod,Inc.	Community Space	570.201 (c)	Low.mod Area benefit		250,000	200,000	200,000	
23	NRTSC	Neighborhood Capacity Building	570.201(p)	Low/mod Area Benefit	20,127	21,600	18,000	18,000	
3	Rebuilding Together	Rebuilding Together /River Park	570.202(b)(2)	Low/mod Housing	135,000	150,000	125,000	100,000	
20	South Bend Heritage Foundation	Scattered site rental improvements	570.202 (b) (2)	Low/Mod Housing		405,000	250,000	225,000	
22	South Bend Heritage Foundation	Colfax Cultural Center Bathroom Rehab/ADA	570.201(c)	Low/mod Area Benefit	90,000	75,375	75,000	75,000	
18	Northeast Neighborhood Revitalization C	Property Acq/Demo for Senior Housing	570.201 (a) (d)	Low/Mod Housing		675,000	0	-	
21	South Bend Heritage Foundation/NWS	Near West Side Neighborhood Acquisition & Sub Rehab	570.201(a)(d) & 570.202.(b)(1)	Low/mod Housing	100,000	600,750	250,000	225,000	
									All Others
									$2,217,792
			Total South Bend CDBG		**$2,423,404**	**$5,109,298**	**$3,015,050**	**2,781,792**	**$2,781,792**
						Bal. to allocate		**$0**	

ESG (Emergency Solutions Grant) Substantial Amendment
Program Year 2012

The City of South Bend expects to receive an allocation of FY2012 ESG funds in the amount of $220,990.00.

A substantial amendment is required after any substantial changes in the Annual Action Plan of the Final Housing and Community Development (HCD) Plan are made. Per the current HCD Plan a substantial change 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 a substantial amendment to the St. Joseph County Housing Consortiuum Housing and Community Develoment Plan for 2012.

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

The following are the requirements outlined by HUD that must be included in our FY2012 Substantial Amendment:

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

The SF-424 and Certifications will be included with the final document submission to HUD.

Summary of Consultation Process

The city should include the following in the Substantial Amendment: How did you consult with your Continuum of Care within your geographic area on:

determining how to allocate ESG funds for eligible activities;
developing the performance standards for activities funded under ESG; and
developing funding, policies, and procedures for the operation and administration in HMIS

The City and Continuum discussed and agreed that the ESG funds would be used to assist nonprofit organizations provide assistance to homeless individuals and families by supporting the following:

Broaden existing shelter and homelessness prevention activities.

Emphasize Rapid Re-housing (helping individuals and families who are literally homeless [in a shelter or sleeping in a place not meant for human habitation]) to quickly access permanent housing.

Help people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Align the ESG program with other HUD programs.

Support more coordinated and effective data collection, performance measurement, and program evaluation.

As part of the Continuum's on-going discussion and review of HPRP and the impending shift to ESG, the proposed performance standards are based on the regulations, desired outcomes, and experience with HPRP. The Center for the Homeless has been and continues to be 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 Track for HMIS service. All HMIS users follow confidentiality and privacy requirements.

Summary of Citizen Participation Process

The city should include:

Summarize citizen participation used; summarize the public comments or views received; and summarize the comments or views not accepted and include the reasons for not accepting those comments or views).

The HCD 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 5, 2012, with a public comment period beginning April 6- May 5, 2012. A public hearing was held Tuesday April 24, 2012.

Any comments received will be summarized, addressed and included after the comment period ends

Match

The city should include: types of cash &/or non-cash resources used as match; specific amounts of resources used as match; and proposed uses of match resources).

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 $220,990 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.

Proposed Activities and Overall Budget

Discussion of Funding Priorities: Explain why you chose to fund the proposed activities at the amounts specified (recommended: if available, use locally-relevant data to support the funding priorities, and explain how the funding priorities will support the national priorities established in Opening Doors: Federal Strategic Plan to Prevent and End Homelessness; and

The St. Joseph County HCD Plan states the St. Joseph County Continuum of Care has established and works towards the following objectives: (1) continue to support the work of existing shelters to address those individuals that cannot immediately be assisted; (2) Increase the percentage of homeless persons staying in permanent housing over 6 months; (3) Increase the percentage of homeless persons moving from transitional housing to permanent housing. Towards that end the C of C and the City agreed that the maximum allowed for shelter operations - 60% -of the total available be allocated for the payment of certain operating and social service expenses in connection with emergency shelter for the homeless; The balance is to be split between the admin costs of 5% maximum and the 35% to homeless prevention and rapid re-housing. This proposal was based on the fact that shelter operations funding is a critical need in the community; and the emphasis on rapid re-housing should continue to support the efforts of the HPRP and ESG programs conducted prior. The most recent meeting related to this topic was held March 27, 2012.

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 types 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.

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 also 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:
Include detailed budget of planned activities and funding levels.

FY 2012 Detailed Budget Table

Emergency Solutions Grants

Eligible Activities	**Activity Amount**
Emergency Shelter**	**$132,594.00**
*Renovation***	$0.00
*Operation***	$124,594.00
*Essential Service***	$8000.00
*URA Assistance***	$0.00
Street Outreach - Essential Services**	**$0.00**
HMIS	**$0.00**
Rapid Re-housing	**$51,855.00**
Housing Relocation and Stabilization Services	$20,742.00
Tenant-Based Rental Assistance	$31,113.00
Project-Based Rental Assistance	$0.00
Homelessness Prevention	**$25,541.00**
Housing Relocation and Stabilization Services	$5,108.00
Tenant-Based Rental Assistance	$20,433.00
Project-Based Rental Assistance	$0.00
Administration (5%)	**$11,000.00**
Total Grant Amount:	**$0.00**

Written Standards for Provision of ESG Assistance

The city must include written standards for providing the proposed assistance. These standards must include:

Sstandard 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 are homeless or at risk of homelessness and below 30% AMI. 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 ESG program. 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.

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 other service provider within the 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 sub-grantee is expected to send at least one staff member and share all lessons learned with all housing case management staff. Sub-grantees

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.

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;

Clients will be assisted on a first come first served basis if the individual/families is/are determined to be eligible for assistance (client is homeless or at risk of homelessness and is income eligible [<30% AMI]).

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, 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 - and 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 Work One 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 to fill out a new Income & Rent Calculation worksheet. 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.

Standards for determining how long a particular program participant will be provided with 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 within a 3 year period as determined by the certification process required for all ESG clients. All

sub-grantees 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.

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 nor rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive 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 within 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 sub-grantees 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:

- Street Outreach,
- Emergency Shelter,
- Homelessness Prevention,
- Housing Relocation & Stabilization Services, and
- Rental Assistance.

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, develop and implement a housing stability plan, and monitor the clients progress as being assisted by the program.

Describe Process for Making Sub-awards

The City proposed to the St. Joseph County Continuum of Care to award the 2012 funds through a Request for Proposal/application process. It is projected that this process would begin upon approval of this amendment by HUD.

Homeless Participation Requirement

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

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 sub-grantees improve their program outcomes through the evaluation of HMIS data and through integration of ESG services into their local Continuum of Care. 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.

Performance Measures for Homelessness Prevention

a. A reduction in the number of homeless households involving families with children (a priority need for homeless assistance within the local Continuum of Care community).

b. Expected Outcome: At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance provided under ESG.

Performance Measures for Homeless Rapid Re-Housing

a. A reduction in the number of homeless households involving families with children, both sheltered and unsheltered (a priority need for homeless assistance within the local Continuum of Care community).

b. Expected Outcome: At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance provided under ESG.