

CITY OF GARY, INDIANA
NOTICE OF SUBSTANTIAL AMENDMENT TO THE 2019 ANNUAL ACTION PLAN

The following is a summary and language that amends the City of Gary's 2019 Annual Action Plan.

Background:

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

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

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

However, due to COVID-19 the United States Department of Housing and Urban Development (HUD), in its memorandum of May 4, 2020, has issued guidance that ESG recipients have the immediate ability to omit the citizen participation and consultation requirements for substantial amendments and new consolidated plan submissions for ESG-CV funding. However, each grantee must publish how it has used and will use its allocation, at a minimum, on the Internet at the appropriate Government website or through other electronic media.

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

Proposed Substantial Amendment

The City of Gary is proposing the following amendment to the 2019 Annual Action Plan in order to add the additional Emergency Solutions Grant (ESG-CV2) funding established by the CARES Act.

Analysis

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

- Funds identified in the Consolidated Plan did not previously report, in the plan, additional funding made available by the CARES Act.

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

1. Programming \$1,093,079 in Emergency Solutions Grant (ESG-CV2) funding made available under the CARES Act.

Reprogramming ESG-CV activities

In order to be responsive to the needs of the City of Gary in preparing, preventing, and responding to coronavirus and its impact on people at risk of and experiencing homelessness, the City of Gary will

routinely reevaluate our funding decisions throughout the period of performance. Consistent with the terms of all subrecipient grant agreements or contracts, the City of Gary intends to reprogram ESG-CV funding between selected activities or to include additional ESG-CV activities if/when necessary, based on infection control needs and response efforts related to preventing, preparing and responding to COVID-19.

On page 77, of the approved 2019 Annual Action Plan, add the ESG-CV2 CARES grant project as follows:

57	Project:	ESG-CARES (2019)
	Target Area:	Citywide
	Goals Supported:	HO-1 Operation/Support HO-2 Prevention and Housing HO-3 Housing AM-1 Overall Coordination
	Needs Addressed:	Homeless Priority
	Funding:	ESG-CV2: \$1,093,079
	Description:	The City of Gary will utilize ESGCV2 funds to fund the following ESG activities as needed by the City of Gary to prevent, prepare for, and respond to COVID-19: <ol style="list-style-type: none"> 1. Rapid re-housing 2. Street outreach 3. Emergency shelter 4. Homelessness prevention 5. Homeless Management Information System (HMIS) 6. Administrative expenses 7. Additional activities allowed by HUD policy, guidance and approved waivers.
	Target Date:	06/24/2022
	Estimate the number and type of families that will benefit from the proposed activities:	To be entered once activities are determined
	Location Description:	Citywide (service locations vary)
	Planned Activities:	The City of Gary plans to fund one or more of the following activities. <ol style="list-style-type: none"> 1. Rapid re-housing 2. Street outreach 3. Emergency shelter 4. Homelessness prevention 5. Homeless Management Information System (HMIS) 6. Administrative expenses 7. Additional activities allowed by HUD policy, guidance and approved waivers.

On page 29 of the approved 2019 Annual Action Plan, add the ESG-CV2 CARES Program grant in Section AP-15 Expected Resources:

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

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of Con Plan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources : \$	Total: \$		
ESG-CV2 CARES	public - federal	Rapid re-housing Street outreach Emergency shelter Homelessness prevention Homeless Management Information System (HMIS) Administrative expenses Additional activities allowed by HUD policy, guidance and approved waivers.	1,093,079	0	0	1,093,079	1,093,079	Additional funding was awarded in the stated amount under the COVID-19 CARES Act. ESG-CV2 funding does not require a match; however, funds will be used to prepare for, prevent, or respond to the COVID-19 pandemic issues. HUD Press Release and Award letter dated 06/09/2020.