

LAKE COUNTY
COMMUNITY ECONOMIC DEVELOPMENT
DEPARTMENT

HOME PROGRAM
AMERICAN RESCUE PLAN

ALLOCATION PLAN
MARCH 2023

HOME-ARP Allocation Plan Template with Guidance

Instructions: All guidance in this template, including questions and tables, reflect requirements for the HOME-ARP allocation plan, as described in Notice CPD-21-10: *Requirements of the Use of Funds in the HOME-American Rescue Plan Program*, unless noted as optional. As the requirements highlighted in this template are not exhaustive, please refer to the Notice for a full description of the allocation plan requirements as well as instructions for submitting the plan, the SF-424, SF-424B, SF-424D, and the certifications.

References to “the ARP” mean the HOME-ARP statute at section 3205 of the American Rescue Plan Act of 2021 (P.L. 117-2).

Consultation

In accordance with Section V.A of the Notice (page 13), before developing its HOME-ARP allocation plan, at a minimum, a PJ must consult with:

- CoC(s) serving the jurisdiction’s geographic area,
- homeless service providers,
- domestic violence service providers,
- veterans’ groups,
- public housing agencies (PHAs),
- public agencies that address the needs of the qualifying populations, and
- public or private organizations that address fair housing, civil rights, and the needs of persons with disabilities.

State PJs are not required to consult with every PHA or CoC within the state’s boundaries; however, local PJs must consult with all PHAs (including statewide or regional PHAs) and CoCs serving the jurisdiction.

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

The County provided notice on December 10th, 2021 announcing that the County was allocated HOME-ARP funds. As part of the notice, the County called for public comments from December 20 to January 21, 2022. The notice also provided information for interested applicants and stakeholders for a virtual meeting that took place on December 28, 2021. Eighteen groups expressed interest in applying for funding. The meeting provided information about how HOME-ARP can be used to meet affordable housing needs within the communities of Lake County. The County described the application process for interested parties. Applications were requested to be submitted by January 21, 2022. Throughout the application process, there were a number of calls with agencies to discuss eligibility requirements. The County forwarded additional information to its stakeholders, including HUD guidance on HOME-ARP.

The County held a public hearing on January 21, 2022 to review applications and allow applicants a chance to describe their proposed use of funds. In total, the County received four applications for funding from Hanover Township, Fair Haven, Legacy Foundation, and Catholic Charities. Applications were discussed as part of the January 27th Lake County Redevelopment Commission meeting as well.

The County held an additional meeting with the CoC and the Cities of Hammond, Gary, and East Chicago on March 11 to discuss coordination of a county wide strategy to use available HOME-ARP funds. The County delayed the submission of its HOME-ARP Allocation Plan to ensure coordination with the Cities of Hammond, Gary, and East Chicago as they carried out their consultation and public participation processes. The County's plan was also informed in part through those additional processes.

List the organizations consulted:

Agency/Org Consulted	Type of Agency/Org	Method of Consultation	Feedback
CoC of NWI	Continuum of Care	Virtual meeting; follow ups	HOME ARP should be integrated with overall strategies of CoC. Strategic Plan covering all HOME-ARP grantees in the county should be coordinated.
Northwest Indiana Community Action	Non-profit / Community Action Corporation, local administrator of Public Housing Vouchers, disability service provider	Virtual meeting, follow up	general need for more affordable rental and ways to address it; partnerships and coordination with other programs.
Catholic Charities	Non-profit/faith based group	Virtual meeting	Needs for homeless, affordable rental options
Crisis Center Inc	Non-profit / shelter, DV Service Provider	Virtual Meeting	Needs for DV information
Fair Haven	DV Service Provider	Virtual meeting, Public hearing	Needs for DV, trafficking victims
Legacy Foundation	Community Development Corporation	Virtual meeting, follow up	Was interested in re-using mobile homes for shelter through the program.
Society of St Vincent DePaul	Non-profit	Virtual meeting, follow up	Homeless and housing needs
A Safe Haven	Non-profit, Veterans	Virtual meeting, follow up	Homeless and housing needs

Lake County Indiana HOME ARP Allocation Plan

Mental Health America	Non-profit	Virtual meeting, follow up	Homeless and housing needs; supportive services.
Indiana Plan	Non-profit	Virtual meeting, follow up	Homeless and housing needs; supportive services.
Northwest Indiana Reinvestment Alliance	Nonprofit focused on housing, fair housing, and reinvestment	Virtual meeting, follow up	Homeless and housing needs; counseling.
St Jude House	Non-profit	Virtual meeting, follow up	Homeless and housing needs
Regional Health Systems	Nonprofit / health provider	Virtual meeting, follow up	Homeless and housing needs; supportive services and mental health.
Veterans Administration	Federal Agency, Veterans	(invited)	None.
Veteran's Collection	Non-profit, Veterans	Virtual meeting, follow up	Homeless and housing needs
Lake Area United Way	Nonprofit	Virtual meeting, follow up	Homeless and housing needs; coordination
City of Hammond	Local Municipality	Virtual meeting	Interested in coordinated approach.
City of Gary	Local Municipality	Virtual meeting	Interested in coordinated approach. A new facility for Brother's Keeper is a possible project.
Calumet Township	Local government	Virtual meeting	Housing needs
Cedar Creek Township	Local government	Virtual meeting, follow up	Housing needs
Hanover Township	Local government	Virtual meeting, follow up	Housing needs
St John Township	Local government	Virtual meeting, follow up	Housing needs
Center Township	Local government	Virtual meeting, follow up	Housing needs
City of Hobart	Local Municipality	Virtual meeting	Housing needs
City of East Chicago	Local Municipality	Virtual meeting	Interested in coordinated approach.

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

There was a general consensus from the County's consultation process that the current level of rental housing affordable to low and very low income households was the priority need to be addressed with HOME ARP funding. Given the level of scarcity of affordable rental housing, many service providers are relying on rental assistance as a means to address affordability issues. There is also a high level of need for emergency housing and supportive services to help

transition households from places unfit for human habitation to stable living environments. A brief summary of the consultations is presented below:

- Availability of rental housing affordable and accessible to households earning less than 30% of area median income.
- Availability of family shelters that would include Men, Women, and Children.
- Availability of housing navigator assistance (housing placement) – someone designated to help people find affordable housing. Availability of other supportive and wrap around services housing for mental health clients, childcare assistance, and transportation assistance/availability.
- Case management assistance needed to apply for other mainstream services, including disability, obtaining acceptable identification.
- Bilingual (Spanish) Support Groups for Sexual Assault/Domestic Violence, Legal Aid, Mental Health.
- Some identified preferences among service providers included specifying a preference for chronically homeless, victims of domestic violence, those at risk of homelessness, and families with children.
- Others communicated a preference based on cost burdens, including severe housing costs burdens or other cost burdens related to childcare, transportation, or medical needs.
- Long-term support/case management for mental health and substance abuse. There is a need to maintain contact with
- Additional services, especially housing placement, for adjudicated persons
- Tenants are experiencing dramatic increases in rents during lease renewals. One agency stated cases of rents increasing by hundreds of dollars upon renewal.

Public Participation

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

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

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

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

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

- ***Date(s) of public notice: 12/10/2021***
- ***Public comment period: start date - 12/20/2021 end date - 1/21/2022***
- ***Date(s) of public hearing: 1/21/2022***

Describe the public participation process:

The County provided public notice for the public comment period on December 10th, 2021. The notice was issued in both English and Spanish. The public comment period was held from December 20th, 2021 to January 21st, 2022 and the public hearing was held on January 21st, 2022.

Describe efforts to broaden public participation:

The County followed its adopted Citizen Participation Plan to conduct public participation.

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

The County did not receive any public comments during the public comment period or at the public hearing. The County did receive a significant amount of feedback from local stakeholders and other local government agencies regarding the use of the funds.

Summarize any comments or recommendations not accepted and state the reasons why:

Not applicable. The County did not receive any comments or recommendations.

Needs Assessment and Gaps Analysis

In accordance with Section V.C.1 of the Notice (page 14), a PJ must evaluate the size and demographic composition of **all four** of the qualifying populations within its boundaries and assess the unmet needs of each of those populations. If the PJ does not evaluate the needs of one of the qualifying populations, then the PJ has not completed their Needs Assessment and Gaps Analysis. In addition, a PJ must identify any gaps within its current shelter and housing inventory as well as the service delivery system. A PJ should use current data, including point in time count, housing inventory count, or other data available through CoCs, and consultations with service providers to quantify the individuals and families in the qualifying populations and their need for additional housing, shelter, or services.

OPTIONAL Homeless Needs Inventory and Gap Analysis Table

Homeless													
	Current Inventory					Homeless Population					Gap Analysis		
	Family		Adults Only		Vets	Family HH (at least 1 child)	Adult HH (w/o child)	Vets	Victims of DV	Family		Adults Only	
	# of Beds	# of Units	# of Beds	# of Units	# of Beds					# of Beds	# of Units	# of Beds	# of Units
Emergency Shelter	97	22	161	161	36								
Transitional Housing	#	#	#	#	#								
Permanent Supportive Housing	169	50	233	233	106								
Other Permanent Housing	35	10	9	9	0								
Sheltered Homeless						25	136	59	23				
Unsheltered Homeless						3	48	0	0				
Current Gap										14	42	39	39

Suggested Data Sources: 1. Point in Time Count (PIT); 2. Continuum of Care Housing Inventory Count (HIC); 3. Consultation

OPTIONAL Housing Needs Inventory and Gap Analysis Table

Non-Homeless			
	Current Inventory	Level of Need	Gap Analysis
	# of Units	# of Households	# of Households
Total Rental Units	24,380		
Rental Units Affordable to HH at 30% AMI (At-Risk of Homelessness)	1,340		
Rental Units Affordable to HH at 50% AMI (Other Populations)	1,955		
0%-30% AMI Renter HH w/ 1 or more severe housing problems (At-Risk of Homelessness)		2,200	
30%-50% AMI Renter HH w/ 1 or more severe housing problems (Other Populations)		1,710	
Current Gaps			3,910

Suggested Data Sources: 1. American Community Survey (ACS); 2. Comprehensive Housing Affordability Strategy (CHAS)

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

Homeless as defined in 24 CFR 91.5

The data included in this section comes from the 2022 Point in Time (PiT) Count and a longitudinal study conducted by IHCD. It should be noted that the Point in Time Count information is based on the data for Lake County only. The IHCD data includes information for the Balance of State CoC as a whole, which includes a much larger geography. However, the County feels the statistics are representative of the homeless population in its jurisdiction.

It should also be noted that the County believes the Point in Time Count does not accurately reflect the total unsheltered population. Given the size of the county and limited resources available, it is difficult to obtain an accurate count of unsheltered persons on a single night.

According to the 2022 PiT Count, there was a total of 212 homeless households in Lake County, including 272 persons. Three of every four of the households were sheltered while one fourth were unsheltered.

Of the sheltered population, about one fourth of the persons were under the age of 18. Only twelve percent of the unsheltered population was under the age of 18. Approximately one third of the adults reported having serious mental illness while only thirteen percent reported a substance abuse issue. It should be noted that this data only includes sheltered individuals.

Unsheltered persons most likely have comparable or greater incidence of mental illness and substance abuse.

In households with children, half of the population (32) was White, forty percent (25) were African American, and twenty-seven percent (17) of the population was Hispanic (please note that some persons are included in more than one category).

In households without children, two thirds of the population was male. Seventy percent of this population was African American, twenty-five percent were White, and six percent were Hispanic.

Fifty-nine veterans were included in the PiT count, all of whom were counted as sheltered. All of the veterans were in households without children. Forty percent were considered to be chronically homeless. Seventy percent are African American. Only ten percent of veterans were women.

In terms of prior living situations, about one third of all households entering the system came from a permanent housing situation. About one fourth of households came from living on the street. The remaining 40% came from temporary situations, institutions, and other living situations.

Most of the persons (71%) entering the continuum of care were “first-time” homelessness. Approximately 1 of every 5 persons (18%) served were reported as “continuously homeless”. This is comparable to the 13% identified as chronically homeless. The remainder (10%) were a mix of persons re-entering the system from permanent or temporary housing situations.

The average cumulative days homeless is 114 days. About one third (32%) of persons exit the continuum to permanent housing destinations, such as a rental unit. The average length of time homelessness was comparable for both household types. There was a fairly large distribution amongst length of homelessness for both household types as well. The percentage of households with a length of homelessness less than 30 days was 42% and 37% for adult only and family households, respectively. The percentage of households with a length of homelessness longer than six months was 27 and 16% for adult only and family households, respectively.

Only six percent of homeless persons return to the system after leaving¹. When looking at the data by household type, families with children fair better. Only 26% of “adults only” households exited to permanent destinations compared to 55% for family households.

¹ IHEDA Longitudinal Study for October 2020 through September 2021.

At Risk of Homelessness as defined in 24 CFR 91.5

For the purposes of this program, at risk of homelessness is defined in 24 CFR 91.5 and includes households that (1) have incomes below 30% of the area median income; (2) lack sufficient resources and support networks to avoid becoming homeless; and (3) meet additional conditions such as living in the home of another or exiting as system of care such as foster care, a correctional institution, or health facility.

According to the Census Data in the table above, there are 3,920 rental households living in the County jurisdiction (this includes the entire County except for Hammond, Gary, and East Chicago) earning less than 30% of the area median income. Of those, 2,515 are considered to be cost burdened (paying more than 30% of their income toward housing) and 2,200 are considered to have a severe housing problem (paying more than half of their income for housing).

The overwhelming majority of housing problems experienced by these households is a housing cost burden where more than half of their income. Any disruption to income, including a cut back in the number of hours worked, can threaten the household's ability to pay its rent and lead to eviction and possibly homelessness.

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

For the purposes of this program, this category includes any individual or family who is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking.

According to the Point in Time Count, there were 23 households that reported domestic violence. All of the households were housed in emergency shelter. This represents a doubling of the number reported in 2021. Similar to the overall homeless populations, local advocacy groups believe the actual number of persons suffering from domestic violence to be much higher. According to a local DV service provide, one of every three women and one of every four men are victims of domestic violence. A non-profit providing counseling to DV victims served 314 clients in the last program year.

According to the National Network to End Domestic Violence, difficult economic times with job loss can exacerbate and increase the level of need for domestic violence services. Like most domestic violence agencies across the country, the local DV provider has seen an increased demand for services for domestic violence victims throughout the pandemic. In 2019, the last "normal" year before the pandemic, 4,275 individuals were provided DV services. In 2021, the caseload increased to 6,232 - an increase of over 30 percent.

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

This category includes individuals and families who do not qualify under the other categories but suffer from a high risk of housing instability. This includes formerly homeless individuals and families, severely cost-burdened households earning less than 30% of the area median income, and households that meet the At-Risk of Homelessness definition but have incomes below 50% of the area median income.

This category is similar to the “at-risk of homelessness” above with the main distinction that it includes incomes up to 50% of the area median income. According to the HUD-provided Census data, there are a total of 1,710 renter households earning between 30 and 50% of the area median income who have a severe housing problem, including paying more than half of their income for housing costs.

During the consultations, one service provider suggested that the plan consider households that had other large expenditures relative to income, including child care, transportation, and medical needs. Other service providers suggest that households with past experience with evictions and convictions to be included in populations at greatest risk of housing instability. Given the current high demand for rental units, landlords have multiple applicants for a unit and are unlikely to rent to a household with an eviction or criminal record.

Multiple service providers stated the need for on-going supports for persons receiving rental assistance, especially households dealing with substance abuse and/or mental illness.

Identify and consider the current resources available to assist qualifying populations, including congregate and non-congregate shelter units, supportive services, TBRA, and affordable and permanent supportive rental housing (Optional):

Lake County’s HOME ARP jurisdiction includes the entire county except for the three large municipalities of Hammond, East Chicago, and Gary. When discussing available resources for qualifying populations, however, residents of the County often use the resources found in these three communities. For this reason, the following list includes shelters and non-profit service providers located throughout the County, including Hammond, East Chicago and Gary.

<u>Emergency Shelters</u>	<u>Permanent Supportive Housing</u>
Brother’s Keeper	City of Gary – VASH
City Rescue Mission	Edgewater – Phoenix
Crisis Center, Inc.	Edgewater – SPC
Edgewater	Missionaries of Charity – Sojourner Truth
Haven House	Missionaries of Charity – Village of Hope
Innermission	Porter Starke – South Shore Commons
Rebuilding the Bridge	Preservation Housing – Veterans
Missionaries of Charity	Regional Mental Health – Shelby Apt
St Jude House	Regional Mental Health – SPC
Veterans Life Changing Services	Safe Haven Veterans Housing Project
Fair Haven DV	
<u>Supportive Services</u>	<u>Other Voucher Programs</u>
Township General Assistance	Hammond Housing Choice Voucher (PHA)
Food Banks (multiple)	East Chicago Choice Voucher (PHA)
Health Clinics (multiple)	Gary Choice Voucher (PHA)
	ICHDA Choice Voucher (PHA)
<u>Rapid Re-Housing / Tenant Based Assistance</u>	
CoC – ESG Rehousing	
CoC – Gary Rehousing	
CoC – HUD Rehousing	
Edgewater – ESG CV	
Hammond ESG Rehousing	

Describe the unmet housing and service needs of qualifying populations:

Homeless as defined in 24 CFR 91.5

Overall, the current housing situation in the County is dire for the four categories of qualifying populations. The housing market continues to be adversely affected by on-going housing and employment issues complicated by the COVID pandemic.

The common refrain heard during consultations for this process and other recent community needs assessment is the need for more rental housing that is affordable to households earning less than 50% of the area median income. Meeting this need through the development of additional units would serve each of the four qualifying populations. Below is a summary of the unmet housing and service needs specific to the four qualifying populations.

Sheltered and Unsheltered Homeless Populations

According to the Point in Time Count, most of those reported as homeless were living in shelters and not unsheltered. There were 48 unsheltered adult only households and 3 unsheltered family households. Again, it should be emphasized that these numbers only reflect households included in the Point in Time Count. The PiT is a one-night, birds eye view of the homeless families and individuals and potential needs of the specific populations. It is presumed there is a large number of households that were not found through the Point in Time Count, including those households who do not meet the HUD technical definition of homelessness. According to the local Continuum, an additional 14 family units and 39 units for individuals are needed. The additional units are based on the daily needs identified through the Coordinated Entry process used by the local CoC.

In terms of unmet need for services, feedback received through the consultation process included employment, child care, and reliable transportation. These needs were cited multiple times throughout the consultation process with local advocacy groups. Given the cost of housing in the local market, households looking to leave the shelters and secure affordable housing would need to achieve a stable, living wage job or be supported through some level of rental assistance. Job training, child care, and transportation would support beneficiaries in their efforts to achieve a living wage job. Given the geographic size of the county and lack of sufficient public transit, transportation may be the most crucial need. There have cases where job training was available to beneficiaries but they could not access it due to lack of transportation.

Another pressing need in the current housing market is a case management / housing referral service to connect qualifying populations with available units. A number of re-housing programs have reported that the biggest issue they face is finding available units with landlords willing to participate in the program.

At Risk of Homelessness as defined in 24 CFR 91.5

The chart above identifies 2,200 rental households at or below 30% of income suffer from a severe housing problem. For the purposes of this plan, any household with a housing problem is considered an unmet need and therefore part of the gap between affordable housing supply and demand.

The service needs of those at risk of homeless are not too different than those considered homeless. Securing a living wage job that reduces housing burden and allowing households to save for emergencies is a common need. Reliable transportation options are needed for this population as well. Some beneficiaries who apply for homeless prevention do so because their private vehicle required an expensive repair and they prioritized the car repair over rent payment as without the car they cannot get to work.

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

As noted above, households fleeing from domestic violence are more likely to have work income than the homeless population in general. However, households fleeing from domestic violence often have children under the age of 18 as well, so there is a stronger need for supportive services focused on children, including child care and after school care.

According to one local domestic violence service provider, sexual violence is a pervasive problem. In 2021, the Fair Haven Rape Crisis Center in the County assisted 314 victims and provided almost 5,000 instances of supportive services through a crisis hotline, counseling, judicial advocacy and other services.

In regard to human trafficking, there is a lack of services. One provider felt that DV shelters were at capacity. They estimated that roughly half of human trafficking in Indiana occurs in the northwest region of the state, including Lake County. Safe Coalition for Human Rights (SAFECHR), has seen an increase of Human Trafficking in which the victims require a different setting of sheltered needs that are not met in either general shelter or DV shelters. The victims of Human Trafficking require major supportive services, which must include mental health services, education, job training, and self-sufficiency reinforcement. Human trafficking prey on both adults and children of all ages, backgrounds, and nationalities and is under reported thus need for greater services availability and identified specific shelters for said victims.

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

This population is similar to the at-risk of homelessness except that incomes are below 50% of the area median income. The need is lower than those in the lowest income bracket. A total of 1,710 households in this income category have a severe housing problem, compared to the 2,200 in the lower income bracket. The most obvious difference between the two groups is the income level. This speaks to the importance of being able to secure a living wage job and the need to provide supportive services that help households in this regard.

As discussed above, households that had large expenditures other than housing, including child care, transportation, and medical needs, should be considered at great risk of housing instability. Households with one or more evictions or criminal convictions also face greater housing instability as landlords will be less likely to rent to these households.

This qualifying population also included formerly homeless families who may need additional supports to achieve housing stability. Multiple service providers stated the need for on-going supports for persons receiving rental assistance, especially households dealing with substance abuse and/or mental illness.

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

There are gaps in housing and services for all of the qualifying populations. The biggest need for housing is additional rental housing affordable to households earning less than 50% of area median income. Ideally, this housing would be located close to public transportation or access to employment to lessen the need to rely on car ownership.

A large gap in the current service delivery system is housing placement. There were many reported instances of clients with housing assistance available who could not find housing. Housing placement services is also needed for households with past evictions and criminal records.

Most of the service providers stated a need on-going supportive, wrap-around services to ensure housing stability. These services could be basic services such as budgeting and job training to more specific services to address on-going mental health and substance abuse. The local Continuum of Care believes the current gaps for services to include adequate job training, which leads to livable wages, sufficient and reliable transportation, adequate and affordable childcare, legal services, timely access to SSDI, Medicaid, and Social Security, recovery programs for substance abuse, greater support for those providing services for Youth aging out of Foster Care and services for Human Trafficking victims.

In terms of shelter-based housing, priority needs include operational funding for the shelters as well as sufficient units and beds to meet the needs of families, single adults, and shelters that provide specifically for youth aging of foster care and identified victims of Human

Trafficking. According to the local Continuum, an additional 14 family units and 39 units for individuals are needed. The additional units are based on the daily needs identified through the Coordinated Entry process used by the local CoC.

In consultation with the three largest cities and the local Continuum of Care, coordination of services seems to be a gap in the service delivery system. The geographic size and lack of reliable transportation makes it difficult for service providers throughout the County to coordinate with each other and for beneficiaries to access services that would be otherwise available if not for a lack of transportation. In addition, the lack of a cohesive data system to help communication and coordination is a barrier. In the current market, many service providers have cited the need for more housing referral type services to help clients locate available units with landlords willing to participate in the program.

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

The County will consider past evictions and past criminal records as additional characteristics associated with instability and increased risk of homelessness. This is based on consultations with numerous service providers.

Identify priority needs for qualifying populations:

Homeless Populations

For homeless populations, priority needs include an increase in affordable housing units to help households transition from shelters to stable rental housing and support services to help ease that transition. Rapid re-housing and tenant based rental assistance would help households secure existing rental housing currently in the private market. However, there is currently a high level of demand for all rental units, which makes it very difficult for persons using government assistance without access to their own car to find and secure an available unit. Supportive services related to housing placement, often provided by a “Housing Navigator”, is in great demand throughout the County.

The development of additional housing options, including permanent supportive housing, is also needed to provide long term housing solutions for chronically homeless populations that will need on-going supportive services to remain in stable housing. On-going supportive services specifically designed to assist Youth Aging Out of Foster Care is also a priority need.

At-risk of Homelessness

For extremely-low income households, priority needs include the creation of additional rental units affordable to families with less than 30% of area median income. Ideally, new units will be located in areas of opportunity that provide relatively high levels to employment and/or public transportation. Priorities for supportive services are focused on those that help households secure living wage jobs, including job training, child care, and transportation services.

Victims of Domestic Violence

Providing housing options and supportive services for victims of domestic violence is considered to be a priority for the purposes of this plan. This priority includes ensuring there is adequate shelter space to accommodate persons fleeing from domestic violence as well as financial and service assistance to transfer from a shelter to stable and affordable rental housing.

Other Qualifying Populations

While the need is still high for other qualifying populations, the level of need is higher for those households earning less than 30 percent of the area median income. The County will still consider projects and programs that serve other qualifying populations, but the priority should be placed on serving lower income households.

The County did identify formerly homeless households that may need additional supportive services and households with past evictions and criminal records as households with unmet needs.

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

The County relied on HUD-provided census data sets, such as the Comprehensive Housing Affordability Strategy (CHAS). Other data included those provided by the Continuum of Care as well as Point in Time Count and Housing Inventory information. The County supplemented this information with the required consultations with other government agencies and homeless service providers listed above.

HOME-ARP Activities

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

The County provided notice on December 10th, 2021 announcing that the County was allocated HOME-ARP funds. The notice also provided information for interested applicants and stakeholders for a virtual meeting that took place on December 28, 2021.

Eighteen groups expressed interest in applying for funding. The meeting provided information about how HOME-ARP can be used to meet affordable housing needs within the communities of Lake County. The County described the application process for interested parties. Applications were requested to be submitted by January 21, 2022. Throughout the application process, there were a number of calls with agencies to discuss eligibility requirements. The County forwarded additional information to its stakeholders, including HUD guidance on HOME-ARP.

The County held a public hearing on January 21, 2022 to review applications and allow applicants a chance to describe their proposed use of funds. In total, the County received four applications for funding from Hanover Township, Fair Haven, Legacy Foundation, and Catholic Charities. Applications were discussed as part of the January 27th Lake County Redevelopment Commission meeting as well.

The County has worked closely with the other three local recipients of HOME-ARP funding, namely the City of Gary, the City of Hammond and the City of East Chicago, to coordinate funding requests. The County has set aside \$350,000 for a housing development in Gary. The County will continue to coordinate with each of the cities if the funded project will also be able to serve residents from the County jurisdiction.

Given that the County did not receive sufficient applications in the first round of applications, the County will conduct an additional application round in the coming months.

Describe whether the PJ will administer eligible activities directly:

At this time, the County does not foresee administering any programs directly other than general administration and oversight of the allocation in addition to planning activities.

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

Not applicable. The County did not use HOME-ARP administrative funds to procure a subrecipient or contractor to prepare the HOME-ARP allocation plan. The County did receive limited assistance from a grants management consultant procured before the announcement of HOME-ARP funds. This consultant, Usona Development LLC, will be paid from CDBG General Administration and Planning funds/general funds.

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

Use of HOME-ARP Funding

	Funding Amount	Percent of the Grant	Statutory Limit
Supportive Services	\$ 220,000	10%	
Acquisition and Development of Non-Congregate Shelters	\$1,016,579	46%	
Tenant Based Rental Assistance (TBRA)	\$0	0%	
Development of Affordable Rental Housing	\$ 801,000	36%	
Non-Profit Operating	\$ 0	0 %	5%
Non-Profit Capacity Building	\$ 100,000	5 %	5%
Administration and Planning	\$ 60,000	3 %	15%
Total HOME ARP Allocation	\$ 2,197,579		

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

The County is proposing to provide funding to the following projects:

Supportive Services

To Be Determined	\$100,000
Catholic Charities – Housing Assistance	\$120,000

Non-Congregate Shelter Acquisition/Development

Fair Haven – Non-congregate Shelter	\$750,000
Project to be Determined	\$266,579

Affordable Rental Housing Development

Legacy/SSDC – Housing Assistance Program	\$51,000
City of Gary Development	\$350,000
Project to be Determined	\$400,000

Administration, Planning, and Capacity Building

Administrative/Planning	\$60,000
Nonprofit Capacity Building	\$100,000

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

The funding plan was based on a review of applications submitted to the County in response to a Notice of Funding Availability. Funds that were not allocated were allocated to the acquisition and development of non-congregate shelter and affordable rental housing development based on the information received through the consultation process. The current housing inventory is severely lacking in meeting the needs of low and extremely low income households, especially in locations that have good access to public transportation and jobs.

HOME-ARP Production Housing Goals

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

Supportive Services

Catholic Charities – Housing Assistance 100 households

Non-Congregate Shelter Acquisition/Development

Fair Haven – Non-congregate Shelter 4 units of shelter

Project to be Determined 2 units of shelter

Affordable Rental Housing Development

Project to be Determined 5 housing units

City of Gary Development 20 housing units

Legacy/SSDC – Housing Assistance Program 1 housing unit

Administration and Planning

Administrative/Planning Not applicable

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

The County is proposing to pursue three main goals, including homeless prevention, increasing shelter capacity, and affordable rental housing development.

For Homeless Prevention, the County will partner with Catholic Charities to provide rental housing assistance to households in order to avoid the trauma of homelessness before it occurs. This will help ease the strain on the household and upon the local shelter system.

For non-congregate shelter, the County will provide a subsidy to Fair Haven to create 4 new units of emergency shelter for victims of domestic violence and trafficking. The County expects to fund at least one additional project that will contain 2 additional units.

For Affordable Rental Housing Development, the County will partner with the City of Gary and Legacy Foundation. The Gary project is expected to create 20 units and the Legacy Foundation project will create an additional unit of affordable housing. The County expects to fund an additional 5 units with the balance remaining.

Preferences

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

Please note that HUD has also described a method of prioritization in other HUD guidance. Section I.C.4 of Notice CPD-17-01 describes Prioritization in CoC CE as follows:

“Prioritization. In the context of the coordinated entry process, HUD uses the term “Prioritization” to refer to the coordinated entry-specific process by which all persons in need of assistance who use coordinated entry are ranked in order of priority. The coordinated entry prioritization policies are established by the CoC with input from all community stakeholders and must ensure that ESG projects are able to serve clients in accordance with written standards that are established under 24 CFR 576.400(e). In addition, the coordinated entry process must, to the maximum extent feasible, ensure that people with more severe service needs and levels of vulnerability are prioritized for housing and homeless assistance before those with less severe service needs and lower levels of vulnerability. Regardless of how prioritization decisions are implemented, the prioritization process must follow the requirements in Section II.B.3. and Section I.D. of this Notice.”

If a PJ is using a CE that has a method of prioritization described in CPD-17-01, then a PJ has preferences and a method of prioritizing those preferences. These must be described in the HOME-ARP allocation plan in order to comply with the requirements of Section IV.C.2 (page 10) of the HOME-ARP Notice.

In accordance with Section V.C.4 of the Notice (page 15), the HOME-ARP allocation plan must identify whether the PJ intends to give a preference to one or more qualifying populations or a subpopulation within one or more qualifying populations for any eligible activity or project.

- Preferences cannot violate any applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a).
- The PJ must comply with all applicable nondiscrimination and equal opportunity laws and requirements listed in 24 CFR 5.105(a) and any other applicable fair housing and civil rights laws and requirements when establishing preferences or methods of prioritization.

While PJs are not required to describe specific projects in its HOME-ARP allocation plan to which the preferences will apply, the PJ must describe the planned use of any preferences in its HOME-ARP allocation plan. This requirement also applies if the PJ intends to commit HOME-ARP funds to projects that will utilize preferences or limitations to comply with restrictive eligibility requirements of another project funding source. **If a PJ fails to describe preferences or limitations in its plan, it cannot commit HOME-ARP funds to a project that will implement a preference or limitation until the PJ amends its HOME-ARP allocation plan.**

For HOME-ARP rental housing projects, Section VI.B.20.a.iii of the HOME-ARP Notice (page 36) states that owners may only limit eligibility or give a preference to a particular qualifying population or segment of the qualifying population if the limitation or preference is described in the PJ's HOME-ARP allocation plan. Adding a preference or limitation not previously described in the plan requires a substantial amendment and a public comment period in accordance with Section V.C.6 of the Notice (page 16).

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

In general, the County will not institute a preference to one or more qualifying populations. One of the projects approved for funding, Fair Haven, does focus on serving victims of domestic violence and trafficking and will give preference to victims of domestic violence and trafficking.

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

As mentioned above, Fair Haven will utilize HOME-ARP funding to support the development of a non-congregate shelter that focuses on providing services to victims of domestic violence and human trafficking.

Fair Haven presented compelling evidence for a gap of services and unmet need for domestic violence and trafficking victims. In 2021, the Fair Haven Rape Crisis Center in the County assisted 314 victims and provided almost 5,000 instances of supportive services through a crisis hotline, counseling, judicial advocacy and other services. They estimated that roughly half of human trafficking in Indiana occurs in the northwest region of the state, including Lake County. Safe Coalition for Human Rights (SAFECHR), has seen an increase of Human Trafficking in which the victims require a different setting of sheltered needs that are not met in either general shelter or DV shelters.

Referral Methods

PJs are not required to describe referral methods in the plan. However, if a PJ intends to use a coordinated entry (CE) process for referrals to a HOME-ARP project or activity, the PJ must ensure compliance with Section IV.C.2 of the Notice (page10).

A PJ may use only the CE for direct referrals to HOME-ARP projects and activities (as opposed to CE and other referral agencies or a waitlist) if the CE expands to accept all HOME-ARP qualifying populations and implements the preferences and prioritization established by the PJ in its HOME-ARP allocation plan. A direct referral is where the CE provides the eligible applicant directly to the PJ, subrecipient, or owner to receive HOME-ARP TBRA, supportive services, admittance to a HOME-ARP rental unit, or occupancy of a NCS unit. In comparison, an indirect referral is where a CE (or other referral source) refers an eligible applicant for placement to a project or activity waitlist. Eligible applicants are then selected for a HOME-ARP project or activity from the waitlist.

The PJ must require a project or activity to use CE along with other referral methods (as provided in Section IV.C.2.ii) or to use only a project/activity waiting list (as provided in Section IV.C.2.iii) if:

1. the CE does not have a sufficient number of qualifying individuals and families to refer to the PJ for the project or activity;
2. the CE does not include all HOME-ARP qualifying populations; or,
3. the CE fails to provide access and implement uniform referral processes in situations where a project's geographic area(s) is broader than the geographic area(s) covered by the CE

If a PJ uses a CE that prioritizes one or more qualifying populations or segments of qualifying populations (e.g., prioritizing assistance or units for chronically homeless individuals first, then prioritizing homeless youth second, followed by any other individuals qualifying as homeless, etc.) then this constitutes the use of preferences and a method of prioritization. To implement a CE with these preferences and priorities, the PJ **must** include the preferences and method of prioritization that the CE will use in the preferences section of their HOME-ARP allocation plan. Use of a CE with embedded preferences or methods of prioritization that are not contained in the PJ's HOME-ARP allocation does not comply with Section IV.C.2 of the Notice (page10).

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

The County will require ARP-funded projects to use a waiting list to receive referrals from the local Continuum coordinated entry process and other referral agencies. Applicants will be considered for placement based on the chronological order that they were added to the waiting list.

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

The coordinated entry (CE) process will provide referrals to ARP-funded projects for persons who are homeless or at-risk of homeless. The local CE process is currently evaluating the possibility of including other HOME-ARP qualifying populations, including those at-risk of homelessness and “other populations”. At this time, other qualifying populations will come from other referral agencies and the general public.

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

HOME-ARP funded projects will receive referrals from the CE process. Currently the CE process gives priority to households that receive the highest scores on the intake assessment.

If the PJ intends to use both a CE process established by the CoC and another referral method for a project or activity, describe any method of prioritization between the two referral methods, if any. (Optional):

The County will not provide a preference or prioritization between referral sources.

The County expects that each HOME-ARP-funded project will utilize its own waiting list that will receive referrals from multiple sources, including the CE.

Limitations in a HOME-ARP rental housing or NCS project

Limiting eligibility for a HOME-ARP rental housing or NCS project is only permitted under certain circumstances.

- PJs must follow all applicable fair housing, civil rights, and nondiscrimination requirements, including but not limited to those requirements listed in 24 CFR 5.105(a). This includes, but is not limited to, the Fair Housing Act, Title VI of the Civil Rights Act, section 504 of Rehabilitation Act, HUD’s Equal Access Rule, and the Americans with Disabilities Act, as applicable.
- A PJ may not exclude otherwise eligible qualifying populations from its overall HOME-ARP program.
- Within the qualifying populations, participation in a project or activity may be limited to persons with a specific disability only, if necessary, to provide effective housing, aid, benefit, or services that would be as effective as those provided to others in accordance with 24 CFR 8.4(b)(1)(iv). A PJ must describe why such a limitation for a project or activity is necessary in its HOME-ARP allocation plan (based on the needs and gap identified by the PJ in its plan) to meet some greater need and to provide a specific benefit that cannot be provided through the provision of a preference.
- For HOME-ARP rental housing, section VI.B.20.a.iii of the Notice (page 36) states that owners may only limit eligibility to a particular qualifying population or segment of the

qualifying population if the limitation is described in the PJ's HOME-ARP allocation plan.

- PJs may limit admission to HOME-ARP rental housing or NCS to households who need the specialized supportive services that are provided in such housing or NCS. However, no otherwise eligible individuals with disabilities or families including an individual with a disability who may benefit from the services provided may be excluded on the grounds that they do not have a particular disability.

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

The County proposes to provide funding for the development of non-congregate shelter space to Fair Haven, an organization dedicated to serving victims of domestic violence and trafficking. The County has confirmed with the subrecipient that they will offer services to all of the qualifying HOME-ARP populations. The County does not expect any of the other funded projects to be limited to a particular qualifying population.

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

Not applicable.

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

Not applicable.

HOME-ARP Refinancing Guidelines

If the PJ intends to use HOME-ARP funds to refinance existing debt secured by multifamily rental housing that is being rehabilitated with HOME-ARP funds, the PJ must state its HOME-ARP refinancing guidelines in accordance with 24 CFR 92.206(b). The guidelines must describe the conditions under which the PJ will refinance existing debt for a HOME-ARP rental project, including:

- ***Establish a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing to demonstrate that rehabilitation of HOME-ARP rental housing is the primary eligible activity***
Not applicable. The County will not use HOME-ARP funds for refinancing.
- ***Require a review of management practices to demonstrate that disinvestment in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving qualified populations for the minimum compliance period can be demonstrated.***
Not applicable. The County will not use HOME-ARP funds for refinancing.
- ***State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.***
Not applicable. The County will not use HOME-ARP funds for refinancing.
- ***Specify the required compliance period, whether it is the minimum 15 years or longer.***
Not applicable. The County will not use HOME-ARP funds for refinancing.
- ***State that HOME-ARP funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.***
Not applicable. The County will not use HOME-ARP funds for refinancing.
- ***Other requirements in the PJ's guidelines, if applicable:***
Not applicable. The County will not use HOME-ARP funds for refinancing.