

DRAFT

Substantial Amendment to the Consolidated Plan 2011 Annual Action Plan for Housing and Community Development for the City of Rochester Second Allocation Emergency Solutions Grants (ESG) Program Funds

On December 5, 2011, the Department of Housing and Urban Development (HUD) published the Interim Rule for the Emergency Solutions Grants (ESG) program and Consolidated Plan amendments. This rule became effective on January 4, 2012; enabling ESG recipients to receive a second allocation of 2011 ESG funds to carry out new homeless assistance activities. The City of Rochester anticipates receiving an allocation of \$237,918, which will be used for the eligible activities of homelessness prevention and rapid re-housing. To receive this second allocation of ESG funds, the City must submit a Substantial Amendment to the 2011 Annual Action Plan to HUD by May 15, 2012, following a 30-day public comment period. The public comment period will begin March 24, 2012 and the City will accept comments through April 24, 2012. A public hearing will be held on April 24, 2012 at 7:30 p.m. at City Hall, City Council Chambers, 30 Church Street.

1. Summary of Consultation Process

Consultation with Continuum of Care

The Rochester/Monroe County Homeless Continuum of Care Team (CoC) is the lead entity for the Continuum of Care planning and management process, including direct oversight of the implementation of the CoC's Homeless Management Information System (HMIS), project monitoring and establishment of project priorities. The CoC Action Plan provides a framework enabling the community to address homelessness and its underlying causes and to develop a comprehensive, coordinated system of homeless services to help individuals and families achieve independence. It describes a system that ranges from emergency housing and supportive services to permanent housing with homeless prevention and supportive services needed by homeless individuals and families to achieve independent living. Continuum services and housing alternatives include outreach, supportive services, emergency shelters, transitional housing and permanent supportive housing. The system's goal is to appropriately transition individuals from homelessness to their maximum level of self-sufficiency.

The Team is comprised of five Sponsors and Community-Based Planning Participant Organizations/Individuals. The Monroe County Sponsor has designated representatives from the Departments of Planning & Development, Human Services (MCDHS), Office of Mental Health, and the Rochester/Monroe County Youth Bureau. The City of Rochester Sponsor has designated representatives from the City of Rochester Bureau of Business and Housing Development. The Homeless Services Network (HSN) Sponsor (a consortium of more than 50 homeless service providers) elects two representatives; and both the United Way of Greater Rochester and Rochester Housing Authority Sponsors have a designated representative.

The CoC Team has 10 ex-officio members appointed by public and private organizations deemed necessary to develop, maintain, monitor and continuously improve a comprehensive, coordinated and flexible system of homeless housing and support services. They represent the County, City, United Way, Rochester Housing Authority, HSN and three community-based planning participants, who are formerly homeless individuals. In addition, there are elected general members from both public and private groups from the community, i.e. business sector, faith-based organizations, veterans organizations, schools, advocacy groups, etc. This diverse team is the primary planning and coordinating body for homeless housing and services in this community.

The Rochester/Monroe County CoC has been a long-time participant in the ESG planning process for Monroe County and the City of Rochester. ESG community priorities and planning have been discussed at both CoC Team and HSN meetings. Monroe County and City of Rochester housing staff have also consulted extensively with the CoC relative to the preparation of their respective 2011 ESG Substantial Amendments.

ESG funding continues to be a critical issue for local homeless service providers. Facilitated discussions of ESG community priorities are held at the HSN meetings, and CoC members and community stakeholders are strongly encouraged to participate. In addition, CoC members have participated in community discussions led by consultants Dennis Culhane and Suzanne Wagner, who are engaging stakeholders in implementing plans to 1) reduce the number of homeless families referred to hotel/motels for shelter without on-site supportive services; and 2) develop Single Point of Assessment and Access systems for homeless services.

The CoC, members of HSN (a collaboration of local homeless services legal, primary care, mental health, substance abuse, re-entry providers and community stakeholders) and housing staff from the County and City are also collectively participating in planning for the allocation of 2012-2013 ESG funding. Funding allocations will be based on identified priorities, and a RFP process will be utilized by Monroe County to solicit applications for 2012 ESG allocations.

The CoC is participating in the HUD CoC Check-Up self-evaluation designed to assist continuums in determining their current capacity, performance and readiness for the HEARTH Act. Survey respondents, including ESG funding recipients, were asked to rate the CoC on four domains: governance and structure; planning and process; infrastructure and administrative capacity, and housing and services. The CoC will submit a written Action Plan to HUD making it eligible for future technical assistance. Results of the Check-Up process are expected to enhance the ability of the CoC to be a leader in the efforts to coordinate ESG funded services, respond to HEARTH rulings and end homelessness in the Rochester/Monroe County community.

Allocation of ESG Funds

Prior to its inception in 2009, plans for the joint Rochester/Monroe County Homelessness Prevention and Rapid Re-Housing Program (HPRP), known as Heading Home, were developed by a consortium of homeless service providers and community stakeholders, including members of the CoC, who responded to a collaborative Request for Proposals (RFP) from the City and County. The Heading Home proposal submitted by Coordinated Care Services, Inc. (CCSI) was selected by this consortium. Six (6) members of the Heading Home Oversight Committee are also members of the CoC, which helps ensure consistency and guidance in program development and administration.

Heading Home program goals and outcomes are aligned with the community's plans to end homelessness. From November 2009 to mid-February 2012, Heading Home has served 2,749 households. In addition to case management (Stabilization and Relocation) and coordination with community providers, Heading Home provided \$2,328,460 in financial assistance (\$2,056,494 in prevention; \$271,966 in rapid re-housing). Heading Home data is entered into HMIS, and is closely monitored by the CoC. HMIS is a software application used to collect demographic information on people served. The purpose of HMIS is to record and store client-level information about the numbers, characteristics and needs of persons who use homeless housing and supportive services and about persons who receive assistance for "persons at risk of homelessness" over time; to produce an unduplicated count of homeless persons for each Continuum of Care; to understand the extent and nature of homelessness locally, regionally and nationally; and to understand patterns of service use and measure the effectiveness of programs. Heading Home program results and HMIS data will be utilized to determine all future programming and funding decisions in the Rochester/Monroe County community.

With the impending closeout of the City and County HPRP grants, the ramping down of Heading Home began in January 2012, and it is anticipated that all HPRP Heading Home funds will be fully expended by the end of June 2012. The community has formed a HEARTH Act Implementation Committee to explore sustainability of Heading Home after HPRP funds have been exhausted. The City and County staff have met extensively with the CoC Coordinator, Chair, and Co-Chair and CCSI to facilitate the proposed use of the 2011 Second Allocation ESG funding to continue Heading Home on a limited basis geared to funds available.

Through the end of February 2012, Heading Home served a total of 2,749 households, comprised of 5,995 persons, with prevention (2,423 households) and rapid re-housing (326 households) services. Of these households served, 90% remained stably housed at three months; 85% at six months; 82% after nine months; and 78% were stably housed after 12 months. During the period January through September 2011, no (zero) Heading Home participants who received prevention services appeared on HMIS as receiving homeless shelter services.

Due to the success of Heading Home in preventing homelessness and rapidly re-housing homeless persons and families, continuation of services is considered a priority. The County and City propose to jointly administer their 2011 ESG Second Allocation funding to continue Heading Home services on a limited basis until 2012 funding can be secured. To ensure continuity and provision of Heading Home services without interruption, it is proposed that CCSI will remain the lead agency, as they are with the current HPRP funded program, and The Housing Council in the Monroe County Area, Inc. will continue to provide program services and referrals.

Although HUD strongly recommends the use of ESG funding for rapid re-housing, the focus of the City/County 2011 ESG Second Allocation will be both homelessness prevention and rapid re-housing. Rapid re-housing will assist people to transition out of the homeless assistance system as soon as possible in order to reduce the number of homeless persons in the community.

The current HPRP funded City/County Heading Home Program's service activity mirrors the findings of HPRP on the national level. In developing the HPRP program, HUD anticipated that the persons receiving each type of assistance would be split evenly. However, data reported by CCSI in the June 2011 publication "*2010 Homelessness Prevention and Rapid Re-Housing Program: Year 1 Summary*" indicated that, of the persons served in the first year, approximately 78.2% received homelessness prevention assistance and 24.2% received rapid re-housing assistance. An estimated 2.4% of persons received both types of assistance. To date, 80% of the services provided by the City/County HPRP Heading Home program were homelessness prevention and 20% of services were rapid re-housing provided to persons in emergency shelters who were not receiving financial support from the Monroe County Department of Human Services (DHS). The DHS, under NYS Office of Temporary and Disability Assistance (OTDA) regulations, provides assistance to homeless families and individuals that meet their program requirements. Due to this demonstrated need for prevention services, the City and County submitted an amendment to their HPRP Substantial Amendments to HUD in September 2010 revising the program allocations to reflect actual need.

Performance Standards

City of Rochester and Monroe County utilize the Integrated Disbursement and Information System (IDIS) to document program progress and monitor program performance on an ongoing basis. The Heading Home Program submits data to HMIS as required by HUD. It is anticipated that the CoC will begin participation in the HUD PULSE system, which provides point-in-time shelter counts of homeless persons on a quarterly basis, in the 4th quarter of 2012.

Consolidated Annual Performance and Evaluation Reports (CAPERs) are prepared annually by the County and the City, which contain a summary of resources and programmatic accomplishments, the status of actions taken to implement the strategies contained in the Consolidated Plans, and evaluation of progress made during the year in addressing identified priority needs and objectives. Current program guidelines and appropriate underwriting analysis and documentation are also maintained.

Performance Standards are in alignment with the new measures implemented with the HEARTH Act including:

- reducing the duration of homelessness
- reducing recidivism
- reducing the number of people who become homeless
- increasing employment and income
- ending homelessness

Funding Policies and Procedures for Operation and Administration

Funding policies and procedures for expenditure of 2011 ESG Second Allocation funds have been developed in accordance with the ESG Interim Rule. Funds will be expended within 24 months after the date HUD signs the Substantial Amendment to the City's 2011 Grant Agreement. The Interim Rule increases the community's capacity to engage in strategic planning and program oversight through an increase in administrative allowances. The Interim Rule also shifts the focus of activities from emergency shelter to rapid re-housing by capping the amount of ESG funding that can be used for street outreach and shelter to 60% of the total ESG grant. Monroe County and the City of Rochester intend to budget the entirety of their 2011 ESG Second Allocations to rapid re-housing, homelessness prevention and administration. There will be no allocations for homeless assistance activities beyond those currently budgeted in the initial 2011 ESG allocations.

2. Summary of Citizen Participation Process

The City of Rochester followed its existing Citizen Participation Plan as outlined in the 2010-2015 Strategic Plan, as it applies to Amendments. A public notice regarding the 2011 Second Allocation ESG funds appeared as a Legal Notice in the Democrat and Chronicle on March 24, 2012. A public hearing was held on April 24th at the Rochester City Council meeting held at City Hall, City Council Chambers, 30 Church Street, Rochester, New York 14614 to obtain public comments and input on the Substantial Amendment to the Consolidated Plan 2011 Action Plan.

The Substantial Amendment has been made available during the 30-day public comment period from March 24, 2012 to April 24, 2012 on the City of Rochester's website at <http://www.cityofrochester.gov>. Copies of this document are available for review at the April 24, 2012 public hearing and at the Department of Neighborhood and Business Development, City Hall, 30 Church Street, Rochester, NY 14614.

The public was also encouraged to provide comments at the annual Consolidated Community Development Plan meeting on March 19, 2012, City Council Chambers, 30 Church Street, Rochester, New York 14614. Also, special informational meetings have been held with key community stakeholders, including the Rochester/Monroe County Homeless Continuum of Care (CoC) and the Homeless Services Network (HSN); a network consisting of more than 50 organizations providing housing and/or services for the homeless.

Public Comments Received

TBD

Public Comments Not Accepted

N/A

3. Match Requirements

According to the ESG Interim Rule, recipients must match their 2011 ESG Second Allocation with an equal amount of other federal, state and local resources (cash and non-cash.) City of Rochester and the County of Monroe propose to work collaboratively to allocate their 2011 ESG Second Allocation funds to the continuation of the Heading Home Program, which allocations total \$285,322 (Rochester \$237,918, Monroe County \$47,404.) Eligible match for the overall program has been identified and will be applied to each jurisdiction proportionally.

Below are the identified sources, uses and amounts of match resources for Monroe County's 2011 ESG Second Allocation of \$237,918.

Match Source	Description/Use	Amount Applied to City of Rochester ESG Allocation
City of Rochester HOPWA	Short Term Rental Mortgage Utility (STRMU) funds allocated for financial assistance and case management services for individuals and families at risk of homelessness	\$79,213
City of Rochester CDBG - Eviction Prevention Legal Services	Funding for staff providing eviction prevention and legal services to Heading Home clients	37,524
City of Rochester CDBG - Tenant Education Services	Funding for tenant education services for those about to be sanctioned and lacking resources to secure housing	10,840
Monroe County CDBG – Expanding Housing Opportunities Program	Funding for counseling and referral services provided by the Housing Council relative to fair housing and landlord/tenant dispute resolution	22,931
The Housing Council	Homeless prevention and rapid re-housing services and support not covered by direct Heading Home funding such as the rental registry, landlord search, FHIP outreach and advisory and administrative staff support	58,683
Coordinated Care Services, Inc. (CCSI)	Administrative management of the Heading Home Program not covered by ESG	2,032
Rochester/Monroe County Continuum of Care	HMIS – CoC has contributed a total of 14 HMIS licenses and HMIS operating costs to facilitate Heading Home data entry and reporting	4,786
Monroe County Legal Aid Center	Funding that supports salaries for an attorney and paralegal at .25 FTE to provide services to Heading Home clients such as eviction prevention and benefits assistance	20,846

Monroe County Dept. of Human Services Office of Mental Health	Staff support (@ 4 hrs./mo.) for CoC co-chair assisting with planning and oversight of Heading Home Program	1,059
TOTAL		\$ 237,914

4. Proposed Activities and Overall Budget

Proposed Activities

Since November 2009, the City and County have jointly administered the HPRP Heading Home program. Heading Home offers a comprehensive system to provide rental assistance to individuals and families facing eviction and those who are homeless and without other resources. Supports and activities provided by Heading Home will be continued with 2011 ESG Second Allocation support. They include:

Homelessness Prevention:

- short term rental financial assistance (up to three months)
- medium term rental financial assistance (up to 18 months, but only in extraordinary circumstances)
- security deposits
- utility deposits and payments
- moving costs

Rapid re-housing - housing relocation and stabilization services including:

- outreach and engagement
- housing search and placement
- case management
- coordination with community providers for services including legal services, credit repair, etc.

Based on Heading Home's actual service delivery history, 2011 ESG Second Allocation continuation funding will provide both prevention and rapid re-housing services listed above. The goal will be to provide both services in equal proportion (i.e. 50% of services will be prevention; 50% will be rapid re-housing).

Corresponding Priority Needs from Recipients Annual Action Plan

The City of Rochester Annual Action Plan for 2012-2013 and the Second Program Year Action Plan identify the following needs:

- Decent housing
- Suitable living environments
- Expanded economic opportunities

In addition, priority non-housing community development needs were identified in the Plan. These include: public infrastructure and facility improvements; and public service activities. Below is a chart that outlines the objectives within the identified needs:

Objective Category Decent Housing <i>Which includes:</i>	Objective Category: Suitable Living Environment <i>Which includes:</i>	Objective Category: Expanded Economic Opportunities <i>Which includes:</i>
<i>assisting homeless persons obtain affordable housing</i>	<i>improving the safety and livability of neighborhoods</i>	<i>job creation and retention</i>
<i>assisting persons at risk of becoming homeless</i>	<i>eliminating blighting influences and the deterioration of property and facilities</i>	<i>establishment, stabilization and expansion of small business (including micro-businesses)</i>
<i>retaining the affordable housing stock</i>	<i>increasing the access to quality public and private facilities</i>	<i>the provision of public services concerned with employment</i>
<i>increasing the availability of affordable permanent housing in standard condition to low-income and moderate-income families, particularly to members of disadvantaged minorities without discrimination on the basis of race, color, religion, sex, national origin, familial status, or disability</i>	<i>reducing the isolation of income groups within areas through spatial deconcentration of housing opportunities for lower income persons and the revitalization of deteriorating neighborhoods</i>	<i>the provision of jobs to low-income persons living in areas affected by those programs and activities under programs covered by the plan</i>
<i>increasing the supply of supportive housing which includes structural features and services to enable persons with special needs (including persons with HIV/ADOS) to live in dignity and independence</i>	<i>restoring and preserving properties of special historic, architectural, or aesthetic value</i>	<i>availability of mortgage financing for low income persons at reasonable rates using non-discriminatory lending practices</i>
<i>providing affordable housing that is accessible to job opportunities</i>	<i>conserving energy resources and use of renewable energy sources</i>	<i>access to capital and credit for development activities that promote the long-term economic social viability of the community</i>

Concise Description of The Activities, Including the Number and Types of Persons To Be Served

Program activity will include homelessness prevention assistance to households who would otherwise become homeless and assistance to rapidly re-house persons who are homeless. Program activity will be focused on housing stabilization, providing the temporary financial assistance and other support services needed to help individuals achieve housing stability. It is intended to serve persons who: a) are homeless or would be homeless but for this assistance; and b) can remain stably housed after the time-limited assistance ends.

Program activities will include providing assistance in two categories:

- Prevention: Short term financial assistance to avoid becoming homeless or to move to other housing
- Rapid re-housing: Short term assistance to secure housing for participants who are literally homeless or residing in emergency or transitional housing

Assistance will include:

- Short Term Rental Assistance (3 months or less)
- Medium Term Rental Assistance (18 months or less and only in extraordinary circumstances)
- Security Deposit Payments
- Rental Arrears Payments
- Utility Payments
- Moving Cost Assistance
- Storage Fees

The total City and County ESG Heading Home program expects to provide these services to 200 families and 50 single individuals for a total of 250 participants served. Therefore, the ESG Heading Home Program participants attributed to the City's 2011 ESG Second Allocation are 166 families and 42 single individuals for a total of 218. Program participant households will all have incomes at or below 30% of the Area Median Income (AMI).

Corresponding Standard Objectives and Outcome Categories

For all proposed ESG Heading Home Program activities the corresponding objective category is the provision of decent housing with the outcome categories of increasing the availability/accessibility, affordability and sustainability of housing for program participants.

Start and Completion Dates

All 2011 ESG Heading Home Program activities will begin on July 1, 2012 and funds are expected to be fully expended by December 31, 2012.

ESG and Other Funding Amounts

The total City/County 2011 ESG Second Allocation is shown below.

	2nd Allocation 2011-2012	Admin*	Amount to Heading Home
City	\$237,918	\$28,418	\$209,500
County	47,404	5,661	\$41,743
Total	\$285,322	\$34,079	\$251,243

*Admin based on 7.5% of total 2011-2012 ESG Allocations less amounts already budgeted for first allocation (\$21,148 for City and \$4,214 County)

See Page 6 for the sources and uses of program match that have been identified as other cash and non-cash resources that will be available to participants of the ESG Heading Home Program.

Performance Indicators

A total of 250 households will receive financial assistance and housing stabilization services to prevent homelessness and provide rapid re-housing services through the joint City/County ESG Heading Home Program. Of these, it is expected that fifty percent (50%) will receive homelessness prevention services and fifty percent (50%) will receive rapid re-Housing services.

- 125 persons or households will be prevented from becoming homeless
- 125 persons or persons will be assisted from shelters/streets into permanent housing

Evidence from the current City/County HPRP Heading Home Program indicates that the need for prevention services far outstrips the requests for rapid re-housing. Requests for prevention services in this area currently make up eighty-four percent (84%) of all program activity.

Projected Accomplishments

Based on the current HPRP Heading Home Program experience and the requirements set out in the ESG Interim Rule, the following accomplishment goals have been identified:

- Increase the range of housing options and related services for program participants
- Increase knowledge of rights and responsibilities through Tenant Education for 70% of program participants
- Increase the number of program participants stably housed at 12 months to 75%
- Reduce participant transiency by providing opportunities for safe and affordable housing
- Reduce the number of participants who have received prevention services from re-entering local shelter programs to 20% or less
- Prevent rapid re-housing participants from re-entering shelters

Funding Priorities

As recognized in the current City/County HPRP Heading Home's *"2010 Homelessness Prevention and Rapid Re-Housing Program: Year 1 Summary,"* the anticipation was that the persons receiving each type of assistance would be split evenly. Data in the APRs, however, indicated that of the persons served in the first year, approximately 78.2% received homelessness prevention assistance and 24.2% received rapid re-housing assistance.

This has also been the experience of the local community through the efforts of the HPRP Heading Home Program. The call for homelessness prevention dollars far exceeded the requests for Rapid-Re-Housing assistance.

However, funding priorities identified in the ESG Interim Rule will promote the increased use of program funds to facilitate rapid re-housing. Therefore, program funds supporting both activities have been split evenly between rapid re-housing and homelessness prevention. In order to reach the population in need of rapid re-housing services and supports, the Heading Home staff will pursue the following strategies: out-station staff at each of the homeless shelters on a rotating schedule to ensure that shelter staff and clients are aware of Heading Home services; distribute applications; conduct eligibility interviews and provide housing relocation services at these sites. In addition, staff will attend all HSN meetings and any other relevant gatherings to ensure that all in the community who are working with the homeless are aware of Heading Home services.

Detailed Budget

FY 2011 Detailed Budget Table					
First Allocation		FY 2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations			
Second Allocation					
Grant Amount					
Total Administration	\$0.00				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$0.00	\$0.00		\$0.00
	Rehab/Conversion				\$0.00
	Operations				\$0.00
	Essential Services				\$0.00
	Homelessness Prevention				\$0.00
	Administration				\$0.00
	Emergency Shelter Grants Subtotal	\$0.00	\$0.00		\$0.00
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	Renovation**			\$0.00	\$0.00
	Operation**			\$0.00	\$0.00
	Essential Service**			\$0.00	\$0.00
	URA Assistance**			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS				\$0.00
	Rapid Re-housing		\$0.00	\$125,229.46	\$125,229.46
	Housing Relocation and Stabilization Services			\$53,585.46	\$53,585.46
	Tenant-Based Rental Assistance			\$71,644.00	\$71,644.00
	Project-Based Rental Assistance				\$0.00
	Homelessness Prevention		\$0.00	\$125,229.46	\$125,229.46
	Housing Relocation and Stabilization Services			\$53,585.46	\$53,585.46
	Tenant-Based Rental Assistance			\$71,644.00	\$71,644.00
	Project-Based Rental Assistance				\$0.00
	Administration				\$0.00
	Emergency Solutions Grants Subtotal		\$0.00	\$250,458.92	\$250,458.92
			Total Grant Amount:		\$250,458.92

** Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities (see Section III.B. of this Notice).

5. Written Standards for Provision of Assistance

Policies and Procedures for Evaluating Those Eligible for Assistance

Each household will receive an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed;

- The household's total income must be at or below 30 percent of Area Median Income (AMI);
- The household must be either homeless (to receive rapid re-housing assistance) OR at risk of losing its housing (to receive homelessness prevention assistance); AND must meet the following circumstances:
- No appropriate subsequent housing options have been identified;
- The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
- The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

Documentation requirements:

- Verification/proof of income
- SSN for head of household
- Verification of address/current living situation
- Verification of household size
- Some documentation of the problem(s) that led to the need for assistance as determined by the case manager (i.e.; proof of medical bills, loss of income, etc.)

Standards for the Heading Home program have been developed in accordance with "Eligibility Determination and Documentation Guidance - Homeless Prevention and Rapid Re-Housing Program (HPRP), HUD, revised March 17, 2010." These standards include:

- Eligibility requirements: Initial consultation/assessment and determination of income and housing status; access to alternative housing options
- Documentation: written or oral third party verification; applicant self-declaration

Performance Standards for Heading Home eligibility are as follows:

- Initial Consultation and Eligibility Determination: each applicant household must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed
- Income: the household total income must be at or below 30% of Area Median Income (AMI)
- Housing Status: the household must be either literally homeless or at risk of losing housing within 14 days AND must meet the following circumstances: no appropriate subsequent housing options have been identified; the household lacks the financial resources to obtain immediate housing or remain in its existing housing, and the household lacks support networks needed to obtain immediate housing or remain in existing housing

Performance Standards for Documentation are as follows:

- Housing status: written verification of sleeping in a shelter, sleeping in a place not meant for human habitation, being a patient in a hospital or other institution, being a participant in a transitional housing program, being a victim of domestic violence
- Homelessness prevention eligibility: written verification of potential loss of housing due to non-payment of rent and/or other lease violations, utility non-payment, non-payment of hotel/motel charges, foreclosure on rental or owner-occupied property, eviction of host family/friends, uninhabitable conditions, or discharge from an institution
- Housing options/resources: written documentation must be provided for other subsequent housing options, financial resources (e.g. wages and salary, self-employment/business, interest/dividend, pension/retirement, unemployment/disability, TANF/public assistance, alimony/child support/foster care, armed forces income) and support networks

Policies and Procedures for Coordination Among Providers

Staff meetings will be held on a monthly basis to discuss program logistics and processes. Periodically, meetings of all participating agencies will be held to ensure effective ongoing management and provide updates on any new program developments, including HUD regulation updates.

Meetings with the City of Rochester and Monroe County will take place on a monthly basis. These sessions are intended to provide an update on project status, outcomes to date, and to allow for discussion and resolution of any project issues.

Additionally, case managers will be meeting clients weekly in community-based organizations (CBO), as well as in shelters. CBO and shelter staff will be routinely engaged in conversations and will be requested to participate in any process to assist the program in meeting the needs of the people and families it serves.

Policies and Procedures for Determining and Prioritizing Type of Assistance

Below are detailed the procedures for determining and prioritizing eligible families and individuals by the type of assistance requested.

Prevention High Priority Risk Factors

- Eviction within two weeks
- Sudden and significant loss of income
- Sudden and significant increase in utility costs
- Severe housing cost burden (greater than 50% of income)
- High overcrowding
- Recent traumatic life event (loss of spouse, or recent health crisis)
- Significant medical debt

Rapid Re-Housing High Priority Risk Factors:

- Sleeping in an emergency shelter
- Sleeping on the streets, etc.
- Graduating from a transitional shelter
- Victim of domestic violence

Standards for Determining Share of Rent and Utilities Each Participant Must Pay

Under the ESG Heading Home Program, participants will not be required to contribute toward payments provided by the program. Counseling and case management services will focus on maintaining stable housing after program financial assistance ends.

Standards for Determining How Long Rent Assistance and How Amount is Adjusted Over Time

To avoid excessive funding of individual households, which will limit the number of households that can be served by the program; and in order to respond to the variety of circumstances that may create or threaten homelessness, and with a strong emphasis on serving those most in need of assistance, it has been determined that this program would benefit most from limiting the services provided to one-time only.

Current HPRP Heading Home Program funds do not support the long-term maintenance of any person or family. It will be the procedure of the ESG Heading Home Program to provide short-term assistance for these individuals and families to help them obtain/maintain housing until a longer-term or even permanent subsidy becomes available.

Total benefit amounts will be made on a case-by-case basis.

However:

- Payments cannot duplicate other subsidy programs
- All other sources of assistance in the community must be exhausted
- Potential DHS recipients will be referred there prior to acceptance in the program

Standards for Determining Type, Amount and Duration of Stabilization and/or Relocation Assistance

The types of assistance provided will be determined on a case-by-case basis by the case manager with consultation with the program manager under the guidance of the director of finance and will reflect program dollars available, number of clients served to date, and will recognize the established program end date.

Specific guidance and details are offered below by type of assistance:

- Rental Assistance: amount of rent assistance cannot exceed the actual amount of rent and must comply with the HUD rent reasonableness and affordability standards
- Short term rental assistance: cannot exceed 3 months
- Medium term rental assistance: cannot exceed 18 months and must be reviewed every three months. This option will be used in extraordinary circumstances only
- Security Deposits: cannot exceed rent reasonableness standards as established by HUD

- Rental Arrears: cannot exceed rent reasonableness standards.
- Utility Payments: will follow local DHS/HEAP guidelines
- Moving cost Assistance: will be reviewed on a case-by-case basis - A local moving company partnership has been established and estimates are provided prior to move
- Storage Fees: maximum of 3 months

6. Process for Making Sub-Awards

The decision to use 2011 ESG Second Allocation to provide continued funding for Heading Home is based on community need and the success of the current HPRP Heading Home Program. To ensure continuity and provision of Heading Home services without interruption, the City and County propose to retain CCSI as the lead agency based on their response to the joint RFP that they responded to when the HPRP Heading Home program was created. There will be no other sub-awards made with the 2011 ESG Second Allocation funds.

7. Homeless Participation Requirement

In compliance with Section 576.405(a) of the Interim Rule, the County and City have engaged persons who are currently or formerly homeless in their planning process. Three formerly homeless individuals have participated in our planning process. The Co-Chair of the Rochester/Monroe County CoC is a formerly homeless individual. In addition to serving as CoC Co-Chair, he has been substantially involved in planning for the use of the 2011 ESG Second Allocation funding. Additionally, there is a second formerly homeless individual on the CoC Team, as well as another member of the Homeless Services Network, who have also been involved in the planning process for ESG funding.

8. Performance Standards

Performance standards for ESG recipients are required by HUD and have been developed in consultation with the CoC. The purpose of performance standards is to provide a measure for the ESG recipient and the CoC to evaluate each ESG service provider's effectiveness. It is anticipated that the County's performance standards for ESG activities will continue to evolve over time and will be developed to complement the CoC program performance measures.

Specific performance standards that will be applied to the ESG Heading Home Program are based on the proposed accomplishments of:

- Increase the range of housing options and related services for program participants
- Increase knowledge of rights and responsibilities through Tenant Education for 70% of program participants
- Increase the number of program participants stably housed at 12 months to 75%
- Reduce participant transiency by providing opportunities for safe and affordable housing
- Reduce the number of participants who have received prevention services from re-entering local shelter programs to 20% or less
- Prevent rapid re-housing participants from re-entering shelters

Requirements for Optional Changes to FY2011 Annual Action Plan

1. Centralized or Coordinated Assessment System

By centralizing intake and program admissions decisions, a coordinated entry process makes it more likely that families will be served by the right intervention more quickly. (*One Way In: The Advantages of Introducing a System-Wide Coordinated Entry for Homeless Families* - National Alliance to End Homelessness) The City of Rochester engaged the services of consultants Dennis Culhane and Suzanne Wagner to assist the community in developing and implementing a single point of access system (SPOA) for homeless services. The consultants have worked with the CoC, providers and stakeholders to develop a system based on the specific needs of the Rochester/Monroe County community. An update on progress was presented at the HSN meeting on February 15, 2012. The focus of the SPOA system will be to ensure that eligible persons and priority groups are served, clients' needs and the services received are consistent and stewardship of community resources. Common elements of the SPOA will include an application/assessment process, eligibility/intake standards, an eligibility determination process, prioritization of needs, a housing referral process and oversight to ensure compliance. The providers, stakeholders, the CoC, HMIS, City and County continue to work with the consultants to develop a system tailored to community need.

2. Monitoring

The City and County continually monitor the performance of all ESG-funded housing and homeless programs to ensure that they are carried out in accordance with applicable laws and regulations and to ensure that performance goals are achieved.

It is the intention of the City of Rochester and Monroe County to provide extensive joint and cooperative oversight of the ESG Heading Home Program, similar to the manner in which monitoring has been conducted on the HPRP program.