



PIERCE COUNTY
Department of Community Connections

**Emergency Solutions Grant (ESG) Substantial Amendment
to the FY 2011 One Year Action Plan**

The substantial amendment is prepared and submitted in accordance with Pierce County's citizen participation plan and U.S. Department of Housing and Urban Development (HUD) requirements of 24 CFR Part 91, as amended by the Interim Rule. The following substantial amendment is provided in accordance with FR-5594-N-01.

On January 27, 2012 HUD announced the amounts of the second allocation of FY2011 ESG programs for the ESG grants. In Fiscal Year 2011, Pierce County received an initial allocation of \$131,166 and a second allocation of \$73,781. The first allocation is through the Emergency Shelter Grant Program and the second allocation is through the Emergency Solutions Grant Program and subject to new regulations. To receive funds for the second allocation, Pierce County must prepare and obtain HUD approval through a Substantial Amendment to the FY 2011 One Year Action Plan.

A. Required Contents of Substantial Amendments

1. SF-424 – Attached

2. Summary of Consultation Process

Pierce County consulted with members of the Continuum of Care (CoC) in a couple of meetings held between the CoC, other entitlement jurisdictions and Pierce County to discuss how best to allocate funding to local homeless housing and service providers.

The first meeting on February 2, 2012, discussions included providing input related to the success of the Homelessness Prevention and Rapid Re-housing Program (HPRP), the desire to use existing policies and procedures as a foundation for local ESG policies and procedures and the use of the local centralized intake system to evaluate households eligible for ESG. In relation to the local success with rapid re-housing, there was discussion on the need to focus on that ESG component for the second allocation. As Pierce County has met the 60% threshold for emergency shelter activities for 2011, the County will accept proposals from sub-recipients for the component of rapid re-housing with this second allocation. Pierce County will provide ESG support to households in the county outside of the jurisdictions of the Cities of Tacoma and Lakewood.

The second meeting on March 1, 2012, discussions included making changes to existing policies and procedure resources as a basis for new local ESG policies and procedures and review of the HEARTH Act performance measures and the use of HMIS to track those measures.

3. Summary of Citizen Participation Process

The Substantial Amendment to the Action Plan was available to the public through advertisement in the Tacoma News Tribune and the Puyallup Herald and on the Department's website on April 4, 2012. The 30 day public comment period was April 4 through May 7, 2012. A public hearing was held on May 2, 2012 by the Citizen's Advisory Board.

Listed below is a summary of written and verbal comments received and how Pierce County will address the comments: There were no comments received.

4. Match

100% of match will be made through use of other federal funding, local government funding and private foundations.

Activity	Amount	Match Source
ESG Administration	\$8,813.00	Local; state; private funding
Rapid Re-housing	\$64,968.00	Private; federal funding
TOTAL	\$73,781.00	

5. Proposed Activities and Overall Budget

a. Proposed Activities

The second allocation to fund medium term rental assistance for rapid re-housing is being proposed to address the priority needs of Basic Needs and Family Services.

Pierce County is proposing that Metropolitan Development Council provide rapid re-housing financial assistance and services to approximately 25 households that are identified as "literally homeless" (Category 1 of the homeless definition). As funds for the second FY 2011 allocation are open to rapid re-housing only, housing relocation and stabilization services, as well as medium term rental assistance will be provided to fulfill the needs of those households that are homeless.

Allowable activities for each activity under financial assistance may include moving costs, rent application fees, security deposits, last month's rent, utility deposit and utility payments. Eligible services include housing search/placement, housing stability case management, mediation and legal services, budgeting and money management, Medium term rental assistance will allow 4 - 24 months of rental assistance.

Table 1: Declaration of FY 2011 Grant Fund Commitments

Activity Type	Obligated Amount
Homeless Assistance	\$0.00
Rapid Re-housing	\$64,968
Administrative Activities	\$8,813.00
Total FY 2011 Award	\$73,781.00

Performance Objective: Provide Decent Affordable Housing

Performance Outcome: Affordability

Start Date: Upon grant execution

Completion Date: 12 months from start date

Performance Indicators: 100% of persons/households will be covered by HMIS

Projected Accomplishments: Provide 25 households with rapid re-housing medium term rental assistance and stabilization services.

b. Discussion of Funding Priorities

Pierce County chose to fund this proposed activity to foster greater access to affordable permanent housing for homeless households.

The proposed activities will support the national priority to end homelessness for families, youth and children in 10 years by providing Rapid Re-housing resources to eligible households.

Funding for homeless programs has never matched the need, however, the funding climate in which the 10 year plan was written is rapidly deteriorating. The CoC remains hopeful that progress will be made with available funds. This will require extensive advocacy on the part of providers and the community at large to save the parts of the system that vulnerable families and individuals rely upon for survival, while transitioning to a system that does more than merely manage homelessness. At the same time, we are beginning to consider how we might address, and hopefully ease, the possibility of mass housing displacement among people currently housed but at very high risk because of cuts at the local and state level.

Inspired by the HEARTH Act, Pierce County will begin diverting households from time-limited supportive housing (emergency shelter and transitional housing) and placing them directly into permanent affordable housing or permanent supportive housing. Transitional supportive services tailored to the household's needs will be available as resources permit.

c. Detailed Budget

See Table 3 for detailed budget.

6. Written Standards for Provision of ESG Assistance

The ESG policies and procedures are being developed and finalized in collaboration between Pierce County, other entitlement jurisdictions and the CoC building upon the tools and standards developed for the previously funded HPRP program. It is the intent of the County to have policies and procedures implemented by the time of contracting. The County will ensure ongoing effectiveness of the program's design and standards. In addition, the County will ensure sub recipients comply with eligibility and verification requirements including HMIS. To ensure long-term compliance with program requirements, the County will monitor the activities carried out by the sub recipient as they relate to the goals and objectives of the Consolidated Plan.

Baseline Criteria

a. All households seeking assistance from ESG must meet a baseline of eligibility. This criterion is defined clearly by HUD. For all households deemed eligible, documentation supporting their status must be maintained on file by the ESG non-profit grantee.

1. Must willingly engage with an Initial Assessment with centralized intake for a consultation and assessment to determine ESG eligibility and be referred to appropriate ESG or related services:
2. Must be a household at or below 30 percent of Area Median Income (AMI)
3. Must be at risk of homelessness or homeless and:
 - a. Have no appropriate subsequent housing options identified
 - b. Lack financial resources and support needed to obtain new housing or remain in existing

housing.

Additional Guidance

1. Payment will only be made to third parties – landlords, utilities, etc.
2. Landlords accepting rental assistance checks must supply Tax ID # and W-9 Form.
3. No household will receive more than 12 months of assistance, with a re-assessment at 6 months.
4. The ESG Lead Paint Requirements will apply as required.
5. Housing Quality Standards will apply to newly leased units.
6. Households are required to contribute at least 30% of the family's gross income towards rent and cover 100% of utilities.

b. Standards will require homeless housing and service providers work with centralized intake to receive homeless housing referrals. Centralized intake will assess households for initial eligibility and refer to the appropriate provider. Programs providing rapid-re-housing financial assistance will be required to work through the Landlord Liaison Project for appropriate housing search and placement.

c. The determination for priorities will be as follows: 1) for the at-risk population, households with an Eviction Notice will be first priority. While others MAY be served, the most critical cases will be seen and evaluated first. 2) For rapid re-housing, the priority will be unsheltered households, then households that are in shelter programs. While others MAY be served, the most critical cases will be seen and evaluated first.

d. For cases of a short-term rental assistance (not to exceed 3 months), the household will be expected to contribute at least 30% of their monthly adjusted income and 100% of utilities. Medium-term rental assistance households are required to contribute at least 30% of the family's gross income towards rent and cover 100% of utilities.

e-f. Rapid Re-housing households may receive up to 12 months of rental assistance and/or housing stabilization and relocation services. All households will be reassessed at 6 months to determine eligibility and needs for continued rental assistance or services.

7. Describe Process for Making Sub-awards

A Notice of Funding Availability to receive Pierce County's second allocation of 2011 ESG funds was issued on March 21, 2012 and was due back to Pierce County Community Connections on March 28, 2012. Funds are available for Rapid Re-housing. Rapid Re-housing funds are available to any non-profit organization that operates an emergency or transitional housing program and has experience with the rapid re-housing model.

All proposal will be evaluated by the Proposal Evaluation Committee comprised of members of the Citizen's Advisory Board, Continuum of Care, private foundations, and local jurisdictions.

Once all proposals are evaluated, Pierce County intends to administer its ESG program by contracting with selected local homeless housing and service providers who directly assist individuals and households with children that are homeless.

8. Homeless Participation Requirement

Through the coordination efforts with the CoC, we will receive input from homeless or previously homeless individuals, as they are part of the CoC process. Throughout the development of the ESG program, input will be provided by the CoC in the establishment of policies and procedures.

9. Performance Standards

The ESG policies and procedures are being developed and finalized in collaboration between Pierce County, other entitlement jurisdictions and the CoC building upon the tools and standards developed for the previously funded HPRP program. These policies and procedures will include standards regarding performance and will be implemented at the time of contracting.

Providers receiving ESG funds will be monitored annually to insure that program guidelines are being followed. In addition, Pierce County will continue to consult with the CoC regarding the performance measures of the HEARTH Act and how best to utilize HMIS in producing valid and reliable reports.

10. Certifications: Attached

E. Requirements for Optional Changes to the FY 2011 Annual Action Plan

1. Centralized or Coordinated Assessment System

Pierce County's centralized intake and assessment system operated through Associated Ministries has been online since January 31, 2011. There is one number to call to access information and services for homeless housing. Centralized intake receives calls from potential clients and conducts initial eligibility screenings to determine whether or not they may be eligible for any number of housing resources. For eligible clients, centralized intake staff will conduct intake assessments to determine which provider to refer them to. For clients who do not qualify for ESG, staff will provide referrals to other community resources.

FY 2011 Detailed Budget Table

First Allocation		\$131,166.00		<u>FY 2011</u>	
Second Allocation		\$73,781.00		<u>Emergency Shelter Grants/Emergency Solutions Grants</u>	
Grant Amount		\$204,947.00		<u>Program Allocations</u>	
Total Administration		\$15,371.03			
		First Allocation		Second Allocation	Total Fiscal Year 2011
Eligible Activities		Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$87,960.00	\$0.00		\$87,960.00
	<i>Rehab/Conversion</i>	\$0.00			\$0.00
	<i>Operations</i>	\$48,610.00			\$48,610.00
	<i>Essential Services</i>	\$39,350.00			\$39,350.00
	Homelessness Prevention	\$36,648.00			\$36,648.00
	Administration	\$6,558.00			\$6,558.00
Emergency Shelter Grants Subtotal		\$131,166.00	\$0.00		\$131,166.00
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	<i>Renovation**</i>			\$0.00	\$0.00
	<i>Operation**</i>			\$0.00	\$0.00
	<i>Essential Service**</i>			\$0.00	\$0.00
	<i>URA Assistance**</i>			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS				\$0.00
	Rapid Re-housing		\$0.00	\$64,968.00	\$64,968.00
	<i>Housing Relocation and Stabilization Services</i>			\$24,968.00	\$24,968.00
	<i>Tenant-Based Rental Assistance</i>			\$40,000.00	\$40,000.00
	<i>Project-Based Rental Assistance</i>				\$0.00
	Homelessness Prevention		\$0.00	\$0.00	\$0.00
	<i>Housing Relocation and Stabilization Services</i>				\$0
	<i>Tenant-Based Rental Assistance</i>				\$0
	<i>Project-Based Rental Assistance</i>				\$0.00
	Administration			\$8,813.00	\$8,813.00
Emergency Solutions Grants Subtotal			\$0.00	\$73,781.00	\$73,781.00
		Total Grant Amount:			\$204,947.00

**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).