

DEPARTMENT OF DEVELOPMENT

CITY OF CANTON, OHIO

EMERGENCY SOLUTIONS GRANT SUBSTANTIAL AMENDMENT DRAFT



CITY OF CANTON FY2011 AND FY2012 ANNUAL ACTION PLAN

EMERGENCY SOLUTIONS GRANT SUBSTANTIAL AMENDMENT

The City of Canton Department of Development (DOD), has prepared a draft substantial amendment to the 2011 and 2012 City of Canton Consolidated Plan, One Year Action Plan in accordance with the DOD's Citizen Participation Plan and the requirements of 24 CFR Part 91, as amended by the Interim Rule.

- 1. SF424 Attached**
- 2. Summary of Consultation Process**

The City of Canton's Emergency Solutions Grant program will be implemented in full accordance with the City's approved 2010-2015 Consolidated Plan and amends the 2011-2012 Annual Action Plan to meet 24CFR91.100 requirements for local governments.

Continuum of Care Consultation: The City of Canton Department of Development has maintained a collaborative working relationship with the Stark County Homeless Council (SCHC) for more than 8 years, formerly known as the Stark County Inter-Agency Council on Homelessness (SCICH), which operates as the Continuum of Care. Members of the city of Canton met with the SCHC President to discuss new ESG requirements and opportunities. The city of Canton also attended an Evaluation and Review Committee meeting which is a subcommittee of the SCHC to discuss the 2011 Phase II allocation, 2012 allocation, and priorities and Standard Procedures for implementing the ESG Program.

Members of the SCHC include local elected officials, service provider agencies, formerly homeless individuals and advocates. The overarching mission of the SCHC is to oversee the development of an effective plan to address homelessness in the County. HUD funds have provided thousands of dollars to agencies serving the most vulnerable homeless people.

Performance standards and priorities were developed in consultation with SCHC. As a result, the information will include key performance indicators for local SCHC goals and meet reporting requirements established by HUD for ESG.

ESG 2011-2012 funding continues to support emergency shelter and housing support services while also expanding prevention for vulnerable populations identified with Canton.

All City of Canton ESG funding will be reported through the local HMIS system. All agency programs that were selected for funding were submitted to Canton City Council for public hearing. Canton City Council will pass an ordinance approving entering into contracts for ESG on/before May 15, 2012.

[The chart below outlines all meetings to date to discuss ESG requirements, develop Standard Operating Procedures and prepare the Substantial Amendment].

Date	Met With	Purpose
February 27, 2012	Chairperson SCHC	Assemble priorities and standard operating procedures
March 27, 2012	Chairperson SCHC	Assemble priorities and standard operating procedures
April 5, 2012	SCHC's Evaluation & Review Committee	Assemble priorities and standard operating procedures
April 9, 2012	Stark County Homeless Council	Assemble priorities and standard operating procedures

3. Summary of Citizen Participation Process

A draft of this Substantial Amendment was brought to the SCHC on April 9th, 2012. Announcements regarding the public hearing and public comment period were published in the Canton Repository on April 13, 2012. The announcement stated that the public comment period would close on April 30, 2012 and included a summary of all key elements of this Substantial Amendment, FY2012 Annual Action Plan. To comply with the new regulations, a revised Citizen Participation Plan is being proposed that will fulfill the new requirements.

Additional outreach was accomplished via a posting of the Substantial Amendment on the City's website at www.cantonohio.gov.

A public hearing on the Substantial Amendment will be held before the Canton City Council. (Summary comments here). The public comment period was April 13, 2012 through April 30, 2012, (Summary comments here).

4. Match

Provided below is a list of all projects for FY2011 and PY2012 funding that will be selected through the RFP process and approved by Canton City Council.

100% match will be made through use of private monetary donations and volunteer hours.

Cash	In-Kind	Organization	Amount	Use of the Funds

5. Proposed New Activities for 2011 Phase II and FY2012

A. Proposed Activities

The Canton FY2011 ESG Program will include the completion of existing Emergency Shelter Grants program activities for the initial 2011 allocation as contained in the initial 2012 Annual Action Plan:

<u>AGENCY</u>	<u>2011 FUNDING</u>	<u>ACTIVITY TYPE</u>
YWCA of Canton	\$15,000	Renovations
Refuge of Hope	\$15,000	Renovations
Otis Gibbs Helping Hands Center	\$12,600	Operational Costs
ICAN	\$11,197	Homeless Prev.
Catholic Charities	\$11,197	Homeless Prev.
Domestic Violence Administration	\$50,000	Essential Services
	<u>\$11,850</u>	
TOTAL ESG FUNDING	\$126,844	

B. Canton's Priority for FY2011 Phase II

1. HMIS
 2. Homeless Prevention
 3. Administration
- Total 2011 ESG funding \$71,350

C. Canton's Priority for FY2012

1. Homeless Prevention
 2. Renovation
 3. Essential Services
 4. Operating Costs
 5. HMIS
 6. Administration
- Total 2012 HESG funding \$226,606

In addition, Emergency Solutions Grant activities for FY2011 and FY2012 will be implemented, including:

6. Homeless Prevention – Housing Relocation and Stabilization Services (2011 Phase II - 2012)

Corresponding priority needs from recipient's Annual Action Plan:

- a. Assisting low income families avoid becoming homeless

Concise description of activity

Financial Assistance

- Moving costs
- Security deposit / last month's rent
- Utility deposit / Utility payments
- Short Term Rental Assistance (not to exceed 24 months)

Services

- Housing stability case management (both before and/or after lease-up)
- Housing search / placement
- Credit repair / budgeting / money management
- Landlord-Tenant mediation

Corresponding standard objective and outcome categories:

- Decent Housing / Sustainability

Rationale for Priorities

The City of Canton has chosen to prioritize phase II ESG funds for Homeless Prevention. The City of Canton has chosen not to allocate funding to rapid re-housing for 2011 Phase II or 2012.

The decision to allocate \$71,350 in this category is based on need and the knowledge that there are substantial funds already targeted toward Rapid Re-Housing of \$208,000 for PY2012 and with the possible renewal funding for PY2013 through the SCICH funding.

Canton has elected to allocate funding to Housing Relocation and Stabilization services. This helps to fill a critical gap in case management, and provides maximum flexibility for local sub-recipient providers to respond to the individual needs of homeless households with funding for activities such as rental assistance, security deposits and housing outreach.

Challenges

There is insufficient housing stock that exists in Canton. The housing reality is that the targeted population must either find subsidized housing, or go under heavy rent burden maintaining their housing status as precarious.

The Interim ESG rule that caps assistance to those just under 30% will require finding housing with utilities at a cost of \$300 a month. Some of the older housing stock can have heating bills alone of \$500 a month in winter. The cost for each additional family member is \$50 per member. A family needing a three-bedroom unit could only afford \$490 per month including utilities. The current HUD reasonable housing cost for Canton city area, for a 1-bedroom unit is \$505. The challenge is finding a housing provider who will take rents below reasonable costs and agree to the requirements that ESG payment bring with them. The reality is that most of the clients below 30% area median income must be in subsidized housing or under heavy rent burden.

(For a detailed budget of planned activities and funding levels accounting for entire first and second allocations for 2011 and 2012, please refer to the Budget Table)

7. Standards for Provision of ESG Assistance

Eligibility for Services:

To be eligible for ESG assistance, all households must meet the definition of homelessness posted by HUD on November 15, 2011. That definition is as follows:

(a) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(b) Individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(c) Individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government program for low-income individuals); or

(d) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

(1) An individual or family who will imminently lose their primary nighttime residence, provided that:

- (i) The primary nighttime residence will be lost within 21 days of the date of application for homeless assistance, which must be in writing;
- (ii) No subsequent residence has been identified; and
- (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

- (2) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 USC 14043e-2) section 330(h) of the Public Health Service Act (42 USC 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 USC 2012), section 17(b) of the Child Nutrition Act of 1966 (42 USC 1786 (b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 USC 11434a);
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addition, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of stable employment; or
- (3) Any individual or family who:
- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - a. Has no other residence; and
 - b. Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Specific Eligibility for Homelessness Prevention

Homelessness Prevention Services are available only to persons below 30% of Area Median Income or at imminent risk of becoming homeless.

Homelessness Prevention Services may be used to prevent an individual or family from becoming homeless or to help an individual or family regain stability in current housing or other permanent housing. Eligible Homelessness Prevention activities will include Housing Relocation and Stabilization Services.

Allowable activities under rapid re-housing and homelessness prevention components:

***Financial Assistance**

- Moving costs
- Security deposit / last month's rent
- Utility deposit / Utility payments
- Short Term Rental Assistance (not to exceed 24 months)

**No financial assistance may be provided to a household for a purpose and time period supported by another public source.*

Services

- Housing stability case management (both before and/or after lease-up)
- Housing search / placement
- Credit repair / budgeting / money management
- Landlord-Tenant Mediation

Local Coordination of Shelter and Services

At the local level, emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers are coordinated through the Stark County Homeless Council which include task forces, working groups, or inter-agency teams to ensure coordination of services for homeless and at-risk households.

Prioritization and Further Eligibility for Households

Prioritization of eligible families for both rapid re-housing and homelessness prevention services will be determined by the local non-profit ESG sub-recipient and/or the local task force or inter-agency team, using a risk-based assessment at the time of initial program intake and screening.

Prevention

Only persons who are below 30% of area median income, and who are at imminent risk of homelessness according to part (2) of the November 15, 2011 definition, and who otherwise lack adequate resources to prevent homelessness will be eligible for ESG homelessness prevention assistance. Non-Profit sub-recipients providing such assistance must document household income information and proof that homelessness is imminent, and maintain this documentation along with client HMIS data. No financial assistance may be provided to a household for a purpose and time period supported by another public source.

Special Guidance on Case Management

Subrecipients using ESG funding to fund Case Management activities must understand and agree to the following special guidance.

Clarifying Case Management vs. Intake/Screening

While acknowledging that case management should remain flexible to best serve the individual needs of households, the following defines basic expectations as to what is provided. This is preceded by a definition of Intake/Screening, another essential function for programs serving the homeless.

Intake/Screening: *To provide coordination at the program or community level; and direct financial assistance where appropriate.*

Record base household information to determine immediate need, and eligibility for other assistance.

Assess if a household's needs can be met with financial assistance alone (such as back rent, mortgage arrearage, security deposit), or if more intensive supports are required.

Provide financial assistance where appropriate

Determine what initial referral may be appropriate (case management, shelter, etc.).

Follow-up on initial referral to prevent a household from “falling through the cracks.”

Case Management: *To provide coordination for the household; to provide more intensive interaction and services for clients deemed unlikely to resolve their housing crisis with short-term financial assistance alone.*

Work closely with the household to acquire and maintain stable housing which is affordable to them.

Determine (in consultation with household and other community partners, if applicable) who shall be the lead case manager for the household.

Work with participants to develop a housing plan, set goals, and help participants stay on course.

Employ best practices to help the household identify its strengths and opportunities, as well as underlying issues which may have led to homelessness, or could undermine success if not addressed.

Provide information and encouragement for the household (or members of the household) to avail themselves of other appropriate services or take appropriate action to address barriers.

Maintain a relationship with household, identifying the appropriate level of support without creating over-dependence. This includes providing – when appropriate – follow-up case management for higher-risk families after they have moved into permanent housing.

8. Process for Making Sub-Awards (for all ESG funding)

One or more grants will be awarded by the City of Canton whose purpose is to shelter, serve and/or re-house the homeless. Applications for ESG funding will be evaluated by the City of Canton Department of Development Scoring committee.

Part of the selection process may involve a site visit of the finalists at which time documentation listed in the application will be reviewed. Eligible participants are approved non-profits including community and faith-based organizations that:

1. Certify that the assisted property will be maintained as an Emergency Shelter for at least:
 - a. 10 years if grant is used for major renovation or conversion of building;
 - b. 3 years if grant is used for rehab other than major renovation or conversion
 - c. The period of funded assistance provided that the assistance is not rehabilitation or renovation; and
2. Provide evidence of a match

Selection of applicants for funding will be made based on the following:

Meeting of criteria as outlined in this document and detailed in the Request for Proposal (RFP).

The applicant's history of providing effective shelter or prevention services to the homeless, and of successfully operating performance-based grant-funded programs.

The applicant's effective coordination with organizations in their local "continuum of care", to address identified gaps in services for the homeless and improve outcomes for participants.

If the applicant is requesting ESG Operations funding: Assurance that funds will preserve or support existing shelter bed capacity.

If applicant is requesting ESG, Rapid Re-Housing or Prevention funding: The applicant's ability to transition homeless participants or shelter residents to permanent or transitional housing, and/or prevent homelessness for families and individuals who are at risk.

Grant funds may not be used for the following:

Acquisition/mortgage costs;

Rehabilitation services such as preparation of work specifications, loan processing or inspections

Renovation, rehabilitation or conversion of buildings owned by primarily religious organizations or entities unless the structure being renovated has been leased to a wholly secular organization.

Additional guidance on eligible and ineligible uses of ESG funds are contained in the Department of Housing and Urban Development's ESG program guidelines, and in grant agreements between the City of Canton and its subrecipients.

9. Homeless Participation Requirement

The City of Canton presented the Substantial Amendment to the Stark County Homeless Council Executive Committee on April 9, 2012. Members of the Stark County Homeless Council's Executive Committee include a homeless housing provider. The amendment was also presented to the Homeless Services Collaborative Planning Committee on April 11, 2012 and the full Homeless Services Collaborative on April 18, 2012. Membership of these two groups include homeless housing and service providers as well as formerly homeless individuals.

10. Performance Standards

Beyond traditional output measures – such as the number of persons in emergency shelter, the number of shelter bednights provided, or the number of households receiving homelessness prevention assistance – the City of Canton have adopted performance-based contracting with the goal of ending homelessness. Outcome performance measures are tailored to the category of ESG activity for which funding is awarded, as shown below:

A. Emergency Shelter Operations

To establish a baseline data, Subrecipients will report on the number of new shelter residents, the number of residents exiting the program, and the average length of stay, average income, number of households with no income, number of chronically homeless, number with a disabling condition (adults and children), number of families with children, number of adults, number of children, number with criminal history (other than minor traffic violations).

Subrecipients receiving ESG funds will be paid on a reimbursement basis.

B. Homelessness Prevention

At least 70% of households will have their housing stabilized or be safely rehoused within 30 days. **AND** 50% of the above households will continue to be in stable housing at least 90 days following assistance.

Subrecipients using ESG Prevention funds to place families in short-term emergency motels will ensure that the average motel stay does not exceed 7 days and that 75% of households placed in motels meet with a case manager within 3 days.

C. Housing Case Management

At least 50% of eligible households referred for case management, case coordination, and/or housing advocacy (DV) will meet with a case manager/coordinator/advocate within 14 days.

- Within 15 days of the initial case management/coordination/advocacy meeting the household, a service plan will be in place.
- Within 45 days of referral, at least 90% of referred households will have at least 1 adult in the household who is employed **OR** has enrolled in an educational or training program **OR** has applied for or qualified for income benefits such as TANF, SSI or GA
- Within 28 days of referral, at least 70% of households receiving case management/coordination or advocacy services will be stabilizing in transitional or permanent housing; **AND** At least 70% of those households will remain stably housed for at least 90 days.

The Department of Development tracks performance measures for ESG subrecipients quarterly. In the event that a subrecipient's fails to meet performance measures, it may result in the cancellation of the grant agreement. An ability to meet or exceed performance targets will be favored consideration for future awards.