

**SUBMISSION OF
SUBSTANTIAL AMENDMENT TO
CONSOLIDATED PLAN
FOR THE
EMERGENCY SOLUTIONS GRANT (ESG)**

FY2011



The City of Erie, Pennsylvania

Joseph E. Sinnott, Mayor

May 7, 2012

Mr. John Tolbert, Director
Community Planning and Development
U.S. Department of Housing and Urban Development
William S. Moorhead Federal Building
1000 Liberty Avenue, Suite 1000
Pittsburgh, PA 15222-4004

Attention: Ms. Debbie Bowie

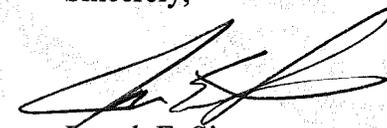
**RE: Submission of Substantial Amendment to Consolidated Plan
For the Emergency Solutions Grant (ESG) Program**

Dear Mr. Tolbert:

Please accept this Substantial Amendment for the Emergency Solutions Grant Program (ESG) as fulfillment of the City of Erie's requirement for the Annual Plan Amendment for FY2011.

If you have any questions regarding this update, please do not hesitate to contact Debra Smith or Cyndie Zahner at (814) 870-127 or (814) 870-1271, respectively. Thank you for your assistance in this matter.

Sincerely,



Joseph E. Sinnott
Mayor, City of Erie

JES:smd
Enclosure

OFFICE of the MAYOR

Room 500 • 626 State Street • Erie, PA 16501
Voice: (814) 870-1204 • Fax: (814) 870-1329



**APPLICATION FOR ASSISTANCE
SF-424**

Application for Federal Assistance SF-424

Version 02

*1. Type of Submission:

- Preapplication
- Application
- Changed/Corrected Application

*2. Type of Application

- New
- Continuation
- Revision

* If Revision, select appropriate letter(s)

*Other (Specify)

3. Date Received:

4. Applicant Identifier:

2011 Emergency solutions Grant

5a. Federal Entity Identifier:

*5b. Federal Award Identifier:

State Use Only:

6. Date Received by State:

7. State Application Identifier:

8. APPLICANT INFORMATION:

*a. Legal Name: The City of Erie

*b. Employer/Taxpayer Identification Number (EIN/TIN):
25-60000857

*c. Organizational DUNS:
07-495-7028

d. Address:

*Street 1: 626 State Street

Street 2: _____

*City: Erie

County: Erie

*State: PA

Province: _____

*Country: _____

*Zip / Postal Code 16501-1128

e. Organizational Unit:

Department Name:
Dept. of Economic and Community Development

Division Name:
N/A

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Ms. *First Name: Brenda

Middle Name: _____

*Last Name: Sandberg

Suffix: _____

Title: Director

Organizational Affiliation:
City of Erie, Department of Economic and Community Development

*Telephone Number: (814) 870-1270

Fax Number: (814) 870-1443

*Email: bsandberg@erie.pa.us

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***9. Type of Applicant 1: Select Applicant Type:**

C. City or Township Government

Type of Applicant 2: Select Applicant Type:

Type of Applicant 3: Select Applicant Type:

*Other (Specify)

***10 Name of Federal Agency:**

U.S. Department of Housing and Urban Development

11. Catalog of Federal Domestic Assistance Number:

14.231

CFDA Title:

Emergency Solutions Grant

***12 Funding Opportunity Number:**

MBL-SF424 FAMILY-ALL FORMS

*Title:

Emergency Solutions Grant

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

The City of Erie, PA

***15. Descriptive Title of Applicant's Project:**

The City of Erie is a direct entitlement under the 2011 Emergency Shelter/Emergency Solutions Grant as established under the McKinney-Vento Homeless Act, as amended by the Homeless Emergency and Rapid Transition Housing Act of 2009. The City anticipates receiving \$87,148 for funding of eligible activities under this program.

Application for Federal Assistance SF-424

Version 02

16. Congressional Districts Of:

*a. Applicant: 21

*b. Program/Project: 21

17. Proposed Project:

*a. Start Date: 07-01-2012

*b. End Date: 07-30-2013

18. Estimated Funding (\$):

*a. Federal	_____	\$87,148.00
*b. Applicant	_____	
*c. State	_____	
*d. Local	_____	
*e. Other	_____	
*f. Program Income	_____	
*g. TOTAL	_____	\$87,148.00

***19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

- a. This application was made available to the State under the Executive Order 12372 Process for review on _____
- b. Program is subject to E.O. 12372 but has not been selected by the State for review.
- c. Program is not covered by E. O. 12372

***20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes", provide explanation.)**

- Yes No

21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U. S. Code, Title 218, Section 1001)

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions

Authorized Representative:

Prefix: Mr. *First Name: Joseph

Middle Name: E.

*Last Name: Sinnott

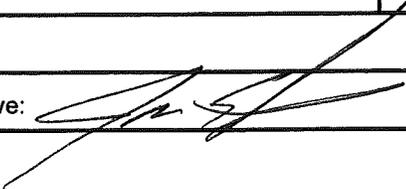
Suffix: _____

*Title: Mayor, City of Erie

*Telephone Number: (814) 870-1200

Fax Number: (814) 870-1208

* Email: jsinnott@erie.pa.us

*Signature of Authorized Representative: 

*Date Signed: 05-07-12

Application for Federal Assistance SF-424

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***Applicant Federal Debt Delinquency Explanation**

The following should contain an explanation if the Applicant organization is delinquent of any Federal Debt.

N/A

**SUBSTANTIAL AMENDMENT
FOR
EMERGENCY SOLUTIONS GRANT**

**Substantial Amendment to the Consolidated Plan 2011 Action Plan for the
Emergency Solutions Grant (ESG)**

Grantees eligible to receive funds under the Emergency Solutions Grant (ESG) are required to complete a substantial amendment to their Consolidated Plan Emergency Solutions Grant (ESG) Action Plan. This form sets forth the required format for this substantial amendment. A completed form is due to HUD by May 15, 2012 of the publication of the HUD ESG notice.

ESG grantees are required to follow their Consolidated Plan's citizen participation process, including consultation with the Continuum of Care (CoC) in the appropriate jurisdiction(s). Grantees are also required to coordinate ESG activities with the CoC's strategies for homeless prevention and ending homelessness. There will be a 30 day public comment period beginning March 15, 2012.

A complete submission contains the following three documents:

- 1) A signed and dated SF-424
- 2) A completed form HUD-40119 (this form), and
- 3) Signed and dated General Consolidated Plan and ESG certifications.

For additional information regarding the ESG program, visit the HUD Homelessness Resource Exchange (www.hudhre.info). This site will be regularly updated to include ESG resources developed by HUD and its technical assistance providers.

**Substantial Amendment to the Consolidated Plan 2011 Action Plan for the
Emergency Solutions Grant (ESG)**

General Information

Grantee Name	City of Erie
Name of Entity or Department Administering Funds	Department of Economic and Community Development
Contact person (person to answer questions about this amendment)	Brenda Sandberg
Title	Director
Address Line 1	626 State Street
Address Line 2	Room 404
City, State, Zip Code	Erie, PA 16501-1128
Telephone	814-870-1270
Fax	814-870-1443
Email Address	bsandberg@erie.pa.us
Authorized Official (if different from Contact Person)	Mr. Joseph E. Sinnott
Title	Mayor
Address Line 1	626 State Street
Address Line 2	Room 500
City, State, Zip Code	Erie, PA 16501-1128
Telephone	814-870-1200
Fax	814-870-1208
Email Address	jsinnott@erie.pa.us
Web Address where this Form is Posted	http://www.erie.pa.us

Amount Grantee is Eligible to Receive*	\$87,148
Amount Grantee is Requesting	\$87,148

Expenditure Limit: \$87,148

Table 1. FY2010 Grant Fund Commitments

Activity Type	Obligation Amount
Homeless Assistance	\$ 147,101
Homeless Prevention	0
Administration	7,817
Total:	\$154,918

1. **Consultation**

A. **The City of Erie consulted with the following:**

- a) Housing Sub-committee of the Continuum of Care (CoC) at a meeting on February 24, 2012.
- b) The Executive Committee of the CoC on March 5, 2012.
- c) The HOME Team of the CoC on March 8, 2012.

2. **Citizen Participation – Hearing**

A Citizens Participation hearing was held on March 6, 2012.

1. **SF 424 – Included**

The SF 424 Form was provided at the beginning of this Amendment.

2. **Summary of Consultation**

The City of Erie consulted with the Continuum of Care (CoC) in several meetings between the CoC Housing Sub-committee (2/24/12), the CoC Executive Committee (3/5/12), and the CoC Home Team (3/8/12). (**See Attachment A** for minutes of meetings and handouts). The City of Erie has met the 60% threshold for emergency shelter activities. The City of Erie will allocate funding for a subrecipient for the delivery of the additional rapid re-housing. The subrecipient would need proficiency in the following areas:

- 1) Partnering with CoC members to receive referrals
- 2) Providing case management services to rapid re-housing recipients
- 3) Documenting recipient files in compliance with ESG regulations, and
- 4) Disbursing financial assistance for client security deposits and rent

The City was required to consult with the CoC on the following three areas.

1. *Allocation of ESG funds for Eligible Activities*

The City of Erie's funding will be eligible for assisting those living in the City of Erie. The funding is eligible for the following:

- Rapid Re-Housing – Rental Assistance
- Rapid Re-Housing – Housing Relocation and Stabilization Services
- Administrative – Costs associated with the administration of ESG (maximum 7.5% of allocation).
- HMIS
- Homeless Prevention – Rental Assistance
- Homeless Prevention – Housing Relocation and Stabilization Services

The City of Erie will target rapid re-housing activities.

2. *Developing Performance Standards for Activities*

The City developed performance standards that everyone should have safe, decent housing and living conditions. These standards were discussed at the Executive Committee meeting on March 5, 2012, and the Home Team Meeting on March 8, 2012. These standards were approved at the March 8, 2012 meeting.

3. *Developing Funding, Policies and Procedures for the Operation and Administration of HMIS*

Funding for the operation and administration of HMIS will entail what is required for reporting purposes in quarterly e-snaps reports, Action Plan and CAPER. Project Hope Outreach is the designated component connected with management information for Erie County. The outreach workers maintain up-to-date information on social services available to the homeless.

Erie County's Homeless Management Information System is an electronic web-based database application. The HMIS-Erie system is administered by the Executive Director and the IT Manager of the Erie United Methodist Alliance. The system is accessible to all participating homeless service providers and other community-based programs that have been issued authorized log-ons and have participated in one-on-one user training. The system provides data collection, client tracking, bed availability, identification of gaps or duplications in services, unduplicated counts of homeless individuals and families (including the compilation of chronic individuals), and formulates reports required by funding sources and community planning.

3. Summary of Citizen Participants

a) Summarize Process

The City of Erie, through its Citizen Participation Plan, provides the following information to citizens, public agencies, and other interested parties via public meetings: (1) the amount of assistance the City expects to receive; (2) the range of activities that may be undertaken; and (3) the estimated amount of funds that will benefit persons of low and moderate income.

The City will provide citizens with the opportunity to comment on this substantial amendment to the Consolidated Plan. Prior to implementing any substantial change, the City provided citizens with information on the proposed amendment by publishing a public notice of the proposed amendment as an advertisement in the Erie Times News, February 17, 2012. In addition, the City also placed copies of the proposed amendment at the locations in the City outlined in the HUD-approved Citizen Participation Plan.

The City will provide at least 30 days for citizens to submit written or oral comments or views on the proposed amendment. The City will consider these comments or views of citizens in preparing the substantial amendment of the Consolidated Plan. A summary of these comments or views, and a summary of any comments or views not accepted and the reasons therefore, will be attached to the substantial amendment of the Consolidated Plan. The City will also comply with any additional actions required by local law.

Additionally, a public hearing was held in Erie City Council Chambers to discuss the needs/proposed use of funds for the FY2012 Annual Plan, and projected the Substantial Amendment on Tuesday, March 6, 2012 at 10:00 a.m. and to accept comments on the proposed substantial amendment.

b) Summarize the Public Comments or Views Received

Pat Herr, Community Shelter Services, would like to be on record with the willingness of Community Shelter Services to help with the distribution of Rapid Re-Housing allocations. Community Shelter has run a successful homeless Rapid Re-Housing Program in the last three years. They are very well connected to the community, and have the machinery to run the program. They have assisted over 2,000 at-risk people either to exit shelters or maintain their homes. He stated the HPRP has been a very successful program, and Community Shelter Services is interested in helping in any way.

Response to Public comment: City staff discussed the allocation of the additional funding, the performance standards, and the development of policies and procedures for the additional funding at the Continuum of Care (CoC) Housing Committee on February 24, 2012; the CoC Executive Committee on March 5, 2012, and the CoC General Membership meeting on March 8, 2012. The City discussed both the selection of a subrecipient to provide services and the solicitation of proposals through a request for proposal (RFP). In both instances, it was agreed a sole provider should be selected/procured for the delivery of the additional rapid re-housing services. It was stated that the provider would need proficiency in the following areas:

- 1) Partnering with CoC members to receive referrals,
- 2) Providing case management services to rapid re-housing recipients,
- 3) Documenting recipient files in compliance with ESG regulations, and
- 4) Disbursing financial assistance for client securing deposits and rent.

Because of the importance and nature of these provisions, and due to limited funding, the City has decided to contract with a current subrecipient who has experience in all areas. The subrecipient selected to deliver these services is GECAC. GECAC has both the capacity and experience to deliver services in an efficient and timely manner.

The City received one letter regarding the substantial amendment from Mr. Pat Herr, Community Shelter Services (see **Attachment D** for Mr. Herr's letter and the City's response letter.)

c) **Summarize the Comments or Views not Accepted, including the Reason for Not Accepting Those Comments or Views**

Grantee received and accepted all public comments or views received.

4. **Match**

100% match will be made through use of cash match resources in excess of the required fifty-percent (50%) from United Way, A Coalition Against Domestic Violence (PCADV), Project Connect, CTF, Erie County Office of Mental Health/Mental Retardation, private gifts, donations, bequests and memorials, religious charities Office of Children & Youth; Department of Public Welfare (HAP), civic groups, annual appeals and Neighborhood Tax Credit contributions, agency newsletter income, in-kind service hours by St. Patrick's Haven's Directors and volunteers, and other resources.

A total of \$90,000 will be used for match for salaries and operational expenses not covered by the ESG program.

5. **Proposed Activities and Overall Budget**

a.) **Proposed Activity**

The selected activity for the additional ESG funding is rapid re-housing. (See **Attachment B** for CPMP activity sheets.) This activity was selected after consultation with CoC Home Team members and is consistent with the goals and objectives of City and County Homeless strategies.

There are no reprogramming funds from the first allocation.

- 1.) **Priority Need:** This project addresses the City of Erie's five year 2010-2014 Consolidated Plan that states: Under Erie's program, imminently or newly homeless due to circumstances related to the economic crisis will be given highest priority. (Pg 75) Both the five year Consolidated plan and the FY2011 Annual Action Plan address the eight goals set by the Erie County 10 year Strategic Plan, one of which is the focus on housing first (rapid re-housing.) (Pg 72 of the Consolidated Plan and Pg FY11-96 of the Fiscal Year 2011 Annual Plan.)
- 2.) **Activity Description:** This project proposes to assist 25-30 families and/or individuals and approximately 45-70 people that are at or below 30% of the area median income. The City will fund a portion of the security deposit and up to three months rent. The population targeted will be newly homeless individuals/families. Individuals/families will be required to pay the first \$100 of the security deposit. This \$100 requirement was suggested by the Continuum of Care Housing Sub-Committee. The Sub-Committee felt a \$100 requirement would give clients a more vested interest in the program and would attract the temporarily homeless due to circumstances such as an economic crisis as opposed to the chronically homeless.

- 3.) **Standard Objective Category:** The standard objective of this activity is to improve the living environment of beneficiaries and/or to help them find a suitable living environment and the outcome is the availability/accessibility of housing to low-income persons who otherwise would not have it.
- 4.) **Start/Complete Dates:** The start date of the project will be July 1, 2012 and the project will be completed by June 30, 2013.
- 5.) **ESG and other Funding Amounts:** The amount to be expended is \$87,148. \$76,740 will be expended for the rapid re-housing project and \$10,408 of administrative dollars will be added to the current FY2011 administrative budget of \$7,746 for a total of \$18,154. This amount equals 7.5% of the total allocation. Matching funds will be, at a minimum, \$90,000.
- 6.) **Performance Indicators:** Performance indicators to be tracked include the number of households assisted into permanent housing, the number of people in each household, and the number of months that each household was homeless.
- 7.) **One Year Accomplishments:** The City estimates that the number of households to be assisted within one year is 25-30 and the total number of people within those households will be approximately 45-70.
- 8.) **Overall Grant Accomplishments:** The City estimates that the project will be completed within one year and therefore, the number of households estimated to be assisted will also be 25-30 and the total number of people 45-70.

b.) Discussion of Funding Priorities

- 1.) The City of Erie has chosen to allocate the second allocation of ESG FY2011 funding to rapid re-housing and administration. The City of Erie has reached the 60 percent cap for street outreach and emergency shelter. \$147,183 was allocated for emergency shelter/transitional housing operations and essential services from the first FY2011 allocation. The entire second allocation must now be expended on Rapid Re-Housing, Homeless Prevention, or HMIS. The City has elected to dedicate all of the funding to rapid re-housing and target the newly homeless. This funding priority is the result of HUD's strong encouragement that the second allocation be used toward rapid re-housing along with the City's Consolidated Plan priority of assisting the newly homeless and the recommendations of the CoC Housing Sub-Committee that the newly homeless be targeted.
- 2.) The median household income in Erie is \$28,747 as compared to Pennsylvania's median income of \$49,288. Additionally, of the occupied housing units in the City, only 34.2% are owned free and clear as compared to Pennsylvania's rate of 45.2%. The renter occupied rate for the City is a lofty 47.7% as compared to Pennsylvania's 30.4%. With less people owning their homes free and clear, with Erie's low median income, and with nearly half of the population renting, Erie is at a much greater risk of finding newly homeless individuals or families searching for safe and affordable housing. The recent economic downturn coupled with area business closings and layoffs has resulted in more families, who have never been homeless in the past, being on the brink of homelessness.
- 3.) This funding priority is in alignment with the Federal Strategic Plan to Prevent and End Homelessness. The project increases access to stable and affordable

housing of individuals and families by helping them secure initial funding to rent safe and affordable housing. It also helps them increase economic security and improve health and stability by alleviating housing costs for a few months and allowing them to realign their financial goals.

- 4.) One obstacle to addressing the needs of, in particular, the newly homeless population is the connotation that is often associated with asking for help and seeking assistance. Because of this, in addition to making the program known to emergency shelter and transitional facilities, services will be made known to the entire HOME Team whose diverse members include many counseling services for a wide population.

c.) Detailed Budget

FY2011 DETAILED BUDGET TABLE

First Allocation	\$154,930	FY2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations			
Second Allocation	87,148				
Grant Amount	242,078				
Total Administration	18,154				
<u>Eligible Activities</u>		First Allocation	Second Allocation	Reprogrammed Amount	Total
Operations		\$128,787		\$0	\$128,787
Essential Services		18,397		0	18,397
Administration		7,746	\$10,408	0	18,154
Rapid Re-Housing			76,740	0	76,740
Total		154,930	87,148	0	242,078

6. Written Standards for Provisions of ESG

Below are the written standards for providing the proposed ESG second allocation of FY2011 funding. These standards are meant as initial guidelines and will continue to be updated and refined.

a.) Standard Policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.

The subrecipient must conduct an initial evaluation to determine if each individual or family is eligible for ESG assistance and what amount and type of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment

requirements set forth under §576.400(d) and the written standards established under §576.400(e).

24 CFR 576.4 makes the following requirements:

- Subrecipient must use the standards of the community-wide HMIS reporting tool for City of Erie rapid re-housing participants.
- Subrecipient must consistently apply the same standards for all program participants.
- Subrecipients must follow all written standards listed in this section 6 (a) in accordance with regulations.

The subrecipient must use the standard Part 5 form to determine the participant's initial income. Income may not exceed 30% of the area median income.

The subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 12 months for participants receiving rapid re-housing assistance. Each re-evaluation must establish that:

- The participant does not have an annual income that exceeds 30 percent of median family income for the area.
- The participant lacks sufficient resources and support networks necessary to retain housing.

(Note: This will not affect most participants as assistance is limited to a security deposit and the first three months rent.)

The subrecipient may require each program participant to notify the subrecipient regarding changes in their income or other circumstances that affect the need for assistance under ESG. When notified of a relevant change, the subrecipient must re-evaluate the participant's eligibility and the amount and types of assistance the participant needs.

The subrecipient must assist each program participant, as needed, to obtain:

- Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living, and
- Other Federal, State, local and private assistance available to assist the participant in obtaining housing stability, including:
 - 1) Medicaid
 - 2) Supplemental Nutrition Assistance Program (7 CFR Parts 271-283)
 - 3) Women, Infants and Children (WIC) (7 CFR Part 246)
 - 4) Federal-State Unemployment Insurance Program (20 CFR Parts 601-603, 606, 609, 614-617, 625, 640, 650)
 - 5) Social Security Disability Insurance (SSDI) (20 CFR Part 404)

- 6) Supplemental Security Income (SSI) (20 CFR Part 416)
- 7) Child and Adult Care Food Program (42 U.S.C. 1766(t)(7 CFR Part 226))
- 8) Other assistance available under the programs listed in §576.400(c)

Additionally, policies and procedures must also be consistent with the definitions of homelessness at 24 CFR 576.2 and the recordkeeping requirements of 24 CFR 576.500 (b), (c), (d), and (e). (See Attachment C.)

b.) Policies and procedures for coordinating among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing providers, other homeless assistance providers, and mainstream service and housing providers.

Coordination among agencies will be directed by the Erie CoC. Referrals for services must come from CoC members. In order to obtain services, clients must sign a release of information form so the referring agency may release files to the Rapid Re-housing provider. Members that refer clients must continue providing the services they were providing at the time of the referral up until the client secures housing. CoC members will evaluate the affects of the program and report problems or concerns at the CoC general membership meeting which meets every other month.

Coordination with the CoC membership integrates the proposed program with other homeless programs and mainstream housing and service providers listed in 576.400 (b) and (c) through its diverse membership. (These regulations were included in the requirements stated in 6(a) above.)

c.) Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families /individuals will receive rapid-re-housing assistance.

The second allocation of funding for FY2011 will primarily be used for rapid re-housing. In order to be referred for rapid re-housing services, the CoC referring agency must complete the following steps:

- 1.) Secure participant's required source documentation for income, and
- 2.) Secure required source documentation for homelessness, and
- 3.) Obtain required demographics, and
- 4.) Complete a Part 5 and ensure participant is at or below 30% of area median income (only these clients can be referred on), and
- 5.) Secure a Release of Information Between Rapid Re-Housing Partnering Agencies form for client.

The second allocation will also be primarily used to assist "newly homeless" individuals/families. Newly homeless is defined as:

- 1.) Clients that are homeless and have not received homeless assistance services in the prior 12 months; or

- 2.) Clients who are within 14 days of losing their primary nighttime residence and will be going to the street, car or a shelter; or
- 3.) Clients who may have received assistance within the past 12 months, but their situation has changed and their CoC case worker feels they now will benefit from the rapid re-housing service. This condition will require a waiver from three CoC executive committee members of which one member must be the Erie County representative and one member must be the City of Erie representative.
- 4.) Funding MAY NOT be used to keep participants in their current housing. It must be used to pay a portion of the security deposit and up to three months rent on a new housing unit. Any deviation from this standard will require a waiver from three CoC executive committee members of which one member must be the Erie County representative and one member must be the City of Erie representative.

If the participant meets all of the requirements above, the referring agency may then schedule an appointment for their client with the rapid re-housing provider and share information with that provider. Documentation for each client must be maintained for a minimum of five years after the grant term has expired.

d.) Standards for determining the share of rent and utility costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance. The written standards must include guidelines for determining a program participant's contribution to rent and utilities.

Clients must provide \$100 of the security deposit in order to receive assistance. The program will pay the balance of the security deposit and up to three month's rent for the participant. The portion of the rent to be paid will be determined by the rapid re-housing provider staff. Factors to consider in determining the amount of rent to be paid will be as follows:

- The monthly rent amount
- The client's current assets
- The client's current monthly income
- Any changes in the client's income, employment, status while receiving assistance
- The overall demand of the program
- Other assistance the participant is receiving (total monthly assistance the participant is receiving from all sources shall never exceed the total monthly rent)

e.) The written standards for determining the length and amount of assistance a participant will receive, as well as, changes in assistance amounts over time.

Assistance for this program provides for the partial payment of a security deposit and up to a maximum of three months rent. Clients will be required to inform the rapid re-housing provider if their status changes, and additional evaluations may be requested.

Typically, clients receive one evaluation only, as none will exceed the regulatory one-year period.

f.) The written standards for determining the housing stabilization and/or relocation services that will be provided to a participant, including the types of services, amount of services, and length of time a participant can receive services.

Participants may receive funding for the partial payment of a security deposit and up to three months rent one time. Once the participant receives funding for a security deposit, he/she is ineligible to receive funding for another security deposit or rent on a different unit. The participant can receive a waiver one time to this requirement if he/she did not secure or remain in housing though no fault of their own. This condition will require a waiver from three CoC executive committee members of which one member must be the Erie County representative and one member must be the City of Erie representative. The maximum amount any client can receive is \$2,000, however this amount should not be considered the normal amount. The caseworker must review the amount of the required security deposit and accompanying three months rent for cost reasonableness.

The City of Erie will use the written standards stated above as initial guidelines for the ESG grant and will continue to refine these standards as the community, and in particular the CoC, adapts and further develops strategies and new best practices.

An updated version of the ESG Written Standards/Guidelines are attached. (See **Attachment E.**) These Guidelines will continue to be reviewed and updated by the CoC.

7. Making Sub-Awards

This is in regard to the sub-award of the second allocation of Emergency Solutions Grant (ESG) Funding allocated to the City of Erie for Fiscal Year 2011. City staff discussed the allocation of the additional funding, the performance standards, and the development of policies and procedures for the additional funding at the Continuum of Care (CoC) housing committee on February 24, 2012; the CoC Executive Committee on March 5, 2012; and the CoC general membership meeting on Thursday March 8th, 2012. The City discussed both the selection of a subrecipient to provide services and the solicitation of proposals through a request for proposal (RFP). In both instances, it was agreed a sole provider should be selected/procured for the delivery of the additional rapid re-housing services. It was stated that the provider would need proficiency in the following areas:

- 1.) partnering with CoC members to receive referrals,
- 2.) providing case management services to rapid re-housing recipients,
- 3.) documenting recipient files in compliance with ESG regulations, and
- 4.) disbursing financial assistance for client security deposits and rent.

Because of the importance and nature of these provisions and due to limited funding, the City has decided to contract with a current subrecipient who has experience in all areas.

The subrecipient selected to deliver these services is GECAC. GECAC has both the capacity and experience to deliver services in an efficient and timely manner.

8. Homeless Participation Requirement

City must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policymaking entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services or other assistance that receives ESG funding.

The City consulted with the CoC general membership regarding the allocation of the additional FY2011 funding, the performance standards, and the policies and procedures. The CoC requires at least two formerly homeless representatives in their membership, and currently, three formerly homeless individuals are members. At least one of those formerly homeless individuals was an active participant in the March 8th, 2012 meeting and discussions.

The City will continue to require a homeless or a formerly homeless CoC member review future updates. Should that individual be absent from a review by any of the CoC committees, the City will seek this individual's input in addition to the CoC input.

9. Performance Standards

City must describe the performance standards for evaluating ESG activities.

The City will require tracking of the following performance standards for the additional funding:

1. The number of individuals and families that secure housing through the use of the rapid re-housing partial security deposit and first three months rent.
2. The number of months that the individual/family was homeless before receiving the rapid re-housing funding,
3. The number of exceptions to the rules granted by the executive committee and the conditions/reasons for the exception, and
4. The number of individuals/families that received rapid re-housing assistance because they were within 21 days of losing their primary nighttime residence versus the number of individuals/families that were already without a primary nighttime residence.

It is believed that tracking these performance indicators will ensure efficient evolution of the standards in the future.

10. Certifications – 24 CFR 91.225 (c), 91.325(c)

See attached certifications.

Other Requirements:

The City of Erie will not allocate any funding from the second ESG allocation of Fiscal Year 2011 to emergency shelter or street outreach. Therefore the additional written standard requirements under 24 CFR 576.400 do not apply.

The City of Erie ESG subrecipients use HMIS and will continue to use this system. The Rapid Re-Housing provider, GECAC, also uses the centralized HMIS system.

The City of Erie's current monitoring procedures are sufficient to allow City staff to monitor compliance with the new requirements.

CERTIFICATIONS

CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

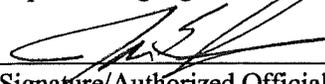
Anti-Lobbying -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

Authority of Jurisdiction -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.



Signature/Authorized Official

5/7/12

Date

Mayor

Title

Specific CDBG Certifications

The Entitlement Community certifies that:

Citizen Participation -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

Community Development Plan -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

Following a Plan -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

Use of Funds -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) 2011, 2012, and 2013, (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

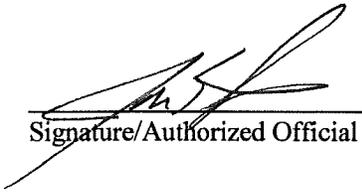
jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

Compliance With Anti-discrimination laws -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

Lead-Based Paint -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

Compliance with Laws -- It will comply with applicable laws.



Signature/Authorized Official

5/7/12
Date

Mayor
Title

THIS CERTIFICATION DOES NOT APPLY

**OPTIONAL CERTIFICATION
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

Signature/Authorized Official

Date

Title

Specific HOME Certifications

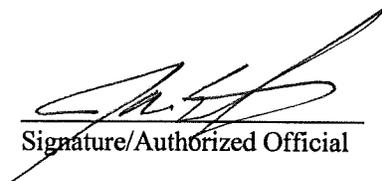
The HOME participating jurisdiction certifies that:

Tenant Based Rental Assistance -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

Eligible Activities and Costs -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

Appropriate Financial Assistance -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;



Signature/Authorized Official

5/7/12
Date

Mayor
Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

Essential Services and Operating Costs – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

Renovation – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

Supportive Services – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal State, local, and private assistance available for such individuals.

Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

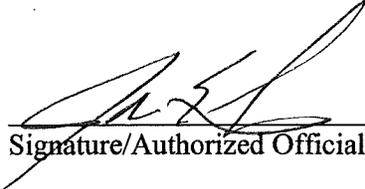
Confidentiality – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

Homeless Persons Involvement – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.



Signature/Authorized Official

5/7/12

Date

Mayor

Title

THIS CERTIFICATION DOES NOT APPLY

HOPWA Certifications

The HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Municipal Building, 626 State Street, Erie, PA 16501

Check if there are workplaces on file that are not identified here.

This information with regard to the drug-free workplace is required by 24 CFR part 21.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

ATTACHMENTS

**COC HOUSING COMMITTEE CONSULTATION
EMERGENCY SOLUTIONS GRANT
2/24/12**

On 2/24/12, the COC Housing Sub-Committee met to discuss the following:

- Discussed the program parameters. It was suggested ESG pay for a portion of the deposit and for up to three months rent for clients.
- It was suggested that clients be required to pay \$100 toward their security deposit in order to make sure they had a vested interest in the housing.
- The Housing Committee suggested either ESG recipients alone, or ESG and Home Team Agencies should make client referrals.
- The Committee discussed whether individual ESG providers or a sole provider should deliver rapid re-housing funds. It was the consensus that a sole provider would be more feasible.
- Topics will once again be discussed at the Home team General Meeting on March 8, 2012.
- A special CoC Executive Committee Meeting will be scheduled to obtain more input.

**COC EXECUTIVE COMMITTEE CONSULTATION
EMERGENCY SOLUTIONS GRANT
3/5/12**

On 3/5/12, the COC Executive Committee met to discuss the following:

- Discussed the program parameters. It was suggested ESG pay first month rent and deposit. (Another suggestion was to pay ½ rent for two months. A third suggestion was to pay deposit, first month rent, ½ of second month rent, and 1/3 of third month rent. It was also discussed that this might be too costly to deliver. It might be more cost efficient to limit services to a deposit and first month rent).
- Limit total client funding to \$750.
- Requirements for clients:
 - Have income
 - Do not require extensive support services
 - Have become homeless through no fault of their own (lost job, domestic abuse, fire victim)
- The Executive Committee suggested only ESG recipients should make referrals. Debra Smith asked about other HOME Team agencies such as Veteran's Assistance; however, the consensus seemed to be to remain with ESG recipients.
- Discussed the performance standards and committee members seemed to agree that HUD's Decent Housing and Suitable Living Conditions seemed appropriate. It was also decided that clients should track the number of months the individual family was homeless, along with the number of families/individuals that secure housing.
- Discussed the funding policies and procedures for the operation and administration of the HMIS System. Executive Committee members felt the addition of a Release of Information form (digital) would be the only addition to the current policies and administration. All other current policies could be adopted.
- The 2008 Government Standards for HMIS will apply until the 2011 rules go into effect by the Revised Final Rule.
- Discussed whether individual ESG providers or a sole provider should deliver rapid re-housing funds. It was the consensus that a sole provider would be more feasible. Additional data entry would be manageable.
- Topics will once again be discussed at the Home Team General Meeting on Thursday, March 8, 2012.

**CoC GENERAL ADMINISTRATION
EMERGENCY SOLUTIONS GRANT
3/8/12**

On 3/8/12, Debra Smith and Cyndie Zahner distributed the Consultation with the Continuum of Care (CoC) information sheet of 3/5/12 and the Consultation with Citizens Information Sheet of 3/6/12. The following issues were discussed:

- A description of the program was explained by Debra Smith.
- The City is considering funding a portion of the security deposit and up to three months rent for newly homeless individuals/families with the requirement that families pay the first \$100 of the security deposit. (It was suggested by the Housing Committee that individuals/families should pay a portion of that security deposit).
- The performance standards were revealed by Cyndie Zahner. The objections will be decent housing and a suitable living environment. The number of families/individuals that secure housing will be tracked along with the number of months individuals/families were homeless. Policies and procedures will be developed from the current system. CoC current policies and procedures will be forwarded to the City for an example.
- Members agreed with the basis of the program, performance standards of the procedures for devising the policies, procedures exclusion and the team member said she did not like that.
- Team members suggested there be a universal form for the release so that all agencies had the same form.
- Team members questioned if Emergency Solutions recipients or all HOME Team members could make referrals. It was stated that any HOME Team member could make a referral.
- The Team discussed verifying a client's eligibility, and it was agreed the sole provider of the rapid re-housing funds would have to make the final determination.
- Clients would have to provide pay stubs and self-certification statements.
- It was stated that funding should not go to clients that had any on-going problems.
- It was determined that a signed release would allow the provider of the rapid re-housing funds access to clients' HMIS file.

**Consultation with Citizens
for the Substantial Amendment to the City of Erie FY 2011 Consolidated Plan
For Review 3/6/12**

The purpose of the Homeless Assistance Program is to reduce the incidence of homelessness in Continuum of Care (COC) communities by assisting homeless individuals and families in quickly transitioning to self-sufficiency and permanent housing as authorized under Title IV of the McKinney-Vento Homeless Assistance Act.

City of Erie staff consulted with the COC Housing Sub-committee on Friday, February 24, 2012 regarding the additional Emergency Solution Grant Funding for the FY2011 Plan. At that time the City accepted comments regarding how to allocate ESG funds for eligible activities.

The amount of the funding is \$87,148. The allocation is limited to the following activities:

- Rapid Re-housing – Rental Assistance
- Rapid Re-housing – Housing relocation and stabilization services
- HMIS
- Homeless Prevention – Rental
- Homeless Prevention – Housing relocations and stabilization services
- Administration

HUD strongly encouraged jurisdictions to focus much of its new ESG funding on rapidly re-housing individuals/families living on the streets or in emergency shelters. The COC Housing Sub-Committee made the further suggestion that funding be used for rapid re-housing of newly homeless individuals/families.

The City is therefore considering allocating the additional funding for rapid re-housing and targeting newly homeless individuals or families. Funds would pay a portion of the client's security deposit and up to the first three months rent. Individuals/families would be required to pay a portion of the security deposit as was suggested by the COC Housing Sub-Committee.

It is believed that assistance with the security deposit and first month's rent will help individuals/families secure decent housing. Funding up to an additional two months rent will alleviate housing costs, so clients can concentrate on other incidental costs, making for more suitable living conditions. It is hopeful by paying these costs families will be more likely to sustain permanent housing.

The City discussed the allocation of ESG funds; the development of performance standards for activities funded under ESG; and the development of funding, policies and procedures for the operation and administration of ESG funds on Monday, March 5th at the COC Executive Committee meeting and will continue these discussions at the General COC HOME team meeting on Thursday, March 8, 2012.

Comments will also be accepted on March 6th at the City's Public Needs Hearing for the proposed 2012 Third Annual Plan and for the proposed Substantial Amendment to the 2011 Annual Consolidated Plan as well as on Thursday March 8th. Additionally, comments may be mailed to **City of Erie, DECD Room 404, 626 State St., Erie, PA 16501** during the 30-day comment period beginning March 15th, 2012.

Consultation with the Continuum of Care (COC)
for the Substantial Amendment to the City of Erie FY 2011 Consolidated Plan
For Review 3/5/12

The City of Erie consulted with the COC Housing Sub-committee on February 24, 2012 regarding the additional Emergency Solution Grant Funding they received for the FY2011 Plan. At that time the City accepted comments regarding how to allocate ESG funds for eligible activities. The City would like to continue discussions with the Executive Committee on Monday, March 5th. Comments will also be accepted on March 6th at the City of Erie Needs/Proposed Use of Funds Public Hearing at City Council Chambers as well as on Thursday March 8th at the General COC HOME Team meeting. Additionally, comments will be accepted for a 30 day period beginning March 15th.

The amount of the funding is \$87,148. This allocation is limited to the following activities:

- Rapid Re-housing – Rental Assistance
- Rapid Re-housing – Housing relocation and stabilization services
- HMIS
- Homeless Prevention – Rental
- Homeless Prevention – Housing relocations and stabilization services

The housing sub committee of the COC suggested the additional funding be used for the rapid re-housing of newly homeless individuals/families. (HUD has strongly encouraged jurisdictions to focus as much of its new ESG funding on rapidly re-housing individuals and families living on the streets or in emergency shelters.)

We are requesting your comments on this topic along with two additional topics:

1. Determine how to allocate ESG funds (Newly Homeless as per COC Housing Committee.)
2. Develop performance standards
3. Develop funding policies and procedures for the operation and administration of the HMIS

The City is considering funding a portion of the security deposit and up to three months rent for newly homeless individuals/families with the requirement that families pay the first \$100 of the security deposit. (It was suggested by the Housing Committee that individuals/families should pay a portion of that security deposit.)

The performance standards the City is suggesting are Decent Housing/Suitable Living. This would be reported by listing the number of families that secure housing and number of months spent homeless. It is believed that the payment of a portion of the security deposit will assist individuals/families in securing decent housing and paying the first few months rent will alleviate initial housing costs, so clients can concentrate on other incidental costs, making more suitable living conditions. It is hopeful by paying these costs families will be more likely to sustain permanent housing.

Strong consideration is being given to subcontracting with a sole provider for the disbursement of the additional \$87,148. Client referrals to the program will be taken from ESG subrecipients and COC HOME Team members. One other consideration that was discussed, was allocating a portion of the \$87,148 to current ESG subrecipients. It was decided since the funding was so limited, a sole provider would be more cost effective.

CPMP Version 2.0

Grantee Name: **City of Erie**

Project Name: ESG Administration						
Description:	IDIS Project #: ESG-Administration UOG Code: PA422178 ERIE					
Funds for administration of the Emergency Shelter/Solutions Grant (ESG) Program. Updated 6/7/11. Added \$10,408 to \$7,746 for a total of \$18,154 administrative costs or 7.5% of the total \$242,078 as per the substantial amendment. Revised 7/1/12.						
Location: 626 State Street	Priority Need Category Select one: Planning/Administration ▼					
Expected Completion Date: 6/30/2013	Explanation: Emergency Shelter Grant Administration					
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Primary Purpose is to help the homeless					
Outcome Categories <input type="checkbox"/> Availability/Accessibility <input checked="" type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	Specific Objectives 1. _____ ▼ 2. _____ ▼ 3. _____ ▼					
Project-level Accomplishments	11 Public Facilities ▼	Proposed	9	Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	11 Public Facilities ▼	Proposed	9	Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
Proposed Outcome		Performance Measure		Actual Outcome		
Administration of ESG Programs						
21A General Program Administration 570.206 ▼		Matrix Codes ▼				
Matrix Codes ▼		Matrix Codes ▼				
Matrix Codes ▼		Matrix Codes ▼				
Program Year 1	ESG ▼	Proposed Amt.	\$7,817	Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	11 Public Facilities ▼	Proposed Units	9	Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Program Year 2	ESG	▼	Proposed Amt.	\$18,154	Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	11 Public Facilities	▼	Proposed Units	9	Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
Program Year 3	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
Program Year 4	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
Program Year 5	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	

CPMP Version 2.0

Grantee Name: **City of Erie**

Project Name: ESG - Rapid Re-Housing						
Description:	IDIS Project #: ESG-RR UOG Code: PA422178 ERIE					
Funds for rapid rehousing services. Costs may include security deposit, rent or other incidental costs of housing homeless individuals/families along with delivery. Added 7/1/12.						
Location:	Priority Need Category					
City of Erie	Select one: <input type="text" value="Other"/> ▼					
Expected Completion Date:	Explanation:					
6/30/2013	Emergency Shelter Grant					
Objective Category	Primary Purpose is to help the homeless					
<input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives					
Outcome Categories	1. Increase the number of homeless persons moving into permanent housing ▼					
<input checked="" type="checkbox"/> Availability/Accessibility	2. _____ ▼					
<input type="checkbox"/> Affordability	3. _____ ▼					
<input type="checkbox"/> Sustainability						
Project-level Accomplishments	01 People ▼	Proposed 50		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	04 Households ▼	Proposed 25		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
Proposed Outcome	Performance Measure	Actual Outcome				
Provide rapid rehousing services to 50 participants in approximately 25 households	People					
05Q Subsistence Payments 570.204 ▼	Matrix Codes ▼	Matrix Codes ▼				
Matrix Codes ▼	Matrix Codes ▼	Matrix Codes ▼				
Matrix Codes ▼	Matrix Codes ▼	Matrix Codes ▼				
Program Year 1	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Fund Source: ▼	Proposed Amt.		Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Program Year 2	ESG	▼	Proposed Amt.	\$76,740	Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	01 People	▼	Proposed Units	50	Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
04 Households	▼	Proposed Units	25	Accompl. Type:	▼	Proposed Units		
		Actual Units				Actual Units		
Program Year 3	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units		
		Actual Units				Actual Units		
Program Year 4	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units		
		Actual Units				Actual Units		
Program Year 5	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Fund Source:	▼	Proposed Amt.		Fund Source:	▼	Proposed Amt.	
			Actual Amount				Actual Amount	
	Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units	
			Actual Units				Actual Units	
Accompl. Type:	▼	Proposed Units		Accompl. Type:	▼	Proposed Units		
		Actual Units				Actual Units		

CITY OF ERIE
SECTION 6 – SUBSTANTIAL AMENDMENT ATTACHMENT
24 CFR 576.2/24 CFR 576.500(b)(c)(d)(e)

Subpart C—Award and Use of Funds

§ 576.200 Submission requirements and grant approval.

(a) *Application submission and approval.* In addition to meeting the application submission requirements in 24 CFR part 5, subpart K, each State, urban county, or metropolitan city must submit and obtain HUD approval of a consolidated plan in accordance with the requirements in 24 CFR part 91, and each territory must submit and obtain HUD approval of a consolidated plan in accordance with the requirements that apply to local governments under 24 CFR part 91. As provided under 24 CFR 85.12, HUD may impose special conditions or restrictions on a grant, if the recipient is determined to be high risk.

(b) *Amendments.* The recipient must amend its approved consolidated plan in order to make a change in its allocation priorities; make a change in its method of distributing funds; carry out an activity not previously described in the plan; or change the purpose, scope, location, or beneficiaries of an activity. The amendment must be completed and submitted to HUD in accordance with the requirements under 24 CFR 91.505.

§ 576.201 Matching requirement.

(a) *Required amount of matching contributions.* (1) Except as provided under paragraphs (a)(2) and (a)(3) of this section, the recipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the amount of ESG funds provided by HUD.

(2) If the recipient is a State, the first \$100,000 of the fiscal year grant is not required to be matched. However, the recipient must transfer the benefit of this exception to its subrecipients that are least capable of providing the recipient with matching contributions.

(3) This matching requirement does not apply if the recipient is a territory.

(b) *Eligible sources of matching contributions.* (1) Subject to the requirement for States under paragraph (a)(2) of this section, the recipient may require its subrecipients to make matching contributions consistent with this section to help meet the recipient's matching requirement.

(2) Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local, and private sources. However, the following requirements apply to matching contributions from a Federal source of funds:

(i) The recipient must ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match Emergency Solutions Grant (ESG) funds.

(ii) If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the matching requirements under this section.

(c) *Recognition of matching contributions.* (1) In order to meet the matching requirement, the matching contributions must meet all requirements that apply to the ESG funds provided by HUD, except for the expenditure limits in §576.100.

(2) The matching contributions must be provided after the date that HUD signs the grant agreement.

(3) To count toward the required match for the recipient's fiscal year grant, cash contributions must be expended within the expenditure deadline in §576.203, and noncash contributions must be made within the expenditure deadline in §576.203.

(4) Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant.

(5) Contributions that have been or will be counted as satisfying a matching requirement of another Federal grant or award may not count as satisfying the matching requirement of this section.

(d) *Eligible types of matching contributions.* The matching requirement may be met by one or both of the following:

(1) *Cash contributions.* Cash expended for allowable costs, as defined in OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR part 230), of the recipient or subrecipient.

(2) *Noncash contributions.* The value of any real property, equipment, goods, or services contributed to the recipient's or subrecipient's ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building.

(e) *Calculating the amount of noncash contributions.* (1) To determine the value of any donated material or building, or of any lease, the recipient must use a method reasonably calculated to establish the fair market value.

(2) Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipient's organization. If the recipient or subrecipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

(3) Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or

subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

(f) *Costs paid by program income.* Costs paid by program income shall count toward meeting the recipient's matching requirements, provided the costs are eligible ESG costs that supplement the recipient's ESG program.

§ 576.202 Means of carrying out grant activities.

(a) *States.* If the recipient is a State, the recipient may use an amount consistent with the restrictions in §576.100 and §576.108 to carry out administrative activities through its employees or procurement contracts. If the recipient is a State, and has been identified as the HMIS lead by the Continuum of Care, the State may use funds to carry out HMIS activities set forth in §576.107(a)(2). The recipient must subgrant the remaining funds in its fiscal year grant to:

(1) Units of general purpose local government in the State, which may include metropolitan cities and urban counties that receive ESG funds directly from HUD; or

(2) Private nonprofit organizations, provided that for emergency shelter activities the recipient obtains a certification of approval from the unit of general purpose local government for the geographic area in which those activities are to be carried out.

(b) *Recipients other than States; subrecipients.* The recipient, if it is not a State, and all subrecipients may carry out all eligible activities through their employees, procurement contracts, or subgrants to private nonprofit organizations. If the recipient is an urban county, it may carry out activities through any of its member governments, so long as the county applies to its members the same requirements that are applicable to local government subrecipients under this part.

§ 576.203 Obligation, expenditure, and payment requirements.

(a) *Obligation of funds.* (1) *Funds allocated to States.* (i) Within 60 days from the date that HUD signs the grant agreement with the State (or grant amendment for reallocated funds), the recipient must obligate the entire grant, except the amount for its administrative costs. This requirement is met by a subgrant agreement with, or a letter of award requiring payment from the grant to, a subrecipient.

(ii) Within 120 days after the date that the State obligates its funds to a unit of general purpose local government, the subrecipient must obligate all of those funds by a subgrant agreement with, or a letter of award requiring payment to, a private nonprofit organization; a procurement contract; or the written designation of a department within the government of the subrecipient to directly carry out an eligible activity.

(2) *Funds allocated to metropolitan cities, urban counties, and territories.* Within 180 days after the date that HUD signs the grant agreement (or a grant amendment for reallocation of funds) with the metropolitan city, urban county, or territory, the recipient must obligate all the grant

amount, except the amount for its administrative costs. This requirement is met by an agreement with, or a letter of award requiring payment to, a subrecipient; a procurement contract; or a written designation of a department within the government of the recipient to directly carry out an eligible activity. If the recipient is an urban county, this requirement may also be met with an agreement with, or letter of award requiring payment to, a member government, which has designated a department to directly carry out an eligible activity.

(b) *Expenditures.* The recipient must draw down and expend funds from each year's grant not less than once during each quarter of the recipient's program year. All of the recipient's grant must be expended for eligible activity costs within 24 months after the date HUD signs the grant agreement with the recipient. For the purposes of this paragraph, expenditure means either an actual cash disbursement for a direct charge for a good or service or an indirect cost or the accrual of a direct charge for a good or service or an indirect cost.

(c) *Payments to subrecipients.* The recipient must pay each subrecipient for allowable costs within 30 days after receiving the subrecipient's complete payment request. This requirement also applies to each subrecipient that is a unit of general purpose local government.

Subpart F—Grant Administration

§ 576.500 Recordkeeping and reporting requirements.

(b) *Homeless status.* The recipient must maintain and follow written intake procedures to ensure compliance with the homeless definition in §576.2. The procedures must require documentation at intake of the evidence relied upon to establish and verify homeless status. The procedures must establish the order of priority for obtaining evidence as third-party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers are acceptable evidence of third-party documentation and intake worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

(1) If the individual or family qualifies as homeless under paragraph (1)(i) or (ii) of the homeless definition in §576.2, acceptable evidence includes a written observation by an outreach worker of the conditions where the individual or family was living, a written referral by another housing or service provider, or a certification by the individual or head of household seeking assistance.

(2) If the individual qualifies as homeless under paragraph (1)(iii) of the homeless definition in §576.2, because he or she resided in an emergency shelter or place not meant for human habitation and is exiting an institution where he or she resided for 90 days or less, acceptable evidence includes the evidence described in paragraph (b)(1) of this section and one of the following:

ATTACHMENT C

(i) Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or

(ii) Where the evidence in paragraph (b)(2)(i) of this section is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph (b)(2)(i) and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.

(3) If the individual or family qualifies as homeless under paragraph (2) of the homeless definition in §576.2, because the individual or family will imminently lose their housing, the evidence must include:

(i)(A) A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;

(B) For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or

(C) An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either: (I) be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or (II) if the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete;

(ii) Certification by the individual or head of household that no subsequent residence has been identified; and

(iii) Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

(4) If the individual or family qualifies as homeless under paragraph (3) of the homeless definition in §576.2, because the individual or family does not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal

statute or section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), the evidence must include:

(i) For paragraph (3)(i) of the homeless definition in §576.2, certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable;

(ii) For paragraph (3)(ii) of the homeless definition in §576.2, referral by a housing or service provider, written observation by an outreach worker, or certification by the homeless individual or head of household seeking assistance;

(iii) For paragraph (3)(iii) of the homeless definition in §576.2, certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60-day period immediately preceding the date of application for homeless assistance, including: recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or, where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records. Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address; and

(iv) For paragraph (3)(iv) of the homeless definition in §576.2, written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who is licensed by the state to diagnose and treat that condition); employment records; department of corrections records; literacy, English proficiency tests; or other reasonable documentation of the conditions required under paragraph (3)(iv) of the homeless definition.

(5) If the individual or family qualifies under paragraph (4) of the homeless definition in §576.2, because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other housing. If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker.

Otherwise, the oral statement that the individual or head of household seeking assistance has not identified a subsequent residence and lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain housing must be documented by a certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

(c) *At risk of homelessness status.* For each individual or family who receives Emergency Solutions Grant (ESG) homelessness prevention assistance, the records must include the evidence relied upon to establish and verify the individual or family's "at risk of homelessness" status. This evidence must include an intake and certification form that meets HUD specifications and is completed by the recipient or subrecipient. The evidence must also include:

(1) If the program participant meets the criteria under paragraph (1) of the "at risk of homelessness" definition in §576.2:

(i) The documentation specified under this section for determining annual income;

(ii) The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; *e.g.*, family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in §576.2;

(iii) The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition. Acceptable evidence includes:

(A) Source documents (*e.g.*, notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);

(B) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, former employer, public administrator, relative) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of "at risk of homelessness" in §576.2; or

(C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; and

(iv) The most reliable evidence available to show that the program participant meets one or more of the conditions under paragraph (1)(iii) of the definition of "at risk of homelessness" in §576.2. Acceptable evidence includes:

(A) Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (*e.g.*, eviction notice, notice of termination from employment, bank statement);

(B) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of "at risk of homelessness"; or

(C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; or

(2) If the program participant meets the criteria under paragraph (2) or (3) of the "at risk of homelessness" definition in §576.2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.

(d) *Determinations of ineligibility.* For each individual and family determined ineligible to receive Emergency Solutions Grant (ESG) assistance, the record must include documentation of the reason for that determination.

(e) *Annual income.* For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

(1) Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or subrecipient; and

ATTACHMENT C

(2) Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (*e.g.*, wage statement, unemployment compensation statement, public benefits statement, bank statement);

(3) To the extent that source documents are unobtainable, a written statement by the relevant third party (*e.g.*, employer, government benefits administrator) or the written certification by the recipient's or subrecipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or

(4) To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

3/26/2012



Providing shelter, help and hope

www.communityshelter.org

Kathleen Cancilla, Executive Director

3/16/12

Brenda Sandberg
 City of Erie
 Department of Economic and Community Development
 626 State Street Room 404
 Erie, Pa. 16501

Dear Brenda,

This letter is intended to express Community Shelter Services interest in administering the Homeless Prevention and Rapid Re-housing (HPRP) program discussed at the March 8th Home Team Meeting. HPRP is a valuable weapon in our community's fight to prevent homelessness, assisting those who become homeless find safe, affordable housing quickly. Community Shelter Services has been operating our HPRP program since January of 2009. We look forward to the opportunity to continue the work we have already started. We anxiously await the release of the City's Request for Proposal for the new HPRP program being funded through the emergency Solutions Grant. Thank you.

Sincerely,

Patrick Herr M.S.W, LSW

cc: Debra Smith
 Dave Deter
 Cyndie Zahner

The City of Erie, Pennsylvania

Joseph E. Sinnott, Mayor



May 5, 2012

Mr. Pat Herr
Community Shelter Services
655 West 16th Street
Erie, PA 16502

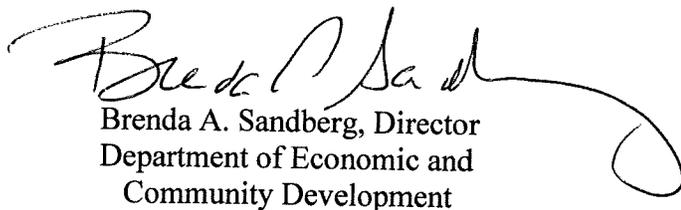
Dear Mr. Herr:

This correspondence is in reference to your comments made at the Public Hearing on March 6, 2012 and your letter dated March 16, 2012 expressing Community Shelter Services' interest in administering the Emergency Solutions Program (ESG).

While the City of Erie values the work that was done by your agency in administering the Homeless Prevention and Rapid Re-housing (HPRP) Program, the City has chosen to select GECAC to administer the ESG Program. They have both the capacity and experience in all of the areas that were mentioned in the memo to the HOME Team dated March 30, 2012.

The City is grateful for all the services Community Shelter Services is providing, and hopes to continue its amicable relationship in the future.

Sincerely,



Brenda A. Sandberg, Director
Department of Economic and
Community Development

BAS:smd

cc: Dave Deter
Debra Smith
Cyndie Zahner

Brenda A. Sandberg • Director - Department of Economic & Community Development

626 State Street - Room 404 • Erie, PA 16501 • Voice 814.870.1270 - Fax 814.870.1443 • ecd@erie.pa.us



The Flagship City

Erie, Pa

EMERGENCY SOLUTIONS GRANT GUIDELINES

Updated 4/30/2012

**(WRITTEN STANDARDS FOR
PROVIDING ASSISTANCE)**

Introduction

The City of Erie is a direct entitlement under the Emergency Solutions Grant (ESG) as established under the McKinney-Vento Homeless Act, as amended by the Homeless Emergency and Rapid Transition Housing Act of 2009.

The City distributed Emergency Solutions (ESG) funding to the following Emergency Shelter and Transitional Housing facility providers:

- Community Shelter Services
- SafeNet
- Mercy Center for women
- City Mission
- The Refuge
- Community of Caring
- St. Patrick's Haven

The City has built partnerships with these providers over the past 10 years, and requests each provider apply for continued funding annually. Applications are by request only.

The City also selected a Rapid Re-housing provider that has ample experience delivering case management services and disbursing financial assistance to clients.

All subrecipients are required to be members of the CoC.

Currently, the City allocates funding to the Emergency Shelter/Transitional facility providers by the number of beds each facility had during FY2007. This process is currently being reviewed, and may be updated for the next fiscal allocation.

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EMERGENCY SOLUTIONS GRANT WRITTEN STANDARDS

I. Evaluation of Eligibility

Emergency Shelter and Transitional Housing Homeless Assistance

Individual shelters and transitional facilities will develop their own intake guidelines for applicants. However, at a minimum, their guidelines must ensure conditions stated in this section.

In order to receive Emergency Solutions (ESG) assistance at Emergency Shelters or Transitional Facilities, agencies must complete the following steps:

- 1) The subrecipient must conduct an initial evaluation to determine if each individual or family is eligible for ESG assistance and what amount and type of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under §576.400(d) and the written standards established under §576.400(e). 24 CFR 576.4 makes the following requirements:
 - Subrecipient must use the standards of the community-wide HMIS reporting tool for participants. (Providers for victims exempt).
 - Subrecipients must consistently apply the same standards for all program participants.
 - Subrecipients must follow all written standards listed in this section in accordance with regulations.

- 2) The subrecipient must obtain the appropriate required **homeless documentation** and the appropriate required **income documentation** to determine the participant's initial income. Income may not exceed 30% of the area median income. (See Section II for required homeless documentation.)

- 3) Additionally, individual subrecipients will assess and prioritize the essential needs of all clients and must make the appropriate recommendations and/or referrals. (See Section V, Coordination among Agencies.)

Rapid Re-Housing Recipients

Rapid Re-Housing recipients must be referred to the Rapid Re-Housing provider by Continuum of Care (CoC) agencies. In order to be referred, the CoC referring agency must complete the following steps:

- 1.) Secure participant's required source documentation for income,
- 2.) Secure required source documentation for homelessness,
- 3.) Obtain required demographics,
- 4.) Complete the appropriate required income form to ensure participant is at or below 30% of area median income, and

- 5.) Secure the required Release of Information Between Rapid Re-Housing Partnering Agencies form for client.

Rapid Re-Housing assistance will also be used primarily to assist "newly homeless" individuals/families. Newly homeless is defined as:

- 1.) Clients that are homeless and have not received homeless assistance services in the prior 12 months; or
- 2.) Clients who are within 21 days of losing their primary nighttime residence and will be going to the street, car or a shelter; or
- 3.) Clients who may have received assistance within the past 12 months, but their situation has changed and their CoC case worker feels they now will benefit from the rapid re-housing service. This condition will require a waiver from three CoC executive committee members of which one member must be the Erie County representative and one member must be the City of Erie representative.

Note: Funding MAY NOT be used to keep participants in their current housing. It must be used to pay a portion of the security deposit and up to three months rent on a new housing unit. Any deviation from this standard will require a waiver from three CoC executive committee members of which one member must be the Erie County representative and one member must be the City of Erie representative.

If the participant meets all of the requirements above, the referring agency may then refer client to the rapid re-housing provider and share information with that provider. Documentation for each client must be maintained for a minimum of five years after the grant term has expired.

For the Rapid Re-Housing Program, regulations require subrecipients re-evaluate participant's eligibility and the types and amounts of assistance the participant needs not less than once every 12 months. Re-evaluation must establish that:

- The participant does not have an annual income that exceeds 30 percent of median family income for the area.
- The participant lacks sufficient resources and support networks necessary to retain housing.

Note: This will not affect most participants as assistance is limited to a security deposit and the first three months rent.

The subrecipient may require each rapid re-housing participant to notify the subrecipient regarding changes in their income or other circumstances that affect the need for assistance. When notified of a relevant change, the subrecipient must re-evaluate the participant's eligibility.

All recipients of rapid re-housing funding must provide a lease agreement to the rapid re-housing provider.

II. Documentation of Homelessness

Subrecipients are required to maintain documentation of the applicant's homelessness status in order to determine their eligibility. The documentation is typically obtained from a third party at the time of referral, entry, intake or orientation. The documentation should be maintained for a minimum of five (5) years after the grant period has expired.

The applicant must be homeless. A person is considered homeless only when he/she resides in one of the places described below:

- In places not meant for human habitation such as cars, parks, sidewalks, abandoned buildings, on the street;
- In transitional or supportive housing for homeless persons who *originally* came from the streets or emergency shelters;
- In any of the above places but is spending a short time (up to 30 consecutive days) in a hospital or other institution;
- Is being evicted within a week *and* the person lacks the resources to obtain housing.
- Is being discharged within a week from an institution in which the person has been a resident for more than 30 consecutive days *and* the person lacks the resources and support to obtain housing;
- Is fleeing a domestic violence housing situation *and* lacks the resources and support networks to obtain housing.

The following homeless documentation must be maintained in the client's file:

For a person living on the street or in short-term emergency shelter:

- Names of organizations or outreach workers who have assisted them in the past.
- General assistance checks and where the checks are delivered, if applicable.
- Any other information regarding the participant's activities in the recent past that might provide documentation.
- If unable to verify that the person is living on the street, the participant or staff person may prepare a short written statement about the participant's previous living place and have participant sign and date.

For a person coming from transitional housing for homeless persons:

- Written verification from the transitional housing staff signed and dated by the referring agency personnel.

For a person being evicted from a private dwelling:

- Formal eviction notice (within a week).
- Information on the participant's income and efforts made to obtain housing.
- If family evicting, a statement describing the reason for the eviction must be signed by the family member and dated. If this is not available, then subrecipient must obtain a signed and dated statement from the participant describing the situation. Subrecipients must make efforts to confirm.

For a person from a short-term stay (up to 30 consecutive days) in an institution who previously resided on the street or in an emergency shelter:

- Written verification from the institution's staff that participant has been residing in the institution for less than 31 days, and information on previous living situation.

For a person being discharged from a longer stay in an institution:

- Evidence of discharge within a week from the institution's staff.
- Income of the participant, what efforts were made to obtain housing and why, without the assistance, the participant would be living on the street or in a shelter.

For a person fleeing domestic violence:

- Written verification from the participant that he/she is fleeing a domestic violence situation, signed and dated.

III. Street Outreach

The City will not provide funding for Street Outreach Services.

IV. Referral, Length of Stay

Referrals

Subrecipients must assist each program participant, as needed, to obtain:

- Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living, and
- Other Federal, State, local and private assistance available to assist the participant in obtaining housing stability, including:
 - 1) Medicaid
 - 2) Supplemental Nutrition Assistance Program (7 CFR Parts 271-283)
 - 3) Women, Infants and Children (WIC) (7 CFR Part 246)
 - 4) Federal-State Unemployment Insurance Program (20 CFR Parts 601-603, 606, 609, 614-617, 625, 640, 650)
 - 5) Social Security Disability Insurance (SSDI) (20 CFR Part 404)
 - 6) Supplemental Security Income (SSI) (20 CFR Part 416)
 - 7) Child and Adult Care Food Program (42 U.S.C. 1766(t)(7 CFR Part 226))
 - 8) Other assistance available under the programs listed in §576.400(c)

Subrecipients must coordinate, to the maximum extent practical, with other programs targeted to homeless people to provide a strategic, community-wide system to prevent and end homelessness. These programs include:

- Shelter Care Plus
- Supportive Housing Programs
- Section 8 Moderate Rehabilitation Program for Single Room Occupancy for Homeless Individuals
- Veterans Affairs Supportive Housing
- Education for Homeless Children and Youth Grants
- Grants for the Benefit of Homeless Individuals
- Healthcare for the Homeless
- Programs for Runaway and Homeless Youth
- Projects for Assistance in Transition from Homelessness
- Services in Supportive Housing Grants
- Emergency Food and Shelter Programs
- Transitional Housing for Victims of Sexual Assault, Domestic Violence, Dating Violence and Stalking Programs
- Homeless Veterans Reintegration Program
- Domiciliary Care for Homeless Veterans Program
- VA Homeless Providers Grant and Per Diem Program
- Health Care for Homeless Veterans Program
- Homeless Veterans Dental Program
- Supportive Services for Veterans' Families Programs
- Veterans Justice Outreach Initiatives
- Public Housing
- Tenant-based or Project-based Housing Assistance Programs
- TANF
- Head Start
- Mental Health and Substance Abuse Block Grants
- Workforce Investment Act Services

Additionally, policies and procedures must be consistent with the definitions of homelessness at 24 CFR 576.2 and the recordkeeping requirements of 24 CFR 576.500 (b), (c), (d), and (e).

Length of Stay

Subrecipients must ensure program participants continually work toward securing permanent housing. Under no circumstances shall a client exceed the two-year maximum stay period. Individual subrecipients will set their own discharge policies and procedures. However, all subrecipients must have a grievance process and written procedures in place. Program participants must be informed of the grievance procedures.

V. Coordination Among Agencies

ESG recipients are required to be members in and actively participate in the CoC.

For Rapid Re-Housing, coordination among agencies will be directed by the Erie CoC. Referrals for services must come from CoC members. In order to obtain services, **clients must sign a release of information** form so the referring agency may release files to the Rapid Re-housing provider. Members that refer clients must continue providing the services they were providing at the time of the referral up until the client secures housing. CoC members will evaluate the affects of the program and report problems or concerns at the CoC general membership meeting which meets every other month.

Coordination with the CoC membership integrates the proposed program with other homeless programs and mainstream housing and service providers listed in 576.400 (b) and (c) through its diverse membership.

For discussions regarding all ESG Guideline changes, the City will consult the CoC Executive Committee or the General Membership. The City will continue to require a homeless or a formerly homeless CoC member review all updates.

Should that individual be absent from a review by any of the CoC committees, the City will seek this individual's input in addition to the CoC input.

VI. Determining Participants to Receive Homeless Prevention and Rapid Re-Housing Services

The City of Erie has elected not to provide Homeless Prevention Services at this time. Additionally, Rapid Re-Housing Services will be provided to those newly homeless participants that are referred to the Rapid Re-Housing provider by CoC members.

The Rapid R-Housing provider will make the determination as to the rapid re-housing funding to be distributed to the participant. Participants may receive a portion of the security deposit and first three months rent.

VII. Amount of Financial Assistance

The maximum amount a program participant can receive is \$2,000, however this amount should not be considered the normal amount. The Rapid Re-Housing caseworker must review the amount of the required security deposit and accompanying three months rent for cost reasonableness.

Clients must provide \$100 of the security deposit in order to receive assistance. The program will pay the balance of the security deposit and up to three month's rent for the participant. The portion of the rent to be paid will be determined by the rapid re-housing provider staff. Factors to consider in determining the amount of rent to be paid will be as follows:

- The monthly rent amount
- The client's current assets
- The client's current monthly income
- Any changes in the client's income, employment, status while receiving assistance
- The overall demand of the program
- Other assistance the participant is receiving (total monthly assistance the participant is receiving from all sources shall never exceed the total monthly rent)

Clients will be required to inform the rapid re-housing provider if their status changes, and additional evaluations may be requested. Typically, clients receive one evaluation only, as none will exceed the regulatory one-year period.

Participants may receive funding for the partial payment of a security deposit and up to three months rent one time. Once the participant receives funding for a security deposit, he/she is ineligible to receive funding for another security deposit or rent on a different unit. The participant can receive a waiver one time to this requirement if he/she did not secure or remain in housing through no fault of their own. This condition will require a waiver from three CoC executive committee members of which one member must be the Erie County representative and one member must be the City of Erie representative.

The City of Erie will use these written standards as initial guidelines for the ESG grant and will continue to refine these standards as the community, and in particular the CoC, adapts and further develops strategies and new best practices.

VIII. Reporting and Retention of Records

Subrecipients will be required to submit monthly Direct Benefit Reports by the 5th of every month and year-end final reports by July 15th of each year to the City of Erie Department of Economic and Community Development (DECD).

Client files and program records must be maintained for a minimum of five (5) years after the grant period has expired.

Subrecipients must make records available to the Grantee as requested for monitoring purposes.

IX. Performance and HMIS Standards

The City developed performance standards that everyone should have safe, decent housing and living conditions. These standards were discussed at the Executive Committee meeting on March 5, 2012, and the Home Team Meeting on March 8, 2012. These standards were approved at the March 8, 2012 meeting.

Subrecipients will track the following performance standards:

1. The number of individuals and families that secure housing through the use of the rapid re-housing partial security deposit and first three months rent.
2. The number of months that the individual/family was homeless before receiving the rapid re-housing funding.
3. The number of exceptions to the rules granted by the executive committee and the conditions/reasons for the exception.
4. The number of individuals/families that received rapid re-housing assistance because they were within 14 days of losing their primary nighttime residence versus the number of individuals/families that were already without a primary nighttime residence.

Funding for the operation and administration of HMIS will entail what is required for reporting purposes in quarterly e-snaps reports, Action Plan and CAPER. Project Hope Outreach is the designated component connected with management information for Erie County. The outreach workers maintain up-to-date information on social services available to the homeless.

Erie County's Homeless Management Information System is an electronic web-based database application. The HMIS-Erie system is administered by the Executive Director and the IT Manager of the Erie United Methodist Alliance. The system is accessible to all participating homeless service providers and other community-based programs that have been issued authorized log-ons and have participated in one-on-one user training. The system provides data collection, client tracking, bed availability, identification of gaps or duplications in services, unduplicated counts of homeless individuals and families (including the compilation of chronic individuals), and formulates reports required by funding sources and community planning.

X. Termination/Grievance

Subrecipients may terminate assistance provided by ESG-funded activities to participants who violate program requirements.

Subrecipients must have termination and grievance policies and procedures that describe the program requirements, termination process, and grievance procedure.

Subrecipients must effectively communicate the termination and grievance procedures to participants and ensure that the procedures are fully understood, either with written information or by posting the policy in a public place.

COUNCIL RESOLUTION

By: Joseph Schember

Seconded By: Jessica Horan-Kunco

COUNCIL CHAMBERS

Erie, PA May 2, 2012

Resolved, by the Council of the City of Erie,

RESOLUTION OF THE ERIE CITY COUNCIL APPROVING A SUBSTANTIAL AMENDMENT TO THE CITY'S FY2011 ANNUAL CONSOLIDATED PLAN FOR THE INCLUSION OF THE EMERGENCY SOLUTIONS GRANT (ESG)

WHEREAS, under Title IV of the McKinney-Vento Homeless Assistance Act, as amended by the Homeless Emergency and Rapid Transition Housing Act of 2009, the Secretary of the U.S. Department of Housing and Urban Development is authorized to extend financial assistance to communities under the Emergency Solutions Grant Program for households below 30% of the area median income.

WHEREAS, the U. S. Department of Housing and Urban Development has advised the City of Erie that it is eligible to receive an Emergency Solutions Grant in the amount of \$242,078; and

WHEREAS, the City of Erie, has prepared a Substantial Amendment to the City's FY 2011 Annual Consolidated Plan that describes the eligible activities under this program and how the City plans to expend these funds for households who are below 30% of median income and in need of the funds; and

WHEREAS, the Substantial Amendment to the FY 2011 Annual Consolidated Plan also identifies the activities to be undertaken to address those needs as shown in the City's Five Year Consolidated Plan and certifies the commitment of the City to comply with specific related laws and regulations under this program; and

WHEREAS, in accordance with the City's approved Citizen Participation Plan, a draft copy of the City's Substantial Amendment was on public display for the required 30 days, and the City held the required public hearing on said Substantial Amendment and all public comments were taken into consideration in the preparation of the final Substantial Amendment document.

IT IS HEREBY RESOLVED by the Erie City Council, Erie County, Pennsylvania that:

1. The Substantial Amendment to the City's Fiscal Year 2011 Action Plan for the Emergency Solutions Program Entitlement Grant is hereby in all respects approved.
2. The City Council is cognizant of the conditions that are imposed in undertaking and carrying out activities with federal financial assistance under the Emergency Solutions Program.
3. The City's Department of Economic and Community Development is hereby authorized to file the Substantial Amendment to the Fiscal Year 2011 Consolidated Annual Action Plan in the amount of \$87,148 with the U. S. Department of Housing and Urban Development on or before May 7, 2011.
4. That the Mayor, is hereby authorized to provide such assurances and/or certifications as required by the Emergency Solutions Grant Program under Title IV of the McKinney-Vento Homeless Assistance Act, and also any supplemental or revised data which HUD may request in connection with HUD's review of the City Substantial Amendment.

May 2, 2012. City Council adopt by yeas Mr. Brennan, Mrs. Horan-Kunco, & Messrs. Merski, Schember, Winarski, Witherspoon, & Jones. Yeas 7. Nays. 0.

May 2, 2012. Signed by the President. Attested by the City Clerk.

