

Consolidated Plan

2011 Addendum:
Emergency Solutions Grant

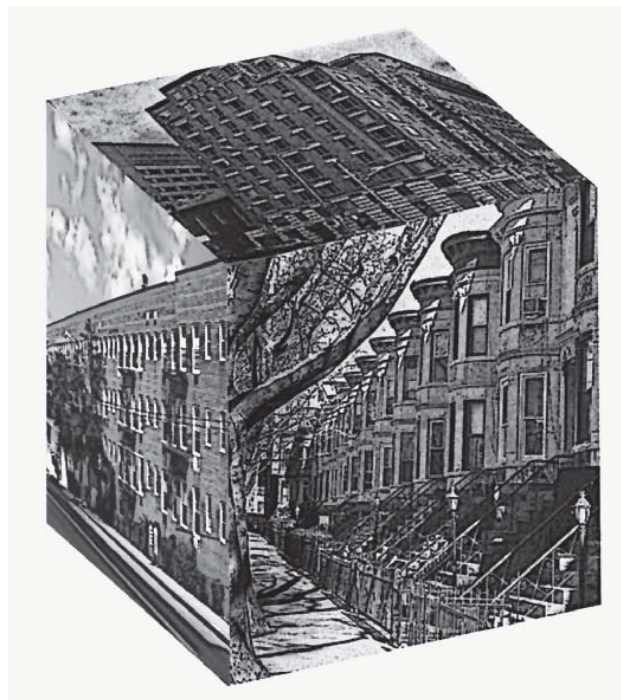


NYCTM PLANNING
DEPARTMENT OF CITY PLANNING CITY OF NEW YORK

Effective as of October 3, 2012

Consolidated Plan

2011 Addendum:
Emergency Solutions Grant



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DEPARTMENT OF CITY PLANNING CITY OF NEW YORK

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DCP # 12-04

City of New York
Substantial Amendment to the
2011 Consolidated Plan:
Addendum –
Emergency Solutions Grant (ESG)

October 3, 2012

This is the City of New York's *2011 Consolidated Plan: Addendum – Emergency Solutions Grant* which substantially amends its *2011 Consolidated Plan* and served as the City's official 2011 application to the U.S. Department of Housing and Urban Development (HUD) Office of Community Planning and Development for Emergency Solutions Grant funds.

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revises the Emergency Shelter Grants program and renames it as the Emergency Solutions Grants (ESG) program. The HEARTH Act also codifies into law the Continuum of Care planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs.

On November 15, 2011, the US Department of Housing and Urban Development released an interim rule which revises the regulations for the Emergency Shelter Grants program by establishing the regulations for the Emergency Solutions Grants program. The change in the program's name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Additional funding has been allocated in FY2011 in conjunction with the interim Emergency Solutions Grant rule. The City of New York is expected to receive \$4,448,535 in additional ESG funds.

The City of New York Department of Homeless Services is the administering agency for the ESG funds.

The Emergency Solutions Grant is a HUD formula entitlement program. It is therefore bound to HUD's Consolidated Plan regulations. Under existing Consolidated Plan citizen participation regulations, substantial amendments to an approved Plan are required to undergo a 30-day comment period prior to its submission to HUD.

The public comment period began Monday, April 9 and ended Tuesday, May 8, 2012.

All comments received at the end of the comment period (close of business) were to be summarized and the City's responses incorporated into the 2011 Consolidated Plan amendment addendum for submission to HUD. However, no public comments were received.

According to the interim rule, localities were required to submit their amendments to HUD no later than May 15, 2012 in order to be eligible to receive their respective allocation. In addition, amendments required review and approval by HUD prior to their release of the additional funds. The City of New York submitted its ESG amendment and additional federally-required materials on May 15, 2012. New York City received HUD's approval of its amendment and the second grant allocation on October, 3, 2012.

Questions regarding the amended *2011 Consolidated Plan: Addendum – Emergency Solutions Grant* may be directed to:

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This proposed amendment is provided in HUD's suggested grant submission template in a question and answer format. Answers provided by New York City are characterized as "The City of New York response" throughout this document.

In addition to the suggested template, the complete amendment contains the following additional federally-required materials: the Emergency Solutions Grant Certifications; and, Standard Form-424 (SF-424) Application for Federal Assistance; respectively. The previously mentioned materials are incorporated as appendices at the end of this template.

US-HUD Checklist of Requirements for the Substantial Amendment to the FY2011 Consolidated Plan ESG Annual Action Plan

1. Summary of Consultation Process

Describe how the recipient consulted with the Continuum(s) of Care on:

- Determining how to allocate ESG funds for eligible activities;
- Developing the performance standards for activities funded under ESG; and
- Developing funding, policies, and procedures for the operation and administration of the HMIS.

1.1 Homeless Participation Requirement

For those recipients who cannot meet the participation requirement in Sec. 576.405(a), the substantial amendment must include a plan that meets the requirements under Sec. 576.405(b).

Response:

In New York City (NYC), the CoC primary decision-making group is the NYC Coalition on the Continuum of Care (NYC CCoC) Steering Committee. The twenty-seven members of the NYC CCoC Steering Committee include 8 government representatives, 8 consumer representatives, 8 coalition representatives, and 3 at-large representatives. The Steering Committee is led by co-chairs elected annually by the Committee. The NYC Department of Homeless Services (DHS) serves as the CoC lead agency for the CCoC and as the coordinator of the annual project evaluation process. DHS also serves as the HMIS lead for the CoC and receives HUD funding for this purpose. As the lead agency of the NYC CCoC, and the grantee of this funding, DHS is primed to coordinate collaboration with the CoC on the use of the funds. The Department of Homeless Services (DHS) is invested in making sure the CCoC is consulted on the use of ESG funds and that the activities funded using this grant are in line with the CoC's strategic plan and that of the City's larger plan to overcome homelessness in New York City.

On March 16, 2012 the Deputy Commissioner for Prevention, Policy and Planning presented the framework of the plan to the Steering Committee of the NYC CCoC. The program activities, performance standards, and HMIS-related issues were all discussed. The presentation was also posted on the CCoC website for members to review and comment.

In addition, on March 14, 2012 the Data Management Committee of the NYC CCoC discussed the ESG programs and how they would be incorporated into the local HMIS.

Individuals who are homeless or who are formerly homeless sit on both the Steering Committee as well as the Data Management Committee and had input on the plan via both channels, thus satisfying Sec. 576.405(a).

2. Summary of Citizen Participation Process

- Summarize citizen participation process used;
- Summarize the public comments or views received; and
- Summarize the comments or views not accepted and include the reasons for not accepting those comments or views.

Response:

DHS strives to maintain and create collaborative relationships with our public and private partners engaged in the work of overcoming homelessness in New York City. DHS worked with the

Department of City Planning to ensure a process that encouraged citizen participation regarding this proposed substantial amendment, in accordance with federal regulations.

Notification and Outreach

In accordance with federal regulations 24 CFR 91.105(c)(2), regarding Consolidated Plan citizen participation requirements, the City of New York conducted outreach to solicit comments on the amendment. The public was notified of the comment period in several ways. A letter announcing the public comment period was sent to approximately 2,000 New York City residents, organizations and public officials. Second, the notice was posted on the Department of City Planning's Consolidated Plan-related Internet webpage (the Department of City Planning is the City of New York's lead agency for its Consolidated Plan-related submissions). Third, a notice of the public comment period was published in three newspapers with city-wide circulation, an English-language, a Spanish-language and a Chinese-language. Lastly, a brief notice regarding the comment period was posted as a public service message on the New York City-operated local cable television access channel.

Availability of the document

In accordance with federal regulations 24 CFR 91.105(g), regarding Consolidated Plan citizen participation requirements, the City of New York made copies of the amendment available to the public, free of charge, at the New York City Department of City Planning's Bookstore, 22 Reade Street, Lobby, New York, New York, 10007. In addition, an Adobe PDF version of the amendment was made available for free downloading from the Internet via both the Department of Homeless Services' and the Department of City Planning's websites at: www.nyc.gov/dhs and www.nyc.gov/planning, respectively.

Summary of Citizens Comments

The public comment period was from April 9, 2012 to May 8, 2012.

No citizens' comments were received during the public comment period.

3. Proposed Activities and Overall Budget

a. Proposed Activities

All recipients must include the following details for each proposed activity:

- (1) Corresponding priority needs from recipient's Annual Action Plan

Response:

The ESG activities will promote and enhance the goals outlined in the Consolidated Plan by supporting community-based homelessness prevention services to avert shelter entry for at-risk households and to rapidly re-house those that enter shelter. Some funds will also be used to ensure that the data system used by the ESG-funded programs is HMIS compatible and that all ESG recipients are inputting high quality data into HMIS.

- (2) Concise description of the activity, including the number and types of persons to be served

Response:

Based on the success of its HPRP programs where over 90% of individuals who exited prevention services avoided shelter entry and over 95% of individuals who received rapid re-housing services exited to permanent destinations, DHS plans to serve a wide-range of vulnerable households with targeted prevention and rapid re-housing assistance focused on housing for homeless and at-risk households. It will provide temporary financial

assistance and housing relocation and stabilization services to individuals and families who are homeless or would be homeless *but for* this assistance. The funds under this program are intended to target two populations of persons facing housing instability:

Prevention Populations eligible for homeless prevention include individuals and families who are currently in housing but are at risk of becoming homeless; they may need temporary rent or utility assistance to prevent them from becoming homeless or assistance to move to another unit.

DHS anticipates that 600 individuals will be served by community-based prevention. In addition, the Aftercare Hotline receives an average of 50 calls a day and refers individuals to appropriate services in the community.

Rapid Re-housing Populations eligible for rapid re-housing include individuals and families who are experiencing homelessness (e.g. residing in emergency or transitional shelters or on the street) and need temporary assistance in order to obtain housing and retain it. Approximately 9,000 individuals (approximately 3,000 households) will be served annually via DHS's rapid re-housing program.

HMIS DHS also plans to invest ESG funds in HMIS. All programs receiving ESG funds will be required to participate in HMIS and these funds will be used to ensure compliance with HMIS data standards, regulations, and reporting requirements; and will integrate case management into HMIS.

This will ensure that the HMIS can properly monitor grant performance of ESG projects.

(3) Corresponding standard objective and outcome categories

Response:
Please see attached table

(4) Start date and completion date

Response: DHS will begin to incur eligible expenses as soon as we are notified that this substantial amendment has been approved. We commit to expending the money within the allowable two-year period.

(5) ESG and other funding amounts

Response:
Please see attached table.

(6) One or more performance indicators

Response:

Please see attached table

(7) Projected accomplishments, in accordance with each indicator, to be made within one year

Response:

Please see attached table

(8) Projected accomplishments, in accordance with each performance indicator, to be made over the period for which the grant will be used for that activity

Response:

Please see attached table

b. Discussion of Funding Priorities

- Explain why the recipient chose to fund the proposed activities at the amounts specified (recommended: if available, use locally relevant data to support the funding priorities, and explain how the funding priorities will support the national priorities established in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*).

Response:

Between CY 2010 and CY2011, the number of families entering shelter declined by 15%. Based on the success of homelessness prevention funded by HPRP, DHS has prioritized this activity. DHS believes that successful targeting of high-risk clients for homelessness prevention, combined with effective diversion early in the shelter stay, will result in an overall reduction in the number of shelter entrants. Similarly, DHS believes effective aftercare services for clients who have exited shelter is critical for keeping clients housed. By allocating funding through our award-winning HomeBase programs, eligible participants will have access to short- and medium-term financial assistance, housing relocation and stabilization services, benefits advocacy, and case management services and will ensure more families and individuals stay stably housed in their communities and avoid the need for emergency shelter. DHS and its partners strongly believe that shelter should be used on an emergency, short-term basis. Therefore, strategies that either prevent homelessness in the first place or reduce the length of time that individuals reside in shelter are key priorities.

Using this funding toward prevention and, rapid re-housing, are in complete alignment with two of the four main goals laid out in *Opening Doors*, the Federal Strategic Plan to Prevent and End Homelessness – to prevent and end homelessness among families, youth and children; and to end all types of homelessness. Specifically, DHS’s plan for this funding meets Objective 10: *Transform homeless services to crisis response systems that prevent homelessness and rapidly return people who experience homelessness to stable housing*. DHS knows from the success of HPRP that targeted prevention works; fewer people who receive prevention services go on to become homeless and enter shelter. Targeting is critical; not all people need the same services. Some need a brief intervention with a referral to services based in the community, others need more intensive case management or financial assistance to remain housed in the community or to be rapidly re-housed if they have entered shelter.

In addition, the NYC CCoC has recently undergone a strategic planning process and has begun to implement its strategic plan. Each action step in this plan is annotated with the relevant Federal Strategic Plan objective as well as HEARTH performance measures to ensure that the CoC is working towards achieving federal goals.

- Identify any obstacles to addressing underserved needs in the community.

Response:

In New York, nearly half of all households who enter shelter come from doubled-up living arrangements, a figure not inconsistent with the rest of the country. Accordingly, HUD has identified that being doubled-up due to economic hardship is a sufficient risk factor for program eligibility. However, by requiring that a doubled-up program participant have a lease in order to receive financial assistance, HUD is hampering the ability of communities to effectively serve doubled-up families.

The experience of NYC prevention programs has shown that by the time an individual seeks to be evaluated as residing in a risky doubled-up situation, the household is already at the point of discord and the primary tenant has already attempted to have the doubled-up household leave the premises. The primary tenant in these cases is understandably not amenable to taking time off from employment to meet with prevention workers, to sharing legal documentation, and to answering highly personal questions required by HMIS. In these cases, the best practice is persuading the primary tenant to allow the double-up situation to continue while a housing plan is created and executed. The primary tenant can almost always also be classified as low-income and experiencing economic hardship, and short term financial assistance to the primary tenant's landlord, or assistance with a utility bill on behalf of the secondary tenant, can make all the difference.

Even the best housing program can take anywhere from 30 days to several months to locate an apartment. Financial assistance granted to the primary tenant's landlord on behalf of the secondary tenant (who is saving funds for future rent instead of making a rent contribution to the primary tenant—or who has no immediate funds) can give workers precious time to stabilize the living situation while a long-term housing stability plan is being coordinated.

In New York City, and in many cities throughout the country, hundreds of thousands of low-income households are able to avoid homelessness by living with family and friends. DHS does not believe that all at-risk households are best served by creating a new lease-based until the household is on firmer economic ground. Sometimes the best service option is to stabilize a double up for several months or longer until employment, benefits, educational, or other goals are met. Financial assistance on behalf of the secondary tenant, even if short term, can greatly increase the odds that service intervention will be effective in stabilizing the living arrangement and/or in successfully transitioning the secondary tenant to his or her own housing.

c. Detailed Budget

- Include detailed budget of planned activities and funding levels accounting for entire second allocation and any reprogrammed funds from the first allocation (may use Table 3 in this Notice).

-

Response: Please see attached table.

4. Match

Describe:

- Types of cash and/or non-cash resources used as match

Response: DHS will use City Tax Levy to meet the matching requirement.

- Specific amounts of resources used as match;

Response:

City Tax Levy - \$4,448,535

- Proposed uses of match resources

Response:

The matching funds will be used for ESG-eligible prevention activities. DHS has a city-wide prevention program of which ESG funds only a portion.

ACTION PLAN: Description of Program Variables

Program Information

Program Name (select):	Funding Source (select):	Funding Amount (enter):
Homelessness Prevention	Emergency Solutions Grant (ESoG)	\$2,515,298
	City Tax Levy (matching ESoG) Funds	\$4,448,535

HUD Activity/Matrix Codes (select):	Household Type(s) (select):	Income: Percent of Area Median Family Income (MFI)(Select):
Homelessness Prevention: Housing Relocation and Stabilization Services	Homeless Family with Children	Very Low (0 to 50% MFI)
Homelessness Prevention: Tenant-Based Rental Assistance	Homeless Individual	
Security Deposits (if HOME, not part of 5%)		
Homelessness Prevention		
Subsistence Payments		
General Program Administration		
Public Services (General)		
Fair Housing Activities		
Tenant/Landlord counseling		

Accomplishment (select):	Expected #:	HUD's Performance Outcome Measurement System
Total number of persons assisted with a new/improved access to a service	600	Outcome & Objective Code/Statement (select ONE):
		DH-3 Sustainability for the purpose of providing Decent Affordable Housing
		Performance Indicator (select):
		Homeless prevention

CDBG National Objectives (if applicable)

Consolidated Plan Code: [For City Planning Purposes Only]
E-DHS-0004

Consolidated Plan Strategic Objectives

Sustainability for the purpose of providing Decent Affordable Housing

Emergency Solutions Grant related Activity Codes						
Homelessness Prevention: Housing Relocation and Stabilization Services						
Homelessness Prevention: Tenant-Based Rental Assistance						
General Program Administration						

HUD Section 215 Affordable Housing Activity Goals

Beneficiary Goals (select):	Expected #:	Rental Goals (select):	Expected #:	Homeowner Goals (select):	Expected #:
Not Applicable		Not Applicable		Not Applicable	

Rationale for Funding

By allocating funding through our prevention programs, eligible participants will have access to short- and medium-term financial assistance, housing relocation and stabilization services, benefits advocacy, and case management services and will ensure more families and individuals stay stably housed in their communities and avoid the need for emergency shelter. DHS and its partners strongly believe that shelter should be used on an emergency, short-term basis. Therefore, evidenced-based, targeted strategies that prevent homelessness in the first place is a key priority. Funding will enable NYC to continue to serve populations funded by HPRP and if not for ESG funding could not be served.

ACTION PLAN: Description of Program Variables						
Program Information						
Program Name (select):			Funding Source (select):		Funding Amount (enter):	
Rapid Re-housing: Housing Relocation and Stabilization Services			Emergency Solutions Grant (ESoG)		\$1,343,237	
HUD Activity/Matrix Codes (select):		Household Type(s) (select):		Income: Percent of Area Median Family Income (MFI)(Select):		
Relocation		Homeless Family with Children		Very Low (0 to 50% MFI)		
Subsistence Payments		Homeless Family without Children				
Rapid Re-housing: Housing Relocation and Stabilization Services		Homeless Individual				
Public Services (General)						
Tenant/Landlord counseling						
Rental Housing Subsidies (if HOME, not part of 5%						
Security Deposits (if HOME, not part of 5%)						
General Program Administration						
Indirect Costs						
Accomplishment (select):		Expected #:	HUD's Performance Outcome Measurement System			
Total number of persons assisted with a new/improved access to a service		9,000	Outcome & Objective Code/Statement (select ONE):			
			DH-1 Accessibility for the purpose of providing Decent Affordable Housing			
			Performance Indicator (select):			
			Tenant-based rental assistance			
CDBG National Objectives (if applicable)			Consolidated Plan Code: [For City Planning Purposes Only]			
			E-DHS-0005			
			Consolidated Plan Strategic Objectives			
Emergency Solutions Grant related Activity Codes			Accessibility for the purpose of providing decent affordable housing.			
Rapid Re-housing: Housing Relocation and Stabilization Services						
General Program Administration						
HUD Section 215 Affordable Housing Activity Goals						
Beneficiary Goals (select):	Expected #:	Rental Goals (select):	Expected #:	Homeowner Goals (select):	Expected #:	
Not Applicable		Not Applicable		Not Applicable		
Rationale for Funding						
Building on the success of its HPRP initiatives, NYC will utilize funding to enable families to return to the community in the first ten days of their shelter stay. When a shelter stay cannot be avoided, DHS works to ensure that families can return to the community as quickly as possible. This rapid re-housing project is consistent with HUD's goals and those of the broader Federal Strategic Plan to end homelessness.						

ACTION PLAN: Description of Program Variables

Program Information				
Program Name (select):		Funding Source (select):		Funding Amount (enter):
HMIS		Emergency Solutions Grant (ESoG)		\$430,000
HUD Activity/Matrix Codes (select):		Household Type(s) (select):		Income: Percent of Area Median Family Income (MFI)(Select):
HMIS		Not Applicable		N/A Not Applicable
General Program Administration				
Accomplishment (select):		Expected #:	HUD's Performance Outcome Measurement System	
N/A Not Applicable			Outcome & Objective Code/Statement (select ONE):	
			N/A Not Applicable	
			Performance Indicator (select):	
			N/A Not Applicable	
CDBG National Objectives (if applicable)		Consolidated Plan Code: [For City Planning Purposes Only]		
		E-DHS-0006		
		Consolidated Plan Strategic Objectives		
Emergency Solutions Grant related Activity Codes		N/A		
HMIS				
Administration				
HUD Section 215 Affordable Housing Activity Goals				
Beneficiary Goals (select):		Expected #:	Rental Goals (select):	
Homeowner Goals (select):		Expected #:		
Not Applicable			Not Applicable	
			Not Applicable	
Rationale for Funding				
The Emergency Solutions Grant requires that all ESG-funded programs participate in HMIS. DHS is using a small amount of its second allocation to fund HMIS activities to ensure that the data systems used by ESG-funded programs are HMIS compatible. In addition, this funding will be used to make sure that ESG programs are compliant with the NYC CCoC HMIS Policies and Procedures and are entering high quality data into HMIS so that ESG program performance can be measured.				

FY 2011 Detailed Budget Table

First Allocation		\$7,908,520.00		FY 2011 <u>Emergency Shelter Grants/Emergency Solutions Grants</u> <u>Program Allocations</u>	
Second Allocation		\$4,448,535.00			
Grant Amount		\$12,357,055.00			
Total Administration		\$926,779.13			
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$7,110,415.00	\$0.00		\$7,110,415.00
	<i>Rehab/Conversion</i>	\$0.00	\$0.00		\$0.00
	<i>Operations</i>	\$0.00	\$0.00		\$0.00
	<i>Essential Services</i>	\$7,110,415.00	\$0.00		\$7,110,415.00
	Homelessness Prevention	\$798,105.00	\$0.00		\$798,105.00
	Administration	\$0.00	\$0.00		\$0.00
Emergency Shelter Grants Subtotal		\$7,908,520.00	\$0.00		\$7,908,520.00
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	<i>Renovation**</i>			\$0.00	\$0.00
	<i>Operation**</i>			\$0.00	\$0.00
	<i>Essential Service**</i>			\$0.00	\$0.00
	<i>URA Assistance**</i>			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS		\$0.00	\$430,000.00	\$430,000.00
	Rapid Re-housing		\$0.00	\$1,343,237.00	\$1,343,237.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$1,343,237.00	\$1,343,237.00
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Homelessness Prevention		\$0.00	\$2,515,298.00	\$2,515,298.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$1,886,473.00	\$1,886,473
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$628,825.00	\$0
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Administration			\$160,000.00	\$160,000.00
Emergency Solutions Grants Subtotal			\$0.00	\$4,448,535.00	\$4,448,535.00
		Total Grant Amount:			\$12,357,055.00

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

5. Written Standards for Provision of ESG Assistance

- a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.

Response:

In order to receive ESG-funded Prevention or Rapid Re-housing services, households must meet the following minimum criteria:

Assessment	The household must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed;
Income	Household's total income must be at or below 30% Area Media Income (AMI) and;
Housing Status	The household must be either homeless (for rapid re-housing assistance) OR at risk of losing its housing (for homelessness prevention assistance) AND meet both of the following circumstances: <ul style="list-style-type: none">▫ No appropriate subsequent housing options have been identified; and▫ The household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing.

PROPOSED ACTIVITY #1., PREVENTION - There are many people who are housed and have great need but would not become homeless if they did not receive assistance. To be eligible for ESG-funded prevention assistance, programs must assess and document that the household would become homeless ***but for*** the ESG assistance. In other words, a household would require emergency shelter or would otherwise become literally homeless in the absence of ESG assistance. A household that is at-risk of losing their present housing may be eligible if it can be documented that their loss of housing is imminent, they have no appropriate subsequent housing options, and they have no other financial resources and support networks to assist with maintaining current housing or obtaining other housing. Beyond ESG eligibility, to receive prevention services, individuals seeking prevention services will be evaluated based on a new screening tool designed following a rigorous evaluation of DHS' homeless prevention programs. Services will only be provided to those found most at risk of entering shelter.

Individual Eligibility

Households without children who have been exclusively assessed using an evidenced-based risk assessment instrument provided by DHS and who:

- a. Are at imminent risk of homelessness and
- b. currently reside or are taking up residence; or
- c. are returning to a residence after a period of less than 90 days during which they have resided in an institution (e.g., correctional, substance abuse treatment, mental health, etc.) or have been living on the street or living in shelter
- d. are experiencing a significant threat to their housing stability and is at risk of entering or re-entering shelter due to such factors as:
 - i. a shared living arrangement where there is significant overcrowding or discord; or
 - ii. the commencement of legal action that threatens to terminate the client's residency; or

- iii. a need to stabilize housing where the client has reintegrated into the community after moving out of a shelter or other institution;
- iv. or the end of an existing housing subsidy or is at risk of losing the subsidy.
- e. Household income must not exceed 30% of Area Median Income.

Family Eligibility

Families who have been exclusively assessed using DHS's risk assessment and who:

- a. Are at imminent risk of homelessness and
- b. currently reside or are taking up residence; or
- c. are returning to a residence after a period of less than 90 days during which they have resided in an institution (e.g., correctional, substance abuse treatment, mental health, etc.) or have been living on the street or living in shelter
- d. are experiencing a significant threat to their housing stability and is at risk of entering or re-entering shelter due to such factors as:
 - i. a shared living arrangement where there is significant overcrowding or discord; or
 - ii. the commencement of legal action that threatens to terminate the client's residency; or
 - iii. a need to stabilize housing where the client has reintegrated into the community after moving out of a shelter or other institution;
 - iv. or the end of an existing housing subsidy or is at risk of losing the subsidy.

PROPOSED ACTIVITY #2., RAPID RE-HOUSING: Rapid re-housing assistance is available for persons who are homeless according to HUD's definition and *for whom* the ESG assistance can be used within the first 10 days of a shelter stay to re-house the family. Households that meet one of the following criteria in addition to the minimum requirements specified in the following section (Eligibility Determination) are eligible for ESG rapid re-housing assistance:

- Sleeping in an emergency shelter;
 - Sleeping in a place not meant for human habitation, such as cars, parks, abandoned buildings, streets/sidewalks;
 - Staying in a hospital or other institution for up to 90 days but was sleeping in an emergency shelter or other place not meant for human habitation (cars, parks, streets, etc.) immediately prior to entry into the hospital or institution;
 - Graduating from, or timing out of a transitional housing program; and
 - Victims of domestic violence.
- b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

Response:

All Prevention and Rapid Re-housing programs will coordinate efforts with other service providers to provide cohesive services to better meet a client's need(s). The programs will maximize the services funded by ESG by avoiding duplication of services with other programs that are serving the same household.

All prevention and rapid re-housing programs will use the current social service, legal and employment network in New York City, as well as applicable State and Federal resources to maximize available assistance for recipients. When appropriate, the programs will assist clients at risk of homelessness to secure available public or private subsidies and assistance, including Public Assistance and Special Grants from the TANF agency to remain housed in the community. The programs will have formal relationships with appropriately qualified organizations that provide homelessness prevention services, including, but not limited to, the following:

- 1). Anti-Eviction Legal Services: the programs will create and/or maintain formal relationships with an anti-eviction legal services contractor(s) that will offer legal assistance to community residents who are facing an eviction proceeding.
 - 2). Financial Assistance/Financial Counseling: the programs will utilize assistance available from New York City agencies and other contractors to assist residents at risk of homelessness with obtaining financial assistance and counseling.
 - 3). Employment Services: the programs will establish linkages with City agencies and other employment placement and training programs, to assist clients to gain employment, which would lead to self sufficiency.
 - 4). Property Owners, Property Owner Associations, and Real Estate Brokers: the programs will create and maintain relationships with property owners, property owner associations, and/or brokers with access to suitable stable housing in order to relocate clients when necessary to avoid shelter entry or re-entry.
 - 5). Veteran's Affairs: the programs will create and maintain formal relationships with public and non-profit programs that serve homeless and at-risk veteran families for the purpose of service referrals and ensuring that veterans have access to the full array of benefits available to them.
 - 6). Other Support Services: the programs will create and maintain relationships with appropriately qualified organizations that provide services that assist community residents at-risk of homelessness to remain permanently housed. Such services shall include, but are not limited to, mental health services, domestic violence services, substance abuse counseling, prison re-entry services, and child welfare.
- c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

Response:

Prevention: Prevention programs will be using a highly developed, evidence-based risk assessment instrument provided by DHS to determine which level of service eligible clients will receive. Clients are highest risk will receive the most service, including service planning, home visits, and potentially financial assistance. Financial assistance would be sought first from available and public and private subsidies, including Public Assistance and Special Grants from New York City's Human Resource Administration (HRA). If no other assistance is available, the program can provide assistance to help clients remain stably housed in the community, while those with fewer risk factors will receive a lighter intervention. Individuals who are not at risk, according to the tool, will be referred to universal services available in the community.

The purpose of ESG rapid re-housing funds is to assist eligible program participants to quickly obtain and sustain stable housing. Therefore, providers will assess all potential program participants for their level of service need, other resources available to them,

and the appropriateness of their participation in the rapid re-housing assistance portion of ESG. Program participants who require longer-term housing assistance and services should be directed to programs that can provide the requisite services and financial assistance.

- d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.

Response:

DHS's prevention and rapid re-housing programs already have a requirement that generally does require program participants to share in the costs of rent, utilities, security and utility deposits, as a condition of receiving ESG financial assistance. However, because the services are driven by the specific circumstances of the case, DHS allows the service providers the flexibility to determine whether a client must contribute and how much. As a guide, however, clients who can pay generally are required to contribute 30% of their income toward the rent. A client's inability to contribute does not necessarily preclude him/her from receiving financial assistance.

- e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

Response:

The ESG-funded program may determine the amount rental assistance provided, such as "shallow subsidies" (payment of a portion of the rent), payment of 100 percent of the rent charged, or graduated/declining subsidies. DHS programs may also set a maximum amount of assistance that a single individual or family may receive from ESG funds, as long as the total amount of assistance that any individual or family receives does not exceed an amount equal to 24 months of rental assistance during any three year period. Again, because the services are customized to the client, clients with higher risk receiving more intensive services, the program has the flexibility to determine the length and graduation of rental assistance.

- f. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

Response:

Services for eligible individuals or families will be limited to 24 months during any three year period. Clients will be assessed for eligibility every three months if they are receiving prevention services and every year if they are receiving rapid re-housing services. As described above, DHS allows its service providers flexibility in determining type, amount, duration of assistance, provided it remains within what is allowable under the ESG regulations, and it is driven by the client's need as determined by the evidence-based risk assessment.

6. Describe Process for Making Sub-Awards

Response:

ESG funds will be used in DHS's existing homelessness prevention and rapid re-housing contracts that are currently funded by HPRP. This requires some internal processing with our Budget department but does not affect the contracts or contracting process. Some of the funds will be used directly by DHS for its staff who perform prevention and rapid re-housing activities.

7. Performance Standards

The recipient must describe the performance standards for evaluating ESG activities, which must be developed in consultation with the Continuum(s) of Care.

Response:

DHS will utilize its experience from its successful implementation of HPRP to evaluate ESG activities. DHS shared this framework with the Continuum of Care Steering Committee and will review periodically with the CoC Data Management Committee. DHS will utilize its HMIS to monitor performance through the following indicators:

- Number of individuals/households served by prevention and rapid re-housing activities
- Exit destinations (temporary and permanent) of individuals/households served
- % of clients served who avoid shelter entry
- Length of time served by ESG program

8. Certifications

Note: The Emergency Solution Grant-specific Certifications are located in Appendix2: *Certifications*.

Requirements for Recipients Who Plan To Use the Risk Factor Under Paragraph (1)(iii)(G) of the "at Risk of Homelessness" Definition

- If recipient plans to serve persons "at risk of homelessness," based on the risk factor "otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness:" describe specific characteristics associated with instability and increased risk of homelessness.

Response:

In 2009, New York City commissioned the first rigorous evaluation of homelessness prevention in the country that includes a random control trial, a quasi-experimental design study, hazard modeling and ecological regression analyses. The research team from Columbia University, Abt Associates, Vanderbilt University, University of Pennsylvania and the City University of New York found:

- There are five critical characteristics of families who enter shelter and by screening people for these characteristics; NYC can improve its ability to predict who will enter shelter by 30 percent.
- Researchers have confirmed that there are no barriers too high to serve with prevention services. HomeBase is at its most effective serving the most at-risk families.

DHS has used these findings to develop a screening tool in order to assess an individual's risk of entering shelter. Prevention services will only be provided to those found to be most at risk of entering shelter.

Prevention Risk Factors While HUD's definition of homelessness is well-understood, it can be more challenging to identify persons who are housed but who have a very high risk of becoming homeless. Through the research described above, DHS's risk assessment tool screens clients for the following human capital, demographic, and housing variables. These risk factors are grouped by how they are weighted on the screening tool:

Low-weight risk factors: Pregnancy, having a child under age 2, no high school diploma/GED, no current employment, not a lease holder, reintegrating into the community, aged 23-28, 1-3 moves in the last year, 1-2 disruptive childhood experiences, moderate discord with landlord/leaseholder/household.

Medium-weight risk factors: Receiving PA, involved with protective services, evicted/asked to leave, applied to shelter in the last 3 months, 22 years old or younger, 4 or more moves within the last year, moderate to severe discord with landlord/leaseholder/ household.

Highest-weight risk factor: Previous shelter history as an adult.

Using the tool to assess risk and then future shelter entry, the study did show that "even at the highest level of measured risk, a majority of families managed to avoid shelter." (Shinn, M. & Greer, A.L, 2011) Thus, those determined to be at the highest risk of entering shelter are provided with the most services.

Requirements for *Optional Changes* to the FY 2011 Annual Action Plan

1. Centralized or Coordinated Assessment System

- If the recipient's jurisdiction, or a portion of the recipient's jurisdiction, currently has a centralized or coordinated assessment system and the recipient or subrecipients utilize the centralized or coordinated assessment system, the recipient should describe the assessment system in the substantial amendment.

Response:

DHS has central points of intake into emergency shelter for families for single adults, and for adult families. Each point of intake conducts an assessment of the individual and/or family to determine the specific strengths and needs of the case.

In addition, through 311, individuals can access information about non-emergency services, including DHS' community-based prevention and aftercare services, as well as food pantries and tenant and landlord dispute information.

2. Monitoring

- If existing monitoring procedures are not sufficient to allow recipients to monitor compliance with the new requirements, HUD encourages recipients to update their monitoring standards and procedures in the process of submitting this substantial amendment. This should address appropriate levels of staffing.

Response: The existing monitoring procedures are sufficient and DHS will ensure that there are adequate staff to carry out monitoring activities for programs funded through ESG.

Appendices

**A1., Standard Form 424 (SF-424), Application for Emergency Solutions Grant funds;
A2., Emergency Solutions Grant Certifications.**

Appendix 1: Standard Form-424, Application for Federal Assistance

Standard Form 424 (as known as “SF-424”) is the form used by the states, counties, localities, and not-for-profit organizations to apply for federal funds. The SF-424 is the actual application for the ESG funds.

Application for Federal Assistance SF-424	Version 02
*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. DEPT OF HOUSING AND URBAN DEVELOPMENT	
11. Catalog of Federal Domestic Assistance Number: 14-231 _____ CFDA Title: EMERGENCY SOLUTIONS GRANT PROGRAM _____	
*12 Funding Opportunity Number: _____ *Title: _____	
13. Competition Identification Number: _____ Title: _____	
14. Areas Affected by Project (Cities, Counties, States, etc.): CITY OF NEW YORK	
*15. Descriptive Title of Applicant's Project: EMERGENCY SHELTER GRANT 26	

Application for Federal Assistance SF-424 Version 02

16. Congressional Districts Of:
*a. Applicant: NY 006 THROUGH 019 *b. Program/Project: NY 006 THROUGH 019

17. Proposed Project:
*a. Start Date: 03/15/11 *b. End Date: 06/30/2014

18. Estimated Funding (\$):

*a. Federal	12,357,055
*b. Applicant	_____
*c. State	_____
*d. Local	_____
*e. Other	4,448,535
*f. Program Income	_____
*g. TOTAL	16,805,590

***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: ROBERT
Middle Name: K.
*Last Name: STEEL
Suffix: _____

*Title: DEPUTY MAYOR, CITY OF NEW YORK

*Telephone Number: (212) 788-3098 Fax Number: _____

* Email: rgoldrich@cityhall.nyc.gov

*Signature of Authorized Representative:  *Date Signed: 4-20-12

Application for Federal Assistance SF-424

Version 02

***Applicant Federal Debt Delinquency Explanation**

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

N/A

Appendix 2: Certifications

The following Emergency Solutions Grant (ESG) Program Certifications are New York City's written pledge to uphold and comply with specific governmental regulations, requirements and statues concerning the use and disbursement of federal ESG funds. The new Certifications supersede the regulations specific the Emergency Shelter Grant program that were in effect when the City's 2011 Consolidated Plan was approved by the U.S. Department of Housing and Urban Development in order to conform with the enabling legislation as described in the HEARTH Act.

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.

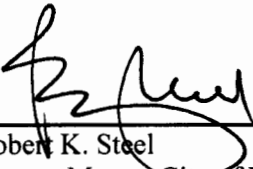
Matching Funds – The jurisdiction will obtain matching amounts required under 24 CFR 576.201.

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.



Robert K. Steel
Deputy Mayor, City of New York

4-20-12
Date

PARTICIPATING AGENCIES

The City of New York

Michael R. Bloomberg, Mayor

Robert K. Steel, Deputy Mayor for Economic Development

Linda I. Gibbs, Deputy Mayor for Health and Human Services

Emergency Solutions Grant (ESG) Program Administering Agency

DEPARTMENT OF HOMELESS SERVICES

Seth Diamond, Commissioner

Ellen Howard-Cooper, Deputy Commissioner, Division of Prevention, Policy & Planning

Eileen Lynch Johns, Assistant Commissioner, Division of Prevention, Policy & Planning

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