



City of Lowell
Massachusetts



Annual Action Plan
Fiscal Year 2011-2012

SUBSTANTIAL AMENDMENT

For
**The Second Allocation of Emergency Solutions
Grant (ESG) Program Funding**

FINAL REPORT

Office of the City Manager
Department of Planning and Development
JFK Civic Center, 50 Arcand Drive
Lowell, MA 01852
978-674-4252

May 2012

Substantial Amendment to the Consolidated Plan 2011-2012 Action Plan

Emergency Solutions Grant Program (ESG)

CONTENTS:

HUD Form SF 424

Summary of Consultation Process

Summary of Citizen Participation (including Public Comments and Public Hearing Sign-in sheet- to be included with Final Plan)

Match Requirements

Proposed Activities, Discussion of Funding Priorities & Detailed Budget

Written Standards for the Provision of ESG Assistance

Making Sub-awards

Homeless Participation Requirement

Performance Standards

Certifications

ATTACHMENTS:

Table 1: Declaration of FY 2010 Grant Fund Commitments

CPMP Project Worksheets

APPLICATION FOR FEDERAL ASSISTANCE

OMB Approval No. 0348-0043

1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction Preapplication <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		2. DATE SUBMITTED	Applicant Identifier
		3. DATE RECEIVED BY STATE	State Application Identifier
		4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier
5. APPLICANT INFORMATION			
Legal Name:		Organizational Unit:	
Address (give city, county, State, and zip code):		Name and telephone number of person to be contacted on matters involving this application (give area code)	
6. EMPLOYER IDENTIFICATION NUMBER (EIN): <input type="text"/> <input type="text"/> - <input type="text"/>		7. TYPE OF APPLICANT: (enter appropriate letter in box) <input type="checkbox"/>	
8. TYPE OF APPLICATION: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) <input type="checkbox"/> <input type="checkbox"/> A. Increase Award B. Decrease Award C. Increase Duration D. Decrease Duration Other(specify): _____		A. State B. County C. Municipal D. Township E. Interstate F. Intermunicipal G. Special District H. Independent School Dist. I. State Controlled Institution of Higher Learning J. Private University K. Indian Tribe L. Individual M. Profit Organization N. Other (Specify) _____	
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: <input type="text"/> <input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/>		9. NAME OF FEDERAL AGENCY:	
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): TITLE: _____		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:	
13. PROPOSED PROJECT		14. CONGRESSIONAL DISTRICTS OF:	
Start Date	Ending Date	a. Applicant	b. Project
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?	
a. Federal	\$.00	a. YES. THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON:	
b. Applicant	\$.00	DATE _____	
c. State	\$.00	b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372	
d. Local	\$.00	<input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW	
e. Other	\$.00	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?	
f. Program Income	\$.00	<input type="checkbox"/> Yes If "Yes," attach an explanation. <input type="checkbox"/> No	
g. TOTAL	\$.00		
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT, THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.			
a. Type Name of Authorized Representative		b. Title	c. Telephone Number
d. Signature of Authorized Representative		e. Date Signed	

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

Summary of Consultation Process

In the development of this Substantial Amendment and the allocation of the second round of FY11-12 ESG funds, Department of Planning and Development staff coordinated with the Lowell Continuum of Care in the following ways:

Lowell Continuum of Care Lead: Department of Planning and Development Community Development Specialist

The City's Department of Planning and Development (DPD) is the Lead Entity for the Lowell Continuum of Care (CoC). With oversight from a Community Development Specialist from DPD, nonprofit organizations in Lowell that are members of the CoC are working to provide services to help increase the self-sufficiency of homeless persons and those with issues of mental illness, substance abuse, domestic violence and disabilities that are at-risk of homelessness. The CoC operates a Homeless Management Information System (HMIS), which has been installed at five homeless provider locations. Data is collected annually to create a Housing Gaps Analysis Chart that is used by the community to determine the unmet need for emergency shelters, transitional housing programs and permanent housing sites for homeless persons. Current Lowell CoC Member Organizations are:

- Alternative House
- Bridgewell, Inc./ Pathfinder
- Community Teamwork, Inc.- Housing Consumer Education Center
- Community Teamwork, Inc.- Shelter Programs
- Crescent House
- House of Hope
- Lowell Housing Authority
- Lowell Transitional Living Center
- The Princeton House
- United Teen Equality Center
- Vinfen

In addition to her role as lead coordinator for the CoC, the Community Development Specialist also participated on the internal Department of Planning and Development committee tasked with evaluating proposals for the additional allocation of FY11-12 funds.

Additional Coordination between ESG Administrators and the CoC:

To increase the level of coordination between the CoC and the local homeless programs, staff responsible for the administration of the ESG program attend CoC meetings on a regular basis. Input and data from CoC members has been integrated throughout the Written Standards and was used as a main point of reference in the prioritization of this additional allocation of FY11-12 ESG funding. Direct interactions with CoC service providers has allowed DPD staff to prioritize funding in support of the needs that are not currently being addressed by other federal, state and local funding sources.

Specifically, data from the Lowell CoC's Point in Time Count was used to identify the most pressing needs amongst the homeless community in Lowell. Additionally, narrative accounts from individual CoC members was used to better understand the emerging needs of Lowell's

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

most vulnerable populations. These narrative accounts included insightful summaries of individual CoC member's findings from the annual Point in Time Count. During these discussions, emphasis was placed on noticeable changes that have taken place with the city's homeless population over the past year. The CoC was also instrumental in informing Department of Planning and Development staff on the current need areas that are not being addressed by other federal, state and private homeless programs.

Consultation with Homeless and At-Risk Homeless Service Providers Outside of the CoC:

Department of Planning and Development staff also consulted with several homeless and at-risk homeless service providers outside of the CoC in prioritizing this funding. In future fiscal years, these outreach activities will continue and be further developed. Additional outreach efforts include:

- The distribution of a survey to solicit feedback from organizations or programs that may not be a part of the CoC. The purpose of this survey was to identify and better understand the most pressing needs of the homeless population in Lowell at present. Particular emphasis was placed on identifying sub-populations of homeless or at-risk homeless individuals that are growing or have disproportionate needs at present. Additionally, service providers were asked to identify areas of need that are not currently being addressed by other federal, state or local funding sources.
- In coordination with the conclusion of the City of Lowell's Homelessness Prevention and Rapid Re-Housing Program (HPRP) Recovery Act Program, Department of Planning and Development staff hosted a conference for all HPRP subrecipients entitled "Wrapping Up HPRP." The main purpose of this meeting was to cover grant close-out requirements and highlight successes/ identify challenges that were encountered in rolling out and administering the HPRP Program. Many of the topics covered at this event were incorporated as Best Practices in the new ESG program.

Summary of Citizen Participation

As required by the Department of Housing and Urban Development Rules and Regulations, the City complies with regulation 24 CFR 91.105, Citizen Participation Plan for local governments as outlined. The components of Lowell's citizen participation plan have been designed with the explicit intention of accommodating and encouraging participation by low- and moderate-income residents, residents of low- and moderate-income neighborhoods, members of minority groups, persons with limited English proficiency, and persons with disabilities.

Programs supported with the Second Allocation of FY 11-12 ESG funds are included as a Substantial Amendment to the 2011-12 Annual Action Plan. A complete draft of the Substantial Amendment was available for a 30-day public comment period beginning March 19, 2012. An announcement on the availability of the Draft was made in the *Lowell Sun*, on the City's website, and in posted notices in English, Spanish, Portuguese, and Khmer (Cambodian). The Draft Substantial Amendment was emailed to current and former ESG subrecipients and HPRP subrecipients for formal comment. A short presentation was given on the document at a CoC meeting to solicit feedback and suggestions. Copies were also available at a public hearing on March 29, 2012. The hearing was held at the Lowell Senior Center, to solicit comments on the draft. This location is in the heart of one of Lowell's lowest-income neighborhoods, is a fully accessible facility and offers ample free parking. Comments received

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

at this Public Hearing have been included in this document along with the City’s responses. See the table below for the citizen participation schedule:

Substantial Amendment Citizen Participation Schedule

DATE	ACTION
February 17, 2012	Release of RFP for the Second Allocation of FY11-12 ESG funds. The availability of this RFP was advertised in the <i>Lowell Sun</i> , on the City’s website and with posted notices in several languages at the public library, city hall, and Department of Planning and Development offices. A notice of the release of this RFP was also emailed to the City’s Consolidated Plan partners, including current ESG, CDBG and HPRP subrecipients.
March 6, 2012	"Wrapping Up HPRP" Seminar: Successes and Lessons Learned from the implementation of the City of Lowell’s Homelessness Prevention and Rapid Re-housing Program (HPRP) were discussed at this event. A total of 22 individuals representing each of the City’s HPRP subrecipient organizations attended this event. With the results from this meeting, a list of "Best Practices" was assembled and used to outline priorities for ESG funding in the <i>Written Standards for the Provision of ESG Assistance</i>
March 9, 2012	Due date for applications requesting ESG funds under this Substantial Amendment. 6 proposals were received for ESG funds.
March 13, 2012	ESG RFP Selection Process: An internal committee of Department of Planning and Development Staff—including the CoC Lead—convened to review, evaluate and make funding recommendations for the proposals received for ESG funds.
March 19, 2012	Draft of Substantial Amendment available for citizen review. Beginning of 30-day Citizen Comment Period.
March 29, 2012	Public Hearing: A public hearing was offered to present the Draft 2012-2013 Annual Action Plan and this Substantial Amendment to the 2011-2012 Annual Action Plan. Copies of both draft documents were made available.
April 20, 2012	End of Citizen Comment Period: Comments received during this 30-day comment period have been reviewed and have been included in this report along with the City's responses.
May 2, 2012	Final Substantial Amendment presented to the Lowell City Council for review and approval.
May 15, 2012	Final Substantial Amendment made available to the public.
May 15, 2012	Final Plan submitted to HUD- Boston for review and approval.

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

Public Comments

The following public comments were received as part of the public consultation process for this Substantial Amendment. Also included are the City's responses to each of these comments.

From: [Larry Gottlieb](#)
To: [Currier, Emily](#)
Subject: RE: SEEKING COMMENTS: Changes to the Emergency Solutions Grant (ESG) Program
Date: Monday, March 19, 2012 3:43:26 PM

Emily,

I looked over the Substantial Amendment Document and I have the following comments:

1. Homeless Participation Requirements: Several grants that we receive require us to organize ongoing "consumer groups" and get feedback about service needs and other barriers to ending homelessness in the unaccompanied single-adult population. In fact, one of our grants (PATH) expects that we will engage consumers in a range of activities (even employing them when possible) whereby they can assist other consumers and share successes at ending their homelessness. We have a few groups running in several parts of the state (Western MA, Worcester) where clients at various levels of homelessness come together for mutual support and advice. I know you are probably not looking for anything too long in duration as far as meetings, to get some good feedback from consumers. Homeless consumers (on the adult side) are often tough to organize for a variety of reasons...they are often in survival mode and they are required to return to the shelters in the late afternoon to secure a bed...We have introduced some "incentives" to keep our groups going...We provide food and often transportation to the meetings, we mix formerly homeless and presently homeless in order to get a diverse perspective on homelessness, and sometimes we even give things like gift cards to CVS, Walmart, or Dunkin Donuts to get folks to participate. It works in many places that we serve.

2. Performance Measures-Of course the biggest barrier to getting folks housed are the financial requirements. Most of our adult clients CANNOT get housing without a subsidy...Client incomes are usually so low from SSI, EAEDC or if even if they are fortunate enough to work, cannot sustain any long-term market rate housing...So the likelihood of losing their housing is high if they do not have a sustainable income to afford a market rate unit. That's why the subsidy issue is so critical...Clients who have to pay in excess of 30% of their income towards their housing are doomed to fail w/o some additional help. Of course as we continue to practice "low threshold, Housing First Models" most clients will not be able to maintain stability in their housing w/o active case management as a minimum requirement. So measuring sustainability by some type of "metric" based on length of time is a false hope if we do not have a client with a sustainable way of paying for the housing and the services in place to help ensure their success.

I am sure if this is what you were seeking in your email...but I hope it's helpful...

Larry Gottlieb
Eliot CHS

The City's Response: The City thanks Eliot Community Human Services for submitting comments to this Substantial Amendment. Regarding the first point, The City appreciates Eliot Community Human Services' input on their own methods for including homeless and at-risk homeless in their own planning processes. The challenges faced in organizing these groups is also a helpful point. Although the City is not currently in a position to offer incentives as part of the participation process, it is something that will be kept in mind for the future. Additionally,

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

opportunities may exist for the City to work with its non-profit partners to offer incentives as part of the participation process. Regarding Mr. Gottlieb's second point, The City recognizes ECHS's concerns and has worked to both make subsidies an eligible cost type under the new ESG as well as provide flexibility in the length and types of case management that can be covered under this grant. If at some point in the future ECHS (or any other interested applicant) identifies an activity-type not outlined in the Written Standards, the City encourages these sub-recipients to reach out to us so as to work collaboratively to address underserved needs with ESG funds.

From: [David Robinson](#)
To: [Currier, Emily](#)
Subject: RE: SEEKING COMMENTS: Changes to the Emergency Solutions Grant (ESG) Program
Date: Thursday, April 19, 2012 2:16:01 PM

Emily,

I have re-reviewed the "Substantial Amendment to the 2011-2012 Annual Action Plan." I think that the idea of bringing on "stake-holder"s as participants in a panel is an appropriate idea. Bridgewell, my agency uses this method for everything from quality control, quality assurance, feed back, human rights committees, and strategic planning. I think that users of these resources should have a say, as well as a stake in the overall planning and development. I think that there is an air of unpredictability at times when consumers are asked to join in for planning sessions, but just about every consumer group has input when it comes to service delivery. To seek input from consumers at the development phase, makes sense. Ownership is very important and this sounds like ownership and engagement at a whole new level. I think HUD and the CoC are right on track.

Thanks for letting me share my thoughts,

Dave

David S. Robinson
Director
Pathfinder PSH, Drop-In Center & Apts.
94 Rock St. Lowell, MA 01854
Phone: (978) 459-3387
Fax: (978) 970-1096
E-mail: drobenson@bridgewell.org

The City's Response: The City appreciates Pathfinder's comments on the Substantial Amendment and agrees that efforts to include homeless and at-risk homeless in the planning processes for use of ESG funds will be both useful and productive.

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

From: [David McCloskey](#)
To: [Currier, Emily](#)
Subject: RE: SEEKING COMMENTS: Changes to the Emergency Solutions Grant (ESG) Program
Date: Friday, April 20, 2012 2:48:28 PM
Attachments: [ESG SubAmendment12.doc](#)

I am sorry for the lateness.

I am aware this is a view by the LTLC Staff, primarily Case Managers and Outreach Staff, that meets directly with the clients in the streets, in the shelter (candidates for housing) and the housed. The source of their concern is the fragile nature of homeless clients and the lack of linearity with regard to treatment and permanent solutions to being stably housed.

We hope this is helpful.

If you have questions please email or call.

Dave

The City's Response: The City would like to thank David McCloskey, Interim Director of the Lowell Transitional Living Center for submitting comments on this Substantial Amendment. Ensuring the stability of newly housed homeless individuals is a difficult but critical role in helping to address homelessness in Lowell. The City of Lowell, members of the Continuum of Care, and participants in the 10 Year Plan to End Homeless Action Committee are committed to finding solutions to this challenge. Under the HEARTH Act coordination among these groups and other social service agencies in Lowell will be enhanced. This improved coordination should help identify gaps in available services and find solutions to support households moving out of shelters into permanent housing.

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

Match Requirements

In accordance with 24 CFR 576.201, an equal match has been raised by each of the City of Lowell’s ESG subrecipients for this allocation of funding. Match by subrecipient, type, amount and proposed use has been outlined in the table below in accordance with 24 CFR 91.320(c).

Matching Funds: Second Allocation of FY2011-2012 ESG Funds							
Organization/Project	ESG Award	Federal	State	Local	Private	TOTAL MATCH	Proposed Use for Matching Funds
Community Teamwork, Inc- SHIFT Coalition	\$20,000.00	\$11,142.00	\$65,858.00		\$105,000.00	\$182,000.00	Rental & Utility Arrears, Housing Counselor Salary, SHIFT Project Coordinator Salary
Eliot Community Human Services- Aggressive Street Outreach (ASO)	\$5,000.00	\$8,500.00	\$5,500.00			\$14,000.00	Clinician Salary, Furniture and Household Items
Eliot Community Human Services- Tenancy Preservation Program	\$5,000.00		\$6,500.00			\$6,500.00	Court Clinician Salary
House of Hope- Housing Resource Center	\$25,000.00		\$46,000.00		\$8,002.00	\$54,002.00	Case Manager Salaries
Lowell Transitional Living Center- Rapid Re-Housing Stabilization	\$6,226.63		\$36,000.00	\$4,500.00		\$40,500.00	Shelter Case Manager, Housing Search Specialist and Outreach Case Manger Salaries

Proposed Activities, Discussion of Funding Priorities & Detailed Budget

a.) Proposed Activities: Below is a list of proposed activities for this second allocation of FY11-12 ESG funding. Worksheets from the Consolidated Plan Management Process (CPMP) tool have been included as attachments to this Substantial Amendment. Please refer to these project worksheets for details on individual proposed activities.

Proposed Activities: Second Allocation of ESG Funds				
ORGANIZATION	PROJECT NAME	ESG Award	Assistance Type	Service Type
Community Teamwork, Inc.	SHIFT Coalition	\$20,000.00	Homelessness Prevention	Direct Financial Assistance/ Housing Relocation and Stabilization Services
Eliot Community Human Services	Tenancy Preservation Program	\$5,000.00	Homelessness Prevention	Direct Financial Assistance
Eliot Community Human Services	Aggressive Street Outreach (ASO)	\$5,000.00	Rapid Re-Housing	Direct Financial Assistance
House of Hope	Housing Resource Center	\$25,000.00	Rapid Re-Housing	Housing Relocation and Stabilization Services
Lowell Transitional Living Center	Rapid Re-Housing Stabilization	\$6,226.63	Rapid Re-Housing	Direct Financial Assistance

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

b.) Discussion of Funding Priorities

In conjunction with the development of the *Written Standards for the Provision of Emergency Solutions Grant Assistance*, priority areas were identified and used as guiding principles in allocating this funding. An internal committee of Department of Planning and Development staff reviewed the proposals and made decisions based on the following competitive criteria:

- Community Need: Does the proposed project address a pressing or significant need pertaining to the homeless or at-risk homeless population in the City of Lowell?
- Resources and Capacity: Does the organization have the appropriate level of experienced staff and resources to execute the proposed project?
- Encouraging Partnerships: Does the proposed project involve new or existing partnerships with other service providers in the community?
- Leveraged Funding: Has the organization secured additional funding sources or in-kind support to cover the proposed project?

In addition to the comparative criteria listed above, particular emphasis was placed on each organization's past performance with both ESG and HPRP grant funding. DPD staff gave careful consideration to each organization's prior experience in the following areas:

- Prior success in assisting clients to obtain or maintain permanent, stable housing while connecting them to the proper services to meet individualized needs.
- Demonstrated ability to accomplish goals as spelled out in contractual performance-based reporting formulas.
- Timely and accurate submittal of required forms and paperwork.
- Compliance with reporting requirements.
- Access to and experience working with an HMIS system.

The City of Lowell will continue to support non-profit agencies, the local housing authority, homeless providers and special needs groups in their goal to meet the underserved persons of the community. The City will continue to communicate with these groups as their needs change or as the demand for services dramatically increases over the next year. The City will also provide technical assistance to providers in the pursuit of Federal, State and other funding sources.

The primary obstacle to meeting underserved needs of low-income and moderate-income populations in the community continues to be the limited availability of funds. Organizations serving these populations continue to experience significant reductions in funding from both governmental and private funding sources. These funding challenges are beyond the capacity of the local jurisdiction to satisfactorily address.

c.) Detailed Budget

(please proceed to next page)

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

FY 2011 Detailed Budget Table					
First Allocation	\$105,442.00	FY 2011			
Second Allocation	\$59,311.00	Emergency Shelter Grants/Emergency Solutions Grant			
Grant Amount	\$164,753.00	Program Allocations			
Total Administration	\$12,356.48				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$71,000.00	\$9,000.00		\$62,000.00
	<i>Rehab/Conversion</i>				\$0.00
	<i>Operations</i>	\$53,000.00	\$9,000.00		\$44,000.00
	<i>Essential Services</i>	\$18,000.00			\$18,000.00
	Homelessness Prevention	\$29,170.00			\$29,170.00
	Administration	\$5,272.00			\$5,272.00
	Emergency Shelter Grants Subtotal	\$105,442.00	\$9,000.00		\$96,442.00
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	<i>Renovation**</i>			\$0.00	\$0.00
	<i>Operation**</i>			\$0.00	\$0.00
	<i>Essential Service**</i>			\$0.00	\$0.00
	<i>URA Assistance**</i>			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS				\$0.00
	Rapid Re-housing		\$0.00	\$36,226.63	\$36,226.63
	<i>Housing Relocation and Stabilization Services</i>			\$25,000.00	\$25,000.00
	<i>Tenant-Based Rental Assistance</i>			\$11,226.63	\$11,226.63
	<i>Project-Based Rental Assistance</i>				\$0.00
	Homelessness Prevention		\$0.00	\$25,000.00	\$25,000.00
	<i>Housing Relocation and Stabilization Services</i>			\$5,000.00	\$5,000.00
	<i>Tenant-Based Rental Assistance</i>			\$20,000.00	\$20,000.00
	<i>Project-Based Rental Assistance</i>				\$0.00
	Administration			\$7,084.37	\$7,084.37
	Emergency Solutions Grants Subtotal		\$0.00	\$68,311.00	\$68,311.00
		Total Grant Amount: \$96,442 + 68,311 =			\$164,753.00

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

Written Standards for the Provision of ESG Assistance

The City of Lowell's Written Standards for the Provision of Emergency Solutions Grant Assistance has been included as an attachment to this Substantial Amendment.

Making Sub-awards

Consistent with the City's Citizen Participation Plan, the Department of Planning and Development (DPD) advertised the availability of a Request for Proposal for the second allocation of FY2011-2012 ESG funds in February 2012 on the City's website: www.lowellma.gov, in the *Lowell Sun*, and through an email distribution lists of both subrecipients of Consolidated Plan funds, Continuum of Care members and HPRP subrecipients. An internal committee of DPD staff reviewed the proposals and made recommendations to the City Manager and City Council.

Homeless Participation Requirement

In accordance with § 576.405(b) of the Interim Rule on Emergency Solutions Grant funds, The City of Lowell has coordinated with the Lowell Continuum of Care to develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any ESG-funded facilities, services or other assistance.

In coordination with the five-year Consolidated Planning process, Department of Planning and Development staff will plan and implement panel discussions with current homeless or at-risk homeless clients at shelters and other provider locations throughout the city. During this process, DPD staff will outreach to partner organizations serving diverse subpopulations of homeless or at-risk homeless clients to organize small groups of clients willing to sit on these panels and discuss emerging or growing needs in the community. A short list of questions or topics for the panel members will be prepared ahead of time. Participation on these panels will allow individuals and families facing homelessness to discuss pressing issues directly with ESG administrators. As part of the outreach and planning stages of this process, DPD staff will be sure to target partner organizations that serve each of the unique subpopulations in the city (i.e., family shelters, shelters for individuals, service providers serving homeless or at-risk homeless youth, elderly, individuals with mental illness, etc.).

In addition to the panel discussions, ESG administrators will also implement strategies to include homeless or formally homeless individuals in the annual planning processes for ESG funds. In order to identify short-term priorities for ESG funding, DPD will network with its non-profit partners to identify previously or currently homeless individuals who can provide feedback and input to the ESG prioritization process. Many of these non-profit providers currently employ formerly homeless clients to provide peer-to-peer counseling to current homeless and at-risk homeless clients. These peer-counselors in particular will be sought out by DPD Staff for input for ESG planning purposes.

ESG administrators at the City of Lowell will continue to work with the Lowell CoC and other service providers to formulate strategies for the inclusion of homeless or formerly homeless individuals in this planning and prioritization process. Furthermore, DPD staff are currently coordinating with partner communities in Massachusetts to solicit ideas and approaches for

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

fulfilling this requirement. Additional information will be provided to HUD in future Annual Action Plans as strategies to implement this requirement are further developed.

Performance Standards

Performance Based Contracting:

The Department Planning and Development has implemented a Performance and Outcome Measurement System in order to quantify the effectiveness of programs and establish clearly defined outcomes. Using goals set by the subrecipients in their proposals for funding, The Department of Planning and Development drafts contracts which relate reimbursement specifically to accomplishments. Where possible, the focus is on outcome accomplishments rather than output accomplishments.

For example, a rapid re-housing program might be reimbursed based on the number of participants who actually attain stable, permanent housing as opposed to the number of people who receive case management services. In this example, if the subrecipient received \$10,000 and proposed to help 10 families attain permanent housing, a performance-based reimbursement system would allow them to invoice for \$1,000 for each family that moves into a new home.

Subrecipients are reimbursed *only* when they can provide accurate and appropriate documentation that demonstrates program accomplishments *and* can provide back-up documentation for eligible costs as spelled out in the contractual agreement. Subrecipients who do not accomplish their proposed goals are not reimbursed for their full grant amount, and funds are recaptured at fiscal year end and made available for other eligible ESG programs. Department of Planning and Development staff work closely with subrecipient organizations to ensure that these contract goals are reached. In the event of unforeseen obstacles, DPD staff are also willing to amend contractual goals when warranted.

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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

Date

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

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:

ATTACHMENT

To ensure that the City of Lowell's use of its second allocation of fiscal year 2011-2012 ESG funds complies with the expenditure limit for street outreach and emergency shelter, the following table has been included to notify HUD of the amount of FY 2010 grant funds that were committed for homeless assistance activities.

Table 1: Declaration of FY 2010 Grant Fund Commitments

Activity Type	Obligated Amount
Homeless Assistance	\$70,657.00
Homelessness Prevention	\$29,147.00
Administrative Activities	\$5,253.00
Total FY 2010 Award	\$105,057.00

Project Name: Community Teamwork, Inc.: SHIFT Coalition/ Lowell Homelessness Collaborative							
Description:	IDIS Project #: UOG Code: MA251284 LOWELL						
These funds will be used to pay for rent and utility arrears for clients in an effort to preserve the tenancy of clients who have the ability to be self-sufficient. The SHIFT Coalition will also act as an information and referral point to connect people to other agencies and existing resources in order to stabilize housing.							
Location: 17 Kirk St. Lowell MA 01852	Priority Need Category Select one: Homeless/HIV/AIDS ▼						
Expected Completion Date: 6/30/2013	National Objective: LMC Primary Purpose: Prevent Homelessness						
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives						
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve access to affordable rental housing ▼ 2. ▼ 3. ▼						
Project-level Accomplishments	01 People ▼	Proposed	30	FY 10-11	Accompl. Type: ▼	Proposed	
		Underway				Underway	
		Complete				Complete	
	01 People ▼	Proposed	28	FY 11-12 (1)	Accompl. Type: ▼	Proposed	
		Underway				Underway	
		Complete				Complete	
	01 People ▼	Proposed	30	FY 11-12 (2)	Accompl. Type: ▼	Proposed	
		Underway				Underway	
		Complete				Complete	
Proposed Outcome		Performance Measure		Actual Outcome			
05Q Subsistence Payments 570.204 ▼		Matrix Codes ▼		Matrix Codes ▼			
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼			
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼			
Program Year 2	ESG ▼	Proposed Amt.	\$20,000.00		Fund Source: ▼	Proposed Amt.	
		Actual Amount				Actual Amount	
	Other ▼	Proposed Amt.	\$182,000.00		Fund Source: ▼	Proposed Amt.	
	match	Actual Amount				Actual Amount	
	01 People ▼	Proposed Units	30		Accompl. Type: ▼	Proposed Units	
		Actual Units				Actual Units	
	Accompl. Type: ▼	Proposed Units			Accompl. Type: ▼	Proposed Units	
		Actual Units				Actual Units	

Project Name: Eliot Community Human Services- Aggressive Street Outreach (ASO)						
Description:	IDIS Project #: UOG Code: MA251284 LOWELL					
The Aggressive Street Outreach program will address the issue of obtaining permanent housing for unaccompanied, single homeless adults who are currently unsheltered in the City of Lowell by providing housing search and other case management services. These funds will also be used to cover first and last month's rent for the newly secured permanent housing.						
Location: Citywide	Priority Need Category Select one: Homeless/HIV/AIDS ▼					
Expected Completion Date: 6/30/2013	National Objective: LMC Primary Purpose: Prevent Homelessness					
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives					
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Increase the number of homeless persons moving into permanent housing ▼ 2. ▼ 3. ▼					
Project-level Accomplishments	01 People ▼	Proposed	10	Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	FY11-12	Proposed		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
	Accompl. Type: ▼	Proposed		Accompl. Type: ▼	Proposed	
		Underway			Underway	
		Complete			Complete	
Proposed Outcome		Performance Measure		Actual Outcome		
05Q Subsistence Payments 570.204 ▼		Matrix Codes ▼		Matrix Codes ▼		
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼		
Matrix Codes ▼		Matrix Codes ▼		Matrix Codes ▼		
Program Year 2	ESG ▼	Proposed Amt.	\$5,000.00	Fund Source: ▼	Proposed Amt.	
		Actual Amount			Actual Amount	
	Other ▼	Proposed Amt.	\$8,500.00	Fund Source: ▼	Proposed Amt.	
	match	Actual Amount			Actual Amount	
	01 People ▼	Proposed Units	10	Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	
	Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units	
		Actual Units			Actual Units	

Project Name: Eliot Community Human Services- Tenancy Preservation Program						
Description:	IDIS Project #: UOG Code: MA251284 LOWELL					
The Tenancy Preservation Program works with disabled individuals and families in housing court who are often facing eviction and homelessness. TPP staff work with the court, legal services, landlords, tenants and service providers to establish appropriate service plans aimed at stabilizing the tenancy and preventing homelessness.						
Location: Citywide	Priority Need Category Select one: Homeless/HIV/AIDS ▼					
Expected Completion Date: 6/30/2013	National Objective: LMC Primary Purpose: Prevent Homelessness					
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives					
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. Improve access to affordable rental housing ▼ 2. ▼ 3. ▼					
Project-level Accomplishments	01 People ▼	Proposed	10	Accompl. Type: ▼	Proposed	
	FY11-12	Underway			Underway	
		Complete			Complete	
		Accompl. Type: ▼	Proposed			Accompl. Type: ▼
		Underway			Underway	
		Complete			Complete	
		Accompl. Type: ▼	Proposed			Accompl. Type: ▼
		Underway			Underway	
		Complete			Complete	

Proposed Outcome	Performance Measure	Actual Outcome
05Q Subsistence Payments 570.204 ▼	Matrix Codes ▼	
Matrix Codes ▼	Matrix Codes ▼	
Matrix Codes ▼	Matrix Codes ▼	

Program Year 2	ESG ▼	Proposed Amt.	\$5,000.00	Fund Source: ▼	Proposed Amt.	
		Actual Amount		Actual Amount		
		Other ▼	Proposed Amt.	\$6,500.00	Fund Source: ▼	Proposed Amt.
	match	Actual Amount		Actual Amount		
	01 People ▼	Proposed Units	10	Accompl. Type: ▼	Proposed Units	
		Actual Units		Actual Units		
		Accompl. Type: ▼	Proposed Units		Accompl. Type: ▼	Proposed Units
		Actual Units		Actual Units		

Project Name: Lowell Transitional Living Center- Rapid Re-Housing and Stabilization Program						
Description:	IDIS Project #: <input type="text"/> UOG Code: MA251284 LOWELL					
The Lowell Transitional Living Center (LTLC) Rapid Re-housing Stabilization Program offers housing placement and time limited rental assistance along with individualized case management services that are client-centered. These funds will be used to cover first and last months rent for individuals who are rapidly re-housed.						
Location: 205-509 Middlesex St, Lowell MA 01852	Priority Need Category Select one: <input type="text" value="Public Services"/>					
Expected Completion Date:	National Objective: LMC Primary Purpose: Help the Homeless					
Objective Category <input type="radio"/> Decent Housing <input checked="" type="radio"/> Suitable Living Environment <input type="radio"/> Economic Opportunity	Specific Objectives					
Outcome Categories <input checked="" type="checkbox"/> Availability/Accessibility <input type="checkbox"/> Affordability <input type="checkbox"/> Sustainability	1. <input type="text" value="Improve economic opportunities for low-income persons"/> 2. <input type="text"/> 3. <input type="text"/>					
Project-level Accomplishments	01 People <input type="text"/> Proposed 5	Accompl. Type: <input type="text"/>	Proposed	Accompl. Type: <input type="text"/>	Proposed	
	Underway		Underway			
	Complete		Complete			
	FY11-12	Accompl. Type: <input type="text"/>	Proposed	Accompl. Type: <input type="text"/>	Proposed	
	Underway		Underway			
	Complete		Complete			
	Accompl. Type: <input type="text"/>	Accompl. Type: <input type="text"/>	Proposed	Accompl. Type: <input type="text"/>	Proposed	
	Underway		Underway			
	Complete		Complete			
	Accompl. Type: <input type="text"/>	Accompl. Type: <input type="text"/>	Proposed	Accompl. Type: <input type="text"/>	Proposed	
	Underway		Underway			
	Complete		Complete			
Proposed Outcome		Performance Measure		Actual Outcome		
<input type="text"/>		<input type="text"/>		<input type="text"/>		
05Q Subsistence Payments 570.204 <input type="text"/>		Matrix Codes <input type="text"/>		Matrix Codes <input type="text"/>		
Matrix Codes <input type="text"/>		Matrix Codes <input type="text"/>		Matrix Codes <input type="text"/>		
Matrix Codes <input type="text"/>		Matrix Codes <input type="text"/>		Matrix Codes <input type="text"/>		
Program Year 2	ESG <input type="text"/>	Proposed Amt.	\$6,266.63	Fund Source: <input type="text"/>	Proposed Amt.	<input type="text"/>
		Actual Amount	<input type="text"/>		Actual Amount	<input type="text"/>
	Other <input type="text"/>	Proposed Amt.	\$40,500.00	Fund Source: <input type="text"/>	Proposed Amt.	<input type="text"/>
	match <input type="text"/>	Actual Amount	<input type="text"/>		Actual Amount	<input type="text"/>
	01 People <input type="text"/>	Proposed Units	5	Accompl. Type: <input type="text"/>	Proposed Units	<input type="text"/>
		Actual Units	<input type="text"/>		Actual Units	<input type="text"/>
	Accompl. Type: <input type="text"/>	Proposed Units	<input type="text"/>	Accompl. Type: <input type="text"/>	Proposed Units	<input type="text"/>
		Actual Units	<input type="text"/>		Actual Units	<input type="text"/>



City of Lowell
Department of Planning and Development

*Written Standards for Provision of Emergency
Solutions Grant Assistance*

May 2012

Table of Contents

Overview and Purpose of the Written Standards.....	p. 2
A.) Standard Policies and Procedures for Evaluating Individuals’ and Families’ Eligibility for Assistance under ESG.....	p. 2
B.) Policies and Procedures for Coordination among Emergency Shelter Providers, Essential Service Providers, Homelessness Prevention and Rapid Re-Housing Service Providers, Other Homelessness Assistance Providers, and Mainstream Service and Housing Providers	p. 5
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.....	p. 6
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.....	p. 7
E.) Standards for Determining How Long a Particular Program Participant will be provided with Financial Assistance and whether and How the Amount of that Assistance will be Adjusted Over Time.....	p. 7
F.) Standards for Determining the Type, Amount, and Duration of Housing Stabilization and/or Housing Relocation Services to Provide a Program Participant.....	p. 9

ATTACHMENTS

1. Summary of Eligible Activities under ESG including Documentation Requirements by Activity-type
2. Required forms for ESG Documentation: Documentation of Homeless Status Form; Declaration of Income Form; HMIS Data Collection Forms; 3-month Re-Certification of Eligibility form; Housing Habitability Standards Checklist; Rent Reasonableness Checklist

Overview and Purpose of the Written Standards

In accordance with 24 CFR 91.220(l)(4)(i) and 567.400(e)(1), The City of Lowell's Department of Planning and Development has developed the following written standards for the provision and prioritization of Emergency Solutions Grant (ESG) funding.

The City of Lowell is awarded ESG funds annually from the Department of Housing and Urban Development as part of the Annual Action Plan Process. These funds, which are distributed as part of an annual competitive RFP process, are designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, including major revisions to the Emergency Shelter Grants program, now the Emergency Solutions Grants (ESG) program. The HEARTH Act incorporated many of the lessons learned from the implementation of the Homelessness Prevention and Rapid Re-Housing Recovery Act Program (HPRP) into the new ESG program, including placing a stronger emphasis on homelessness prevention and rapid re-housing assistance.

While still an eligible cost-type under these funds, the new ESG places less of an emphasis on providing shelter operating costs or essential shelter services to subrecipients. In line with HUD's national homelessness policy as outlined in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, federal programs aimed at ending homelessness have shifted away from providing shelter support and are now geared towards providing stable, permanent housing opportunities for the homeless and at-risk homeless.

Additionally, The City of Lowell's 10-Year Plan to End Homelessness: *Partnership for Change: Action Plan to Ending Homelessness*, adopted in July 2008, was used for a guide in developing these standards. The 10-Year Plan provides a broad roadmap to assess the current system of "managing" homelessness and explore the new, more innovative and cost effective "prevention" and "housing first" approaches that are greatly reducing and/or eliminating homelessness in the community.

The new ESG program allows each city and town administering these funds to set priorities based on the individualized needs of the community. These standards serve to outline the specific guidelines and priorities that will be used by the City of Lowell's Department of Planning and Development in awarding and administering ESG funding.

A.) Standard Policies and Procedures for Evaluating Individuals' and Families' Eligibility for Assistance under ESG

The following eligibility criteria must be met in order for an individual or family to be provided with ESG assistance:

- 1) The individual or family must reside within the Lowell City limits, in a Lowell homeless shelter, or be relocated from an outside shelter to Lowell.

- 2) Program participants must meet the definition of homeless or at-risk homeless as spelled out in 24 CFR 576.2:

Homeless means:

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

- (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); <or>
- (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

<or>

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

- (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- (ii) No subsequent residence has been identified; <and>
- (iii) The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;

<or>

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; <and>
- (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

<or>

(4) Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- (ii) Has no other residence; <and>
- (iii) Lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, to obtain other permanent housing.

At risk of homelessness means:

(1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD; **<and>**
- (ii) 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 in this section; **<and>**
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); **<or>**
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

<or>

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15));

<or>

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

- 3) Income guidelines: as noted in the definitions above, clients who are at-risk of homelessness must have an income **at or below 30% of the area medium income** to qualify for ESG assistance. Income for clients who are literally homeless must also be documented in case files and must also be at or below 30% of the area medium income to qualify for this assistance.
- 4) The individual or family provided must have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs. At this initial consultation, long-term strategies for ensuring stable housing should be covered with the client. HUD encourages ineligible persons be referred to appropriate resources or service providers that can assist them.
- 5) HMIS participation is a mandatory ESG requirement. All clients receiving ESG assistance must be reported in an approved HMIS system.

- 6) All clients receiving ESG assistance must be re-certified as eligible **every three months**. ESG clients receiving more than three months of assistance must have documentation of re-certification of their eligibility for assistance included in their case file.

B.) Policies and Procedures for Coordination among Emergency Shelter Providers, Essential Service Providers, Homelessness Prevention and Rapid Re-Housing Service Providers, Other Homelessness Assistance Providers, and Mainstream Service and Housing Providers

In the development and continual refinement of these written standards, Department of Planning and Development staff coordinated with homeless and at-risk homeless service providers in the following ways:

Coordination with the Continuum of Care:

The City's Department of Planning and Development (DPD) is the Lead Entity for the Lowell Continuum of Care (CoC). With oversight from a Community Development Specialist from DPD, nonprofit organizations in Lowell that are members of the CoC are working to provide services to help increase the self-sufficiency of homeless persons and those with issues of mental illness, substance abuse, domestic violence and disabilities that are at-risk of homelessness. The CoC continues to operate a Homeless Management Information System (HMIS), which has been installed at five homeless provider locations. Data is collected annually to create a Housing Gaps Analysis Chart that is used by the community to determine the unmet need for emergency shelters, transitional housing programs and permanent housing sites for homeless persons. Current Lowell CoC Member Organizations are:

- Alternative House
- Bridgewell, Inc./ Pathfinder
- Community Teamwork, Inc.- Housing Consumer Education Center
- Community Teamwork, Inc.- Shelter Programs
- Crescent House
- House of Hope
- Lowell Housing Authority
- Lowell Transitional Living Center
- The Princeton House
- United Teen Equality Center
- Vinfen

To increase the level of coordination between the CoC and the city's homeless programs, staff responsible for the administration of the ESG program are now attending CoC meetings on a regular basis. Input and data from CoC members has been integrated throughout these Written Standards and was a main point of reference in formulating the prioritization standards outlined in Section C. Direct interactions with CoC service providers has allowed DPD staff to prioritize funding in support of the needs that are not currently being addressed by other federal, state and local funding sources.

Survey for Homeless and At-Risk Homeless Service Providers:

In addition to a higher level of coordination with the CoC, a survey was distributed to homeless and at-risk homeless service providers to solicit feedback from organizations or programs that may not be a part of the CoC. The purpose of this survey was to identify and better understand the most pressing needs of the homeless population in Lowell at present. Particular emphasis was placed on identifying sub-populations of homeless or at-risk homeless individuals that are growing or have disproportionate needs at present. Additionally, service providers were asked to identify areas of need that are not currently being addressed by other federal, state or local funding sources. Feedback from this survey was incorporated into the prioritization standards outlined in Section C.

As a means of keeping these Written Standards current and effective, similar short surveys will be reviewed by the CoC on a regular basis. Surveys should be aimed at identifying new or emerging needs in the homeless or at-risk homeless community.

Outreach to Homeless or At-risk homeless Service providers Outside the Continuum: In order to ensure that the full range of homeless or at-risk homeless individuals and families are being targeted for use of these funds, Department of Planning and Development staff also conducted outreach to homeless and at-risk homeless service providers outside of the Continuum of Care. Targeted focus was given to service providers working with specific populations of clients who are currently not serviced with ESG dollars. Organizations serving veterans, youth, elderly, the mentally disabled and substance abusers were targeted during this outreach process. Outreach activities include surveying these organizations to get a better understanding of the services they provide and the distinct needs of the populations they serve. Outreach also includes informing these organizations of the availability of new rounds of ESG funding.

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

The resources available to address the needs of homeless and at-risk homeless populations are currently in flux. Federal, state and local programs aimed at assisting these vulnerable populations have recently undergone major changes and are expected to continue to fluctuate in the near future. In reference to the patchwork of various services and resources that are currently available, service providers indicated that HPRP—with its many eligible activities—helped to fill some of the gaps in service. These funds also prevented clients who were ineligible for other service-types from falling through the cracks. Therefore, feedback from homeless and at-risk homeless service providers in the City of Lowell has indicated that ESG funding will best serve the local community if it remains as flexible and open as possible. Lowell has a strong network of providers working with homeless and at-risk homeless populations in the city. Moving forward, DPD staff will continue to work with these service providers to ensure that the ESG program remains effective at addressing the changing needs of the community.

Despite the stressed need to make ESG funding as flexible as possible, several priority areas were identified as a result of coordination with the CoC, feedback from HPRP subrecipients, a survey and

outreach to other homeless or at-risk homeless service providers. This feedback indicated that the following populations should be given priority for funding under the new ESG program:

1. Substance abuse and mental illness remain predominant barriers in combating homelessness in Lowell.
2. A significant number of homeless individuals in Lowell are also victims of domestic violence.
3. In the past year, the city of Lowell has witnessed an increase in the number of youth/ young adults and elderly homeless individuals. These populations both have unique needs that require specialized services.
4. In line with HUD priorities, veterans will also be targeted for use of these funds.

As a result of the obstacles identified above and due to shortages in other resources, funding for extended case management services should be a high priority area for ESG funds. Ideally, in order to maintain stable housing and avoid crisis-situations, clients require on average approximately 18 months of continuous case management to transition to a more stable housing situation. Ideally, 24 months of case management is optimal to give the client the best chance of staying stably housed after services are terminated.

In addition to the specific populations listed above, specific re-occurring barriers were identified in preventing homeless individuals and families from obtaining and maintain stable permanent housing. These barriers include:

1. Lack of a stable sufficient income remains the primary obstacle in securing stable housing for homeless and at-risk populations in Lowell.
2. Unemployment, lack of marketable job skills and the strained economy present a series of significant obstacles to individuals and families who are currently homeless or at-risk of homelessness.

Lastly, HUD strongly encourages jurisdictions to target funding toward assisting individuals and families living on the streets and in emergency shelter. Therefore, in accordance with the City of Lowell's 10-Year Plan, individuals who are currently homeless—especially those who have been chronically homeless—should be targeted for use of these funds. Clients who do not have prospects to become stably housed in the near future should not be turned away from ESG assistance. Instead, case managers should work closely with these individuals to identify and overcome key barriers to obtaining permanent stable housing. DPD encourages service providers to communicate with city staff as new or pressing barriers are identified amongst the chronically homeless population so that new strategies for ESG use can be prioritized.

Department of Planning and Development staff will update these priority areas as new trends and patterns in the homeless and at-risk homeless community emerge.

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

The City of Lowell will not mandate that clients receiving ESG assistance pay a specific portion of their total rent with other sources. However, limits will be placed on the amount of funds that will be made available for direct financial assistance provided through this program. (see Section E for these limits) Whenever possible, ESG direct financial assistance should be provided to cover *only a portion* of the total cost-type; clients should be encouraged to come up with sustainable ways to

supplement this financial assistance. Direct financial assistance can be used to cover the entire cost of rent or utilities *only* in cases where the client has been chronically homeless and does not have any resources or income to supplement the financial assistance.

E.) Standards for Determining How Long a Particular Program Participant will be provided with Financial Assistance and whether and How the Amount of that Assistance will be Adjusted Over Time

All forms of direct financial ESG assistance will be limited to the **12 month fiscal year (July 1-June 30)**. Should an organization receive grants in two fiscal years for the same service type, clients are eligible for extended service **not to exceed a total of 18 months**. All clients receiving direct financial assistance must provide their case manager with a copy of their lease or rental agreement to be kept on file. Rent Reasonableness and Housing Habitability Standard screenings must be conducted *prior* to providing direct financial assistance, must be documented in the case file, and are the responsibility of the sub-grantee. ESG funds used to pay direct assistance must be issued to a third party. In order to qualify for the following forms of assistance, the client cannot already be receiving assistance of the same cost-type from an alternative source. Whenever possible, ESG direct financial assistance should be provided to cover *only a portion* of the total cost-type; clients should be encouraged to come up with sustainable ways to supplement this financial assistance. As a best practice, organizations receiving ESG funds for direct financial assistance should budget their awards to achieve a balance between distributing funds to as many clients as possible while ensuring that the assistance provided to each individual will be sufficient to obtain or maintain stable housing. Additional limitations for specific types of assistance apply and are outlined below.

Eligible types of direct financial assistance are:

Homelessness Prevention Direct Financial Assistance:

Under the Homelessness Prevention category, direct financial assistance can be made available to clients who are “at-risk” for homelessness, as spelled out in the definition in Section A. Please note that clients can **either** be provided with start-up costs (rental and/or utility arrearages) **<or>** medium term rental subsidies- but **not both**. Also, clients receiving start-up costs (rental and/or utility arrearages) are only eligible for this benefit on a **one-time basis per client per lifetime**.

- **Rental Arrears***: Rental arrears can be covered using ESG funds if and when the provision of these funds will allow clients to stay in their homes or move into a new unit. ESG funds that are provided for this cost-type are only to be made on a **one-time basis per client per lifetime** and **can only cover up to six (6) months of back-rent**. Clients receiving this benefit will not be eligible for medium-term rental subsidies.
- **Utility Arrears***: Utility arrears can be covered using ESG funds if and when paying such arrears will allow clients to stay in their home or move into a new unit. Each eligible client or family can be provided **up to six (6) months of back- utilities** for the purpose of preventing homelessness. This form of assistance is only to be made available on a **one-time basis per client per lifetime**. Clients receiving this benefit will not be eligible for medium-term rental subsidies.

**Please note:* Sub-grantees using ESG funds for payment of a client’s back-rent or back-utilities should negotiate with landlords and utility companies to forgive or reduce the arrearage payments. A 10% reduction is suggested. Staff should document all attempts to reduce arrearages on behalf of the program participant in the case files.

- Short or Medium Term Rental Subsidies: Short or medium term rental subsidies paid by ESG funds should only be used to cover a portion of the client’s total rent. The percentage of rent covered by ESG funds is to be determined by the case manager and should include considerations of the client’s long-term prospects for becoming self-sufficient. Rental subsidies **can only be provided during the fiscal year of the grant (July 1-June 30) UNLESS an organization receives two consecutive ESG grants for the same cost-type, in which case medium term rental subsidies can be provided for up to 18 months.** Clients provided with this type of assistance must be receiving case management services (either through ESG or an alternative homelessness program) and must have a workable plan in place to become self-sufficient once the subsidy benefit expires. This plan is to be documented in the client’s individual case file. When possible, case managers should also work with clients receiving this benefit to develop a plan whereby rental subsidies will decrease as the client prepares to become self-sufficient from this subsidy.

Rapid Re-Housing Programs Direct Financial Assistance:

Under the Rapid Re-housing category, clients who meet the definition for “homeless” as spelled out in Section A above will qualify for the following forms of direct financial assistance. Please note that qualifying individuals and families are only eligible for the following payments on a **one-time basis per client per lifetime**. Also, Rapid Re-Housing Assistance should be targeted towards families or individuals who have strong prospects of remaining stably housed after moving into their new home.

1. First and Last Month’s Rent: **One-time payments not to exceed \$2,500 per client** can be made available using ESG funds to cover first and last month’s rent for eligible individuals or families moving into a new residence. Clients receiving this benefit will not be eligible for medium-term rental subsidies provided under the homelessness prevention category of this funding source.
2. Security Deposits: **One-time payments not to exceed \$1,000 per client** can be provided to cover security deposits for homeless individuals or families moving into a new residence. Clients receiving this benefit will not be eligible for medium-term rental subsidies provided under the homelessness prevention category of this funding source. *Please note:* Security deposits must be returned to the organization when the assisted tenant leaves the unit. Because of this requirement, organizations must maintain accurate records of all security deposits provided to clients. A “good faith effort” must be made to recover program funds upon the departure of the beneficiary from the unit.
3. Moving Costs: **One-time payments not to exceed \$1,000 per client** can be provided to cover moving costs for homeless individuals or families moving into a new residence. Funds may be used for reasonable moving costs, such as truck rental or hiring a moving company. Payments in this category can only be paid to a third-party. Clients receiving this benefit will

not be eligible for medium-term rental subsidies provided under the homelessness prevention category of this funding source.

4. Short or Medium Term Rental Subsidies: In cases where clients are re-housed and do not have immediate prospects of becoming self-sufficient, short or medium term rental subsidies may be provided with these funds. Rental subsidies paid by ESG funds should only be used to cover a portion of the client's total rent. The percentage of rent covered by ESG funds is to be determined by the case manager and should include considerations of the client's long-term prospects for becoming self-sufficient. Rental subsidies **can only be provided during the fiscal year of the grant (July 1-June 30) UNLESS an organization receives two consecutive ESG grants for the same cost-type, in which case medium term rental subsidies can be provided for up to 18 months.** Clients provided with this type of assistance must be receiving case management services (either through ESG or an alternative homelessness program) and must have a workable plan in place to become self-sufficient once the subsidy benefit expires. This plan is to be documented in the client's individual case file. When possible, case managers should also work with clients receiving this benefit to develop a plan whereby rental subsidies will decrease as the client prepares to become self-sufficient from this subsidy.

F.) Standards for Determining the Type, Amount, and Duration of Housing Stabilization and/or Housing Relocation Services to Provide a Program Participant

ESG funds can be used to cover costs associated with providing homeless or at-risk homeless clients with housing relocation and stabilization services. Funds in this category will primarily cover case manager salaries. Duration of Housing Stabilization and/or Housing Relocation Services **must be completed by fiscal-year end (June30)**. Sub-grantees that receive ESG grants in consecutive fiscal years may continue to serve clients with these services over the course of two fiscal years, but must limit the duration of this service to **no more than 24 months**.

Eligible types of ESG services include:

Homelessness Prevention Services:

- General Case Management: Funds may be used for clients qualifying as "at-risk" for homelessness for activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them to remain stably housed. Under this category, case managers should work with eligible clients to formulate a long-term plan for maintaining stable housing. Component services and activities may include: counseling; developing, securing, and coordinating services; monitoring and evaluating program participant progress; assuring program participants' rights are protected; developing an individualized housing and service plan, including a path to permanent housing stability subsequent to ESG financial assistance.
- Housing Search and Placement: Clients who meet the definition of "at-risk" for homelessness as outlined in Section A & who due to circumstances outside their control are being forced to relocate qualify for housing search and placement services. Funds may be

used for services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable housing. Component services or activities may include: tenant counseling; assisting individuals and families to understand leases; securing utilities; making moving arrangements; representative payee services concerning rent and utilities; mediation and outreach to property owners related to locating or retaining housing.

Rapid Re-Housing Services:

- General Case Management: Funds may be used for clients qualifying as “homeless” for activities including the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them to obtain permanent, stable housing. Under this category, case managers should work with eligible clients to formulate a long-term plan for maintaining stable housing. Component services and activities may include: counseling; developing, securing, and coordinating services; monitoring and evaluating program participant progress; assuring program participants’ rights are protected; developing an individualized housing and service plan, including a path to permanent housing stability subsequent to ESG financial assistance.
- Housing Search and Placement: Clients who meet the definition of “homeless” as spelled out in Section A qualify for housing search and placement services. Funds may be used for services or activities designed to assist individuals or families in locating and obtaining suitable housing. Component services or activities may include: tenant counseling; assisting individuals and families to understand leases; securing utilities; making moving arrangements; representative payee services concerning rent and utilities; mediation and outreach to property owners related to locating or retaining housing.
- Outreach & Engagement: Funds may be used for services or assistance designed to publicize the availability of programs to make persons who are homeless aware of these and other available services and programs.

Emergency Solutions Grant Program (ESG)

SUMMARY OF ELIGIBLE ACTIVITIES **

Homelessness Prevention Activities	
Direct Financial Assistance	Housing Relocation and Stabilization Services
<ul style="list-style-type: none"> • Rent Arrearages • Utility Arrearages • Medium-Term Rental Subsidies 	<ul style="list-style-type: none"> • General Case Management • Housing Search and Placement

Rapid Re-housing Activities	
Direct Financial Assistance	Housing Relocation and Stabilization Services
<ul style="list-style-type: none"> • First/Last Months Rent • Security Deposits • Moving Costs 	<ul style="list-style-type: none"> • General Case Management • Housing Search and Placement • Outreach & Engagement

Shelter Expenses*	
Operating Expenses	Essential Services
<i>Includes:</i> Shelter Rent, Maintenance, Insurance, Utilities, and Furnishings	Essential services can address the immediate needs of homeless persons living on the street, in emergency shelter or in transitional housing, and can help enable homeless persons become more independent.

*Under the new Emergency Solutions Grant program, a cap has been placed on the amount of funds that can be used for shelter operating costs. Furthermore, in accordance with federal strategies on ending homelessness and the City of Lowell's 10-Year Plan, priority for ESG funding will be given to activities related to preventing homelessness and rapidly re-housing individuals who are currently homeless.

**Please note: if an organization identifies a pressing or emerging need amongst the homeless or at-risk homeless community in Lowell that can be addressed via an eligible use of ESG funds not included above, Department of Planning and Development staff are willing to consider such projects for funding under a special projects category.

Documentation Requirements for All Clients Receiving ESG Assistance

All clients receiving ESG assistance must have the following documentation included in their case file:

1. Documentation of Homeless or At-risk Homeless Status
2. Documentation of income (when possible, if not- self declaration of income forms will suffice)
3. In the form of case notes, evidence of *at least* an initial consultation with a case manager including a needs assessment and formulation of a long-term plan for housing stability.
4. At Program Entry- HMIS Intake form
5. At Program Exit- HMIS Exit form
6. For clients receiving 3 or months of service: 3 Month Re-certification of Eligibility form

Additional Documentation Requirements by Activity-type

Direct Financial Assistance: All clients provided with ESG assistance in the form of direct financial support (i.e., first last months rent, security deposits, moving costs, rental arrearages, utility arrearages or medium-term rental subsidies) must have the following documentation included in their case file:

1. Lease or Rental Agreement
2. Rent Reasonableness Checklist
3. Housing Habitability Standards Checklist

Housing Relocation and Stabilization Services: All clients receiving Housing Relocation and Stabilization Services (i.e., General Case Management, Housing Search and Placement, Outreach and Engagement) must have case files with detailed case notes indicating the developments and progress made as a result of the ESG-funded services.

Emergency Solutions Grant Program (ESG)
SELF-DECLARATION OF HOMELESS STATUS

ESG Applicant Name: _____

- Household without dependent children (complete one form for each adult in the household)
 - Household with dependent children (complete one form for household)
- Number of persons in the household: _____

This is to certify that the above named individual or household is currently homeless or at-risk of homelessness, based on the following and other indicated information and the signed declaration by the applicant.

Check only one:

- I [and my children] currently qualify as “homeless” as spelled out in the definition below.
- I [and my children] currently qualify as “at-risk homeless” as spelled out in the definition below.

I certify that the information above and any other information I have provided in applying for ESG assistance is true, accurate and complete.

ESG Applicant Signature: _____ Date: _____

ESG Staff Certification

I understand that third-party verification is the preferred method of certifying homelessness or risk for homelessness for an individual who is applying for ESG assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt made for third-party verification:

ESG Staff Signature: _____ Date: _____

Definitions

Homeless means:

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

- (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
- (ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); **<or>**
- (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

<or>

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

- (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
- (ii) No subsequent residence has been identified; **<and>**
- (iii) The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;

<or>

(3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

- (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
- (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
- (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; **<and>**
- (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment;

<or>

(4) Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- (ii) Has no other residence; **<and>**
- (iii) Lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, to obtain other permanent housing.

At risk of homelessness means:

(1) An individual or family who:

- (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
<and>
- (ii) 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 in this section; <and>
- (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); <or>
 - (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

<or>

(2) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e–2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15));

<or>

(3) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Emergency Solutions Grant Program (ESG)

SELF-DECLARATION OF INCOME

ESG Applicant Name: _____

This is to certify the income status for the above named individual. Income includes but is not limited to:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation of a business, i.e., total revenue minus business operating expenses. This also includes any withdrawals of cash from the business or profession for your personal use.
- Monthly interest and dividend income credited to an applicant's bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
- Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.

Check only one box and complete only that section

I certify, under penalty of perjury, that I currently receive the following income:

Source: _____ Amount: _____ Frequency: _____
Source: _____ Amount: _____ Frequency: _____
Source: _____ Amount: _____ Frequency: _____

ESG Applicant Signature: _____ Date: _____

I certify, under penalty of perjury, that I do not have any income from any source at this time.

ESG Applicant Signature: _____ Date: _____

ESG Staff Verification

I understand that third-party verification is the preferred method of certifying income for ESG assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt made for third-party verification:

ESG Staff Signature: _____ Date: _____

Emergency Solutions Grant Program (ESG) 3-MONTH RE-CERTIFICATION OF ELIGIBILITY

ESG Client Name: _____

Today's Date: _____

How many total months of service has the client received to date? _____

(Note: count all ESG service types- including all forms for financial assistance and case management)

HOUSEHOLD INFORMATION

Has any of the client's contact information changed in the past three months? Yes No (If yes, please provide updated information below)

CURRENT STREET ADDRESS: _____ APT. #: _____

CITY: _____ STATE: _____ ZIP CODE: _____

PHONE: _____ EMAIL: _____

Has the Client's household composition changed since program entry? Yes No (If yes, please provide updated information below)

TOTAL # OF PEOPLE IN THE HOUSEHOLD: _____

OF ADULTS IN THE HOUSEHOLD: _____

OF CHILDREN UNDER THE AGE OF 18 CURRENTLY RESIDING IN THE HOUSEHOLD: _____

HOMELESSNESS STATUS INFORMATION

Have there been any changes to the client's homelessness status in the past three months? Yes No (If yes, please complete a new & updated *ESG Self Declaration of Homeless Status Form* and attach to this form.)

INCOME INFORMATION

Have there been any changes to the client's income in the past three months? Yes No (If yes, please complete a new & updated *ESG Income Declaration Form* and attach to this form.)

OTHER CHANGES TO CLIENT STATUS THAT RELATE TO ESG ELIGIBILITY

Please use the space below to discuss any additional changes to the client's status that have occurred over the past three months as it relates to eligibility for ESG services:

ESG STAFF VERIFICATION

I understand that third-party verification is the preferred method of certifying eligibility for ESG assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification. To the best of my knowledge, all of the above information is true.

ESG Staff Signature: _____

Date: _____

Emergency Solutions Grant Program (ESG)

HOUSING HABITABILITY STANDARDS INSPECTION CHECKLIST

ESG Applicant Name: _____

About this Tool

These standards apply only when a program participant is receiving financial assistance and moving into a new (different) unit. Inspections must be conducted upon initial occupancy and then on an annual basis for the term of ESG assistance.

The habitability standards are different from the Housing Quality Standards (HQS) used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a grantee could use either standard. In contrast to HQS inspections, the habitability standards do not require a certified inspector. As such, ESG program staff could conduct the inspections, using a form such as this one to document compliance.

Instructions: Mark each statement as 'A' for approved or 'D' for deficient. The property must meet all standards in order to be approved. A copy of this checklist should be placed in the client file.

Approved or Deficient	Element
	1. <i>Structure and materials:</i> The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and so as to protect the residents from hazards.
	2. <i>Access:</i> The housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.
	3. <i>Space and security:</i> Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided with an acceptable place to sleep.
	4. <i>Interior air quality:</i> Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.
	5. <i>Water Supply:</i> The water supply must be free from contamination.
	6. <i>Sanitary Facilities:</i> Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
	7. <i>Thermal environment:</i> The housing must have adequate heating and/or cooling facilities in proper operating condition.

	8. <i>Illumination and electricity</i> : The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
	9. <i>Food preparation and refuse disposal</i> : All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
	10. <i>Sanitary condition</i> : The housing and any equipment must be maintained in sanitary condition.
	<p>11. <i>Fire safety</i>: Both conditions below must be met to meet this standard.</p> <ul style="list-style-type: none"> a. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing-impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. b. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, day care centers, hallways, stairwells, and other common areas.

CERTIFICATION STATEMENT

I certify that I am not a HUD certified inspector and I have evaluated the property located at the address below to the best of my ability and find the following:

- Property meets all of the above standards.
- Property does not meet all of the above standards.

Therefore, I make the following determination:

- Property is approved.
- Property is not approved.

Case Name: _____			
Street Address: _____			
Apartment: _____	City: _____	State: _____	Zip: _____
Evaluator's Signature: _____		Date: _____	
Please Print. Name: _____			
Exec. Dir. Initial: _____			

**Emergency Solutions Grant Program (ESG)
RENT REASONABLENESS INSPECTION CHECKLIST**

ESG Applicant Name: _____

Checklist/Certification

	Proposed Unit	UNIT #1	UNIT #2	UNIT #3
ADDRESS				
NUMBER OF BEDROOMS				
SQUARE FEET				
TYPE OF UNIT/CONSTRUCTION				
HOUSING CONDITION				
LOCATION/ACCESSIBILITY				
AMENITIES				
UNIT:				
SITE:				
NEIGHBORHOOD:				
AGE IN YEARS				
UTILITIES (TYPE)				
UNIT RENT				
UTILITY ALLOWANCE				
GROSS RENT				
HANDICAP ACCESSIBLE?				

CERTIFICATION:

RENT REASONABLENESS

Based upon a comparison with rents for comparable units, I have determined that the proposed rent for the unit [] is / [] is not reasonable.

NAME:	SIGNATURE:	DATE:
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Notes on Determining Rent Reasonableness

HUD's standard for rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same period for comparable units in the private, unassisted market and must not be in excess of rents being charged by the owner during the same period for comparable non-luxury unassisted units.

Determination criteria:

- Location
- Quality
- Size
- Type
- Age of unit
- Amenities, housing services, maintenance, and utilities provided by the owner

Comparing rents:

- Market study
- Reviewing comparable units advertised for rent
- Note from property owner verifying comparability of charged rents to other units owned