

Community Resources Management Division

**FY 2011 Action Plan
Emergency Solutions Grant
(ESG)
Substantial Amendment**



**Substantial Amendment to
Clark County's FY 2010-2014 Consolidated Plan and
2011 Action Plan for Housing and Community Development**

Overview

The Emergency Solutions Grant program (ESG) is administered by Clark County to help non-profit organizations provide emergency overnight and day shelter, offer supportive services for homeless families and individuals and implement effective homeless prevention and rapid re-housing initiatives in collaboration with the Southern Nevada Continuum of Care.

Prior to the reauthorization of HUD McKinney-Vento programs (HEARTH Act), the program was known as the Emergency Shelter Grant. Among other changes, the HEARTH Act amends the program name to Emergency Solutions Grant, updates the definition of homelessness, requires increased coordination and collaboration between the ESG Grantee and the local Continuum of Care (CoC), requires adoption of performance and outcome measures and encourages Grantees to build on successful homelessness prevention and rapid re-housing strategies developed through ARRA-funded Homelessness Prevention and Rapid Re-Housing Program (HPRP).

Clark County is receiving a second allocation (Phase II) of ESG program funds for FY 2011 of \$157,908, whose allocation to projects is the purpose of this Substantial Amendment.

Specific Objectives 91.215(a)(4)

Consolidated Plan Outcomes and Objectives

Objectives/Goals	Availability/Accessibility	Affordability	Sustainability
Decent Housing	DH-1	DH-2	DH-3
Suitable Living Environment	SL-1	SL-2	SL-3
Economic Opportunity	EO-1	EO-2	EO-3

HCP CONSORTIUM HOMELESS STRATEGIC PLAN

Availability, Accessibility and Affordability of Housing, Public Services and Facilities for Homeless

Availability/Accessibility of Decent Housing (DH-1) Opening the Back Door out of Homelessness					
Specific Objective		Source of Funds	Year	Performance Indicators	Expected Number
DH 1.3	Expand the availability of affordable permanent housing with supportive services for homeless and formerly homeless individuals and families	HOME, LIHTF, Bonds, LIHTC, NSP	2010	Completed units or beds	16
			2011		20
			2012		20
			2013		40
			2014		40
			MULTI-YEAR GOAL	136	

DH 1.4	Maintain the supply of emergency shelter and transitional housing for homeless (updated from original FY 2010-2014 Consolidated Plan)	ESG, OAG	2010	People Assisted	3,400
			2011		3,400
			2012		3,400
			2013		3,400
			2014		3,400
			MULTI-YEAR GOAL		17,000
DH 1.5	Expand access to rapid re-housing programs, especially for youth, families, veterans and chronically homeless (updated from original FY 2010-2014 Consolidated Plan)	ESG, HPRP	2010	People Assisted	0
			2011		0
			2012		8
			2013		30
			2014		50
			MULTI-YEAR GOAL		88
DH 1.6	Support provision of essential services necessary to reach out to unsheltered homeless people to connect them with emergency shelter, housing or critical services (updated from original FY 2010-2014 Consolidated Plan)	ESG	2010	People Assisted	0
			2011		0
			2012		0
			2013		30
			2014		60
			MULTI-YEAR GOAL		90
Affordability of Decent Housing (DH-2) Closing the Front Door to Homelessness					
Specific Objective		Source of Funds	Year	Performance Indicators	Expected Number
DH 2.3	Prevent homelessness whenever possible. Improve the availability of prevention programs and expand the types of prevention strategies.	ESG, HPRP, County Funds	2010	People Assisted	500
			2011		400
			2012		100
			2013		100
			2014		100
			MULTI-YEAR GOAL		1,200
DH 2.4	Provide people at risk of homelessness with wraparound services to keep the client in safe, affordable housing and address health and wellness issues	ESG, HPRP, County Funds	2010	People Assisted	200
			2011		100
			2012		100
			2013		100
			2014		100
			MULTI-YEAR GOAL		600
Availability/Accessibility of Suitable Living Environment (SL-1)					
Specific Objective		Source of Funds	Year	Performance Indicators	Expected Number
SL 1.1	Provide homeless individuals and families with services that will help them regain self-sufficiency including job training, GED assistance, health care, child care assistance, transportation assistance, etc.	ESG, HPRP, County Funds	2010	People Assisted	400
			2011		400
			2012		400
			2013		400
			2014		400
			MULTI-YEAR GOAL		2,000

Consolidated Plan Priorities Updated

Within both the rapid re-housing and the homeless prevention components of the ESG Program, the provision of financial aid, and relocation and stabilization services, will be targeted to address the growing homeless family with children, youth, veterans and chronically homeless populations. This focus on the family homeless population supports the HUD national objective

of reducing the number of homeless families with children. Using the ESG funds for prevention and re-housing programs is essential to limit the potential growth of the homeless population.

SF-424

See Appendix 3

Summary of Consultation Process

Clark County is a member of the SNRPC Committee on Homelessness (CoH), whose primary responsibility is to manage the overall planning effort for the entire CoC, including, but not limited to:

- Setting agendas for full Continuum of Care meetings
- Project monitoring
- Determining project priorities
- Providing final approval for the CoC application submission

This body is also responsible for the implementation of the CoC's HMIS, either through direct oversight or through the designation of an HMIS implementing agency. This group may be the CoC Lead Agency or may authorize another entity to be the CoC Lead Agency under its direction.

Community Resources Management staff are also members of the Continuum of Care Evaluation Committee (CoCEC) which oversees the operations and activities of the CoC. It includes representatives from both public and private agencies, ensuring compliance with the regional 10-year strategic plan through:

1. Monitoring of performance measures and outcomes
2. Identifying potential gaps in services and housing; and
3. Reviewing/recommending potential CoC projects.

The CoCEC also participates in community events to raise awareness of homeless issues including Project Homeless Connect. Finally, the group is responsible for creating/amending local policies to bring them into line with changes brought about by the HEARTH Act.

The CoCEC staff provided information on the changes to the ESG program throughout the 2 years leading up to the final publication of the Interim Regulations for ESG. On February 21, 2012, CRM staff presented the specifics on the changes to the ESG program and provided draft Written Standards for ESG for review and comment from the CoCEC. The committee will also be providing assistance on the development of ESG Performance Standards which will be developed in collaboration with a HUD Technical Assistance organization, HomeBase in March and April 2012.

Summary of Citizen Participation Process

During the allocation process for the 2nd allocation of ESG funds for FY 2011, opportunities for public comment were numerous. All of the Community Development Advisory Committee (CDAC) meetings were public meetings and invited public comment both prior to the start of the meeting and at the end of the meeting, as required by Nevada Open Meeting Law. The CDAC

reviewed the applications for ESG funding for FY 2011 (2nd allocation) and FY 2012 in December, heard presentations from applicants in January and made funding recommendations in February 2012. Public comment was invited at these three meetings. No comments were received.

Citizens also had an opportunity to comment on the allocation recommendations and the Substantial Amendment to the FY 2011 Action Plan at the March 20th and April 17th, 2012 Board of County Commissioners meetings. The Substantial Amendment was available to the public beginning on April 6, 2012 for 30 days as noticed in 3 local newspapers, including a Spanish version, and posted on the Clark County CRM Website. A final public hearing was held at the SNRPC Committee on Homelessness meeting held on May 10, 2012. No comments were received from any of the meetings and no comments were received during the 30-day comment period. The CoH approved the submission of the Substantial Amendment.

Match Requirement

The recipients of the Emergency Solutions Grant awards are responsible for providing the required match. The match may be cash or an in-kind amount and cannot be counted as satisfying the matching requirement of another federal grant. The match funds will be used for ESG eligible activities. Based on the applications pending award under the Emergency Solutions Grant for homeless prevention and rapid re-housing of the homeless, the following match sources are committed:

Other Federal Funds	\$442,786
State grants	\$51,335
Local grants	\$86,000
Private Funds	\$52,000
Fundraising/Donations	\$216,523
In-kind match	\$108,358

Match documentation will be required before ESG reimbursement will be made.

Proposed Activities

Clark County does not intend to reprogram any portion of the initial (phase I) of the FY 2011 Emergency Shelter Grant award. Phase II Emergency *Solutions* Grant funds in the amount of \$157,908 are being allocated to Homelessness Prevention, Rapid Re-Housing and Administration of the ESG program.

Proposed Activities for Phase II ESG funding

Homelessness Prevention

- Emergency Aid of Boulder City \$14,191
- HELP of Southern Nevada \$20,541
- Lutheran Social Services \$55,817

Rapid Re-Housing

- Nevada Community Associates \$34,462

<i>ESG Administration</i>	<u>\$32,897</u>
Total	\$157,908

Discussion of Funding Priorities

The current emergency shelter system needs to be maintained to continue to provide for individuals falling into homelessness as a place for them to land so that they are not out on the streets. However, the continuum of care is working to provide more homeless prevention activities and develop a rapid re-housing system. The Office of Regional Initiatives and Community Resources Management Division staff are working with shelters and transitional housing providers to see if any of their programs can be reconfigured to provide permanent supportive housing or rapid re-housing sites. Both are also working to better coordinate with Rapid Re-housing providers to link to programs that reduce average times in shelter.

The Homeless Prevention and Rapid Re-housing (HPRP) Program used the majority of its funds for homeless prevention as opposed to rapid re-housing. While we originally thought the need was greater for rapid re-housing, the majority of the households served used prevention dollars. Those who were homeless generally required greater case management and services and had little to no income making it harder to find a landlord who was willing to rent to them when they know that without long term rental assistance, once our funds have been depleted, they may have to evict the household for non-payment. Therefore, Clark County will continue to focus much of its funding on homeless prevention while working to better develop the limited rapid re-housing system.

Detailed Budget

Please see the detailed budget of planned activities and funding levels for both Phase I and Phase II of the FY 2011 ESG funding in the Budget Table in the Appendix 1.

Written Standards for Provision of ESG Assistance

See Appendix 2

Process for Making Sub-awards

Clark County made the ESG application available to the public on October 26, 2011. The Notice of application availability was posted in Las Vegas Review Journal, posted on Clark County internet via ZoomGrants and an e-mail sent out to past 3 years ESG recipients and anyone who called and asked to be on the distribution list. The amount of funding available for Phase II was announced on November 15, 2011.

The ESG application was due on November 22, 2011 receiving 17 applications requesting \$1,052,407. On December 5, 2011, HUD revised the regulations for the Emergency Shelter Grants program by establishing the regulations for the Emergency Solutions Grants program, which replaces the Emergency Shelter Grant program.

CDAC had its orientation meeting on December 6, 2011 and the ESG Interim Regulations took effect on January 4, 2012. ESG applicants made presentations to the CDAC on January 17, 2012. The CDAC then ranked applications and arrived at funding recommendations on February 21, 2012. A public hearing on the ESG projects for FY 2011 Phase II was held at the March 20, 2012 Board of County Commissioners meeting. The projects were approved at that same meeting. Another public hearing was held on April 17, 2012 at the Board of County Commissioners meeting.

Homeless Participation Requirement

In order to ensure consultation with homeless or formerly homeless individuals, several member of the CoCEC are formerly homeless. The Office of Regional Initiatives is also working on a plan to consult currently homeless individuals as part of the Continuum of Care process, of which ESG is one funding source.

Performance Standards

The Southern Nevada Continuum of Care has begun the formulation of specific performance objectives and outcomes for all of its McKinney-Vento programs with the help of HomeBase, a HUD funded technical assistance provider. The first meeting to establish the CoC Performance Measure Workgroup was held on March 7, 2012. Over the next year, this group, which includes Clark County, will work with the wide variety of homeless services providers to establish performance standards for the Continuum of Care and the ESG program.

In the interim, as this amendment is focused on Rapid Re-Housing and Homeless Prevention activities, the performance measures outlined below will be used to assess the performance of our subrecipients. These are preliminary performance standards and will most likely change as the workgroup continues to develop the performance standards for the Continuum of Care.

Homeless Prevention performance measures:

1. Prevent an increase in the number of homeless households with children in the unincorporated county:
 - a. at least 50% of participants assisted will remain in permanent housing 6 months after the last assistance provided under the ESG program.

Homeless Rapid Re-Housing performance measures:

2. Reduce the number of homeless households in the unincorporated county:
 - a. at least 50% of participants assisted will remain in permanent housing 6 months after the last assistance provided under the ESG program.

Case Management Services performance measures:

3. Improve the self-sufficiency of homeless households in the unincorporated county:
 - a. 30% of program participants will see an increase in self-sufficiency scores by 20 percent using the Housing Needs Assessment Matrix.

Shelter Services performance measures:

4. Improve the outcomes for homeless people staying in shelter:
 - a. Reduce length of emergency shelter stays to 60 days
 - b. 40% of shelter stays of less than 31 days and exit into transitional or permanent housing
 - c. 50% of shelter participants exit into a transitional or permanent housing situation

Agencies receiving ESG funds will be monitored annually to ensure that program guidelines are being followed. A contract will be developed requiring quarterly reimbursement requests and timely expenditure of funds.

Certifications

See Appendix 3

Written Standards Required for Recipient Using Second Allocation of FY 2011 Funds for Emergency Shelter and Street Outreach

Not applicable

Requirements for Recipients Who Plan to Use the Risk Factor Under Paragraph (1)(iii)(G) of the “at risk of homelessness” Definition

Not applicable

Requirements for Optional Changes to the FY 2011 Annual Action Plan

Centralized or Coordinated Assessment System

There currently is no centralized or coordinated assessment system but the Office of the Regional Initiatives Coordinator is working with the service provider system and the Committee on Homelessness to devise such a system.

Monitoring

At this time, Clark County believes that its existing monitoring procedures are sufficient to monitor the ESG program under its new regulations. However, as we proceed under the new regulations, we will continue to evaluate our monitoring procedures to determine if they need to be modified.

APPENDIX 1: 2011 ESG BUDGET & HUD PROJECT TABLES 3C

FY 2011 Detailed Budget Table

First Allocation	\$280,725	FY 2011			
Second Allocation	\$157,908	Emergency Shelter Grants/Emergency Solutions Grant			
Grant Amount	\$438,633	Program Allocations			
Total Administration	\$32,897				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$254,925.00	\$0.00		\$254,925.00
	<i>Rehab/Conversion</i>				\$0.00
	<i>Operations</i>	\$180,886.00			\$180,886.00
	<i>Essential Services</i>	\$74,039.00			\$74,039.00
	Homelessness Prevention	\$25,800.00			\$25,800.00
	Administration				\$0.00
Emergency Shelter Grants Subtotal		\$280,725.00	\$0.00		\$280,725.00
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	\$34,462.00	\$34,462.00
	<i>Housing Relocation and Stabilization Services</i>			\$22,056.00	\$22,056.00
	<i>Tenant-Based Rental Assistance</i>				\$0.00
	<i>Project-Based Rental Assistance</i>			\$12,406.00	\$12,406.00
	Homelessness Prevention		\$0.00	\$90,549.00	\$90,549.00
	<i>Housing Relocation and Stabilization Services</i>			\$59,910.00	\$59,910.00
	<i>Tenant-Based Rental Assistance</i>			\$30,639.00	\$30,639.00
	<i>Project-Based Rental Assistance</i>				\$0.00
	Administration			\$32,897.00	\$32,897.00
Emergency Solutions Grants Subtotal			\$0.00	\$157,908.00	\$157,908.00
		Total Grant Amount:			\$438,633.00

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

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name Clark County, NV

Priority Need

Homelessness Prevention

Project Title

Emergency Aid of Boulder City Homeless Prevention and Utilities

Description

Funds will be used to provide rental and utility assistance to families facing homelessness in Boulder City.

Objective category: Suitable Living Environment Decent Housing Economic Opportunity
Outcome category: Availability/Accessibility Affordability Sustainability

Location/Target Area

Boulder City, NV

Street Address: 600 Nevada Way

City, State, Zipcode: Boulder City, NV 89006

Objective Number DH 2.3	Project ID 1
HUD Matrix Code 03T	CDBG Citation 570.201(c)
Type of Recipient Subrecipient	CDBG National Objective LMC
Start Date (mm/dd/yyyy) 07/01/2011	Completion Date (mm/dd/yyyy) 06/30/2013
Performance Indicator people	Annual Units 75
Local ID	Units Upon Completion

Funding Sources:

CDBG
ESG	\$14,191
HOME
HOPWA
Total Formula	\$14,191
Prior Year Funds
Assisted Housing
PHA
Other Funding	\$14,191
Total	\$28,382

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name Clark County, NV

Priority Need

Homelessness Prevention

Project Title

HELP of Southern Nevada Emergency Resource Services

Description

Funds will be used to provide rent and utility assistance to to prevent homelessness or provide deposit assistance for those households that are already homeless.

Objective category: Suitable Living Environment Decent Housing Economic Opportunity
Outcome category: Availability/Accessibility Affordability Sustainability

Location/Target Area

Clark County, NV

Street Address: 1640 E. Flamingo Road, #100

City, State, Zipcode: Las Vegas, NV 89119

Objective Number DH 2.3	Project ID 2
HUD Matrix Code 03T	CDBG Citation 570.201(c)
Type of Recipient Subrecipient	CDBG National Objective LMC
Start Date (mm/dd/yyyy) 07/01/2011	Completion Date (mm/dd/yyyy) 06/30/2013
Performance Indicator people	Annual Units 75
Local ID	Units Upon Completion

Funding Sources:

CDBG
ESG	\$20,541
HOME
HOPWA
Total Formula	\$20,541
Prior Year Funds
Assisted Housing
PHA
Other Funding	\$20,541
Total	\$41,082

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name Clark County, NV

Priority Need

Homelessness Prevention

Project Title

Lutheran Social Services Homeless Prevention

Description

Funds will be used to pay rent, late fees, and associated eligible costs that do not exceed the equivalent of three months' base rent. If the household has already fallen into homelessness, LSSN will assist with the first month's rent, security deposit, turning utilities on and perhaps part of the second and third month's rent, to ensure housing stability.

Objective category: Suitable Living Environment Decent Housing Economic Opportunity
Outcome category: Availability/Accessibility Affordability Sustainability

Location/Target Area

Clark County, NV

Street Address: 79 Spectrum Blvd

City, State, Zipcode: Las Vegas, NV 89101

Objective Number DH 2.3	Project ID 3
HUD Matrix Code 03T	CDBG Citation 570.201(c)
Type of Recipient Subrecipient	CDBG National Objective LMC
Start Date (mm/dd/yyyy) 07/01/2011	Completion Date (mm/dd/yyyy) 06/30/2013
Performance Indicator people	Annual Units 45
Local ID	Units Upon Completion

Funding Sources:

CDBG
ESG	\$55,817
HOME
HOPWA
Total Formula	\$55,817
Prior Year Funds
Assisted Housing
PHA
Other Funding	\$55,817
Total	\$107,634

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

Table 3C
Consolidated Plan Listing of Projects

Jurisdiction's Name Clark County, NV

Priority Need

Homelessness Prevention

Project Title

Nevada Community Associates Project E.I.G.H.T.

Description

Funds will be used to rapidly re-house homeless households with children. NCA has an agreement with a large multifamily housing operator in the Las Vegas Valley with rental complexes throughout the area from which families can choose. NCA will also provide the wrap around case management services needed to help these households become self-sufficient.

Objective category: Suitable Living Environment Decent Housing Economic Opportunity
Outcome category: Availability/Accessibility Affordability Sustainability

Location/Target Area

Clark County, NV

Street Address: Community wide

City, State, Zipcode:

Objective Number DH 2.3	Project ID 4
HUD Matrix Code 03T	CDBG Citation 570.201(c)
Type of Recipient Subrecipient	CDBG National Objective LMC
Start Date (mm/dd/yyyy) 07/01/2011	Completion Date (mm/dd/yyyy) 06/30/2013
Performance Indicator people	Annual Units 10
Local ID	Units Upon Completion

Funding Sources:

CDBG
ESG \$34,462
HOME
HOPWA
Total Formula **\$34,462**
Prior Year Funds
Assisted Housing
PHA
Other Funding \$34,462
Total **\$68,924**

The primary purpose of the project is to help: the Homeless Persons with HIV/AIDS Persons with Disabilities Public Housing Needs

**Table 3C
Consolidated Plan Listing of Projects**

Jurisdiction's Name Clark County, NV

Priority Need

Administration

Project Title

Clark County ESG Administration

Description

Funds will be used to administer ESG activities in Clark County.

Objective category: Suitable Living Environment Decent Housing Economic Opportunity
Outcome category: Availability/Accessibility Affordability Sustainability

Location/Target Area

N/A

Street Address: 500 S. Grand Central Parkway

City, State, Zipcode: Las Vegas, NV 89155

Objective Number N/A	Project ID 16
HUD Matrix Code 21A	CDBG Citation 570.206
Type of Recipient Local Government	CDBG National Objective N/A
Start Date (mm/dd/yyyy) 07/01/2011	Completion Date (mm/dd/yyyy) 06/30/2013
Performance Indicator N/A	Annual Units N/A
Local ID	Units Upon Completion

Funding Sources:

CDBG
ESG	\$32,897
HOME
HOPWA
Total Formula	\$32,897
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total	\$32,897

APPENDIX 2: WRITTEN STANDARDS

**CLARK COUNTY EMERGENCY SOLUTIONS GRANT PROGRAM
WRITTEN STANDARDS**

i. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG)

Individuals and families eligible for emergency shelter housing funded by ESG funds must be homeless as defined by the General Definition of Homeless Individual, found in the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH Act) Section 103. [42 USC 11302]

Clients assisted with ESG funds need to be entered into HMIS during client intake, agency must maintain a minimum HMIS data quality of 90%. An exception to this is any agency specifically providing emergency shelter to victims of domestic violence, stalking, sexual abuse and trafficking. In this case, a comparable database should be used that protects the identity and safety of clients.

In addition to use of HMIS during client intake, case managers/ intake workers must also complete the Homeless Prevention Assistance Consortium Housing Needs Assessment matrix when conducting client intake. Intake matrix should be printed on the non-profit agency's letterhead/ or include agency's name and be kept in client file unless uploaded into HMIS and identified as agency's document.

ii. Standards for targeting and providing essential services related to street outreach

Clark County is not using this funding for Street Outreach activities.

iii. Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;

All **homeless individuals/families** seeking shelter must be provided shelter. If there are no appropriate or available beds for the client at the location he/she is seeking assistance, then the agency must place client into another appropriate shelter. There is no county imposed limit on the length of stay. It is the discretion of the agency and program providing shelter services to set limits, if any, on the length of stay depending on the target population, client's barriers to obtain permanent housing, and other circumstances the client is facing.

Per HUD, sheltered families with children cannot be broken apart. If no shelter is available on-site, an alternative living arrangement must place the family together which may include placement at another shelter that houses families, or hotel-motel rooms (in areas where no other appropriate shelter is available).

Providers should aim to have clients leave the program into a permanent and stable housing situation. This can be placement into supportive housing, or client may become self-sufficient and able to maintain his/her own housing with a stable source in income.

If client leaves the program and is not stably housed, all efforts should be made to place client into another more appropriate shelter/ housing situation.

Vulnerable populations seeking shelter need access to appropriate shelter that is safe, sanitary, and habitable. This population includes victims of domestic violence, youth, people with special needs, the elderly, medically frail, mentally ill, and victims of human trafficking. Upon intake and if necessary, client may be referred and sheltered in a more appropriate location elsewhere. Currently there are a few providers that offer emergency shelter beds and supportive services to these vulnerable populations. There is no time limit on their length of stay. Clients are not discharged back out to the street or into unsafe living conditions, but if necessary are referred to another appropriate housing program.

In addition to homeless clients seeking shelter, street outreach is conducted by local homeless providers including the Las Vegas Metropolitan Police Department to get homeless people located in places not meant for human habitation into emergency shelter or transitional/ permanent housing.

iv. Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;

Clients assisted with ESG funds are to be entered into HMIS during client intake and agency must maintain a minimum HMIS data quality of 90%. An exception to this is any agency specifically providing emergency shelter to DV, victims of stalking, sexual abuse and trafficking. In this case a comparable database should be used that protects the identity and safety of clients.

In addition to use of HMIS during client intake, case managers/ intake workers must also complete the (Homeless Prevention Assistance Consortium) Housing Needs Assessment matrix when conducting client intake. Intake matrix should be printed on the non-profit agency's letterhead/ or include agency's name and be kept in client file unless uploaded into HMIS and identified as agency's document.

Intake staff will conduct a housing needs assessment interview for each individual/ family seeking emergency shelter. The housing needs assessment matrix is included in that interview. Clients are assigned between 10 and 50 points. Ten points is the most stable and in need of the least amount of assistance. Fifty points is the least stable, where the client faces significant barriers to obtain stable housing and which would determine that the client needs a high level of supportive services and connections to other programs in order to regain stability. During intake, shelter staff also looks at other factors and barriers to permanent housing to determine the appropriate services, program, etc. for clients. Per the ESG Interim rule, program participants must meet at least monthly with a case manager who must develop an individualized permanent housing plan for each participant/household.

In addition to shelter, **clients must be assisted to** the maximum extent possible with connections to other programs targeted to homeless people in the local Continuum of Care area, as well as mainstream housing, health, social services, employment, education and youth programs for which they may be eligible. (See 576.4 Area-wide systems coordination, sections b and c for a full list). This includes CoC, HUD-VASH, Education for homeless Children and Youth, Health Care for Homeless, Runaway and Homeless Youth, Homeless Veterans Reintegration, Section 8, Public Housing, HOME Investment Partnership, Workforce Investment Act, and TANF programs. When assisting vulnerable populations, services need to be tailored to address their special needs.

To improve awareness of services, ESG funded agencies are required to attend training and meeting sessions on homeless services in the community. This includes the Mainstream Programs Basic Training, the SNRPC Committee on Homelessness meetings, and SOAR training.

v. Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see §

576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);

To improve collaboration and awareness of services, ESG funded agencies are required to attend training and meeting sessions on homeless services in the community.

Case management and intake staff are required to attend **Mainstream Programs Basic Training classes** which provide information on the local and federal resources and programs covering the following core topics include: Income Supports, Employment Services, Health Care, Legal Services, and Housing Resources. Topics in FY11 included: Veterans, Housing Resources, Employment Services/Income Supports, Addictions & Mental Health, Homeless Youth/Young Adults and Families w/ Children, Human Trafficking, Senior Services/ HealthCare Services, Legal Services/ Financial Literacy, Domestic Violence, HIV/AIDS, and Services for Persons with Disabilities.

ESG subrecipients on the director or management level must attend a minimum of 5 Southern Nevada Regional Planning Commission- **Committee on Homelessness** (SNRPC CoH) meetings per year.

One staff member from each ESG funded program providing direct supportive services to is highly encouraged to complete SSI/SSDI, Outreach, Access, and Recovery (**SOAR**) **training** within 18 months of the date their assistance agreement for ESG funds is fully executed. Outcomes need to be reported to the Office of the Regional Homeless Coordinator **at least** once per year. (SOAR) training is available for direct service workers who once trained, understand Disability Determination Services and Social Security Administration's requirements and need for appropriate documentation, which decreases the time to issue determinations and reduce the need for appeals. It is a national project funded by Substance Abuse and Mental Health Services Administration (SAMHSA). SOAR training helps case managers speed up the time between application of benefits and receipt of benefits for clients eligible for assistance. This would highly benefit eligible adults who are homeless or at risk of homelessness and have a mental illness and/or co-occurring substance abuse disorder. This is a population that faces high barriers to seeking stable affordable permanent housing.

vi. 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;

Intake and HMIS: Subrecipients will be required to use HMIS during client intake and also complete the Housing Needs Assessment matrix when conducting client intake for homeless prevention or rapid re-housing assistance. Clients seeking homeless prevention or rapid re-housing assistance will also need to complete the Homeless Prevention Consortium Supplemental Application for Rent and/or Utility Assistance. Criteria must be supported by documentation that has been copied and uploaded into the electronic file in HMIS and stored in the client's paper file.

Homeless Prevention: Eligible participants are individuals/families with incomes below 30% Area Median Income, at risk of becoming homeless and moving into an emergency shelter or a place not meant for human habitation. All assisted individuals/families must meet eligibility criteria as outlined at 576.103 Homeless Prevention Component in Interim Rule. Participants are eligible if they meet the HUD definition of "at risk of homelessness", or who meet the criteria in paragraph 2, 3, or 4 of the homeless definition **AND** have an annual income below 30% of area median family income. Those who meet the HUD criteria of eligibility and who score over 30 points on the Housing Needs Assessment matrix will receive priority for assistance over other eligible persons.

Rapid Re-housing: Eligible participants need to be literally homeless. To be eligible beneficiaries must meet the definition of homelessness under paragraph 1 of the “homeless definition” defined by the ESG interim rule, or meet criteria under paragraph 4 of homeless definition *AND* live in an emergency shelter or other place described in paragraph 1 of homeless definition. Clients eligible under the HUD definition of literally homeless and who score over 40 points on the Housing Needs Assessment matrix will receive priority over other eligible persons.

- vii. **Standards for determining *what percentage or amount* of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;**
- viii. **Standards for determining *how long* a particular program participant will be provided with rental assistance and *whether and how the amount of that assistance will be adjusted over time*;**
- ix. **Standards for determining the *type, amount, and duration* of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.**

Rental Assistance to Prevent Eviction: All clients will complete the Homeless Prevention Consortium Housing Needs Assessment Matrix and the Supplemental Application for Rent and/or Utility Assistance. Clients eligible under the HUD definition of at risk of homelessness and who score over 30 points on the matrix will receive priority over other eligible persons who are at risk of homelessness. HUD requires clients receiving assistance for homeless prevention to be re-evaluated at least once every three months.

Furthermore, the following local conditions apply:

Homeless Prevention:

For Short-term rent (1-3 months of assistance allowed at 100% rate of rent)

1. The household will actively engage in a Housing Stabilization Plan, the goal of which will be to either increase income and/or reduce expenses such that the rental cost is no more than 80% of the household’s net income;
2. The client household will enter into a Client Contract, agreeing to participate in case management and other activities designed to improve their ability to remain stably housed.
3. The initial assistance must have been necessary to avoid eviction (eviction notice required), or to avoid or reduce an unnecessary episode of homelessness of the household;
4. Rental assistance may not be provided to a program participant receiving rental assistance from other public sources (except for 6 months arrears);
5. Rental rates must not exceed the Fair Market Rent specified for household size and rental rates must comply with HUD’s rent reasonableness.
6. Any housing units constructed before January 1, 1978 will be assessed for lead based paint hazards;
7. Each household receiving rental assistance must have a legally binding, written lease (between the owner and participant household) for the rental unit in their name, unless the assistance is solely for rental arrears.
8. Arrears (no more than 6 months) must be paid off first to bring the balance to zero if possible. Payment of rental arrears can only be a one-time payment up to 6 months including any late fees on those arrears.

9. Unit owners must be paid on a timely basis in accordance with the rental assistance agreement. Any late payment penalties that are incurred must be paid by subrecipient or household (with non-ESG funds).
10. The household will be “recertified” for eligibility no later than the 20th day at the end of the 3rd month.
11. A second and third issuance of rental assistance can be considered when the household demonstrates compliance with and progress on the Housing Stability Plan.
12. If the third month recertification and assessment finds that the client needs additional assistance, and if the household demonstrates compliance with and progress on the Housing Stability Plan, client may proceed to receive medium term rent assistance (4-13 months of assistance) and must continue to be re-assessed every month.

For medium term rent (4-13 months of assistance) Up to 100% of the fourth month of rent may be paid. Months 5-13 may be paid at a rate of 75% of rent.

1. Priority will be given to households who score 30 points or more on the Housing Needs Assessment Matrix and who may need more than 3 months to stabilize;
2. The household will continue to actively engage in a Housing Stabilization Plan, the goal of which will be to either increase income and/or reduce expenses such that the rental cost is no more than 80% of the household’s net income;
3. The household will be “recertified” for eligibility monthly, not later than the 20th day of each month (late fees for subsequent months will not be paid with ESG funds);
4. Each additional 4th-12th month of rental assistance can be considered when the household demonstrates compliance with and progress on the Housing Stability Plan.

For short term & medium term rent and housing relocation & stabilization services:

1. If necessary to relocate to another affordable housing unit, security deposits may be paid but must equal no more than 2 months rent.
2. If necessary to obtain housing for household, last month’s rent (of prior housing unit) may be paid. Assistance must not exceed one month’s rent.
3. Arrears up to 6 months allowed by HUD including any late fees, must be one-time payment

Any combination of rental assistance including short term and medium term rental assistance, and payment of rental arrears, security deposits, last month’s rent, may not exceed 13 months during any 3-year period. However, arrears, last month’s rent, and security deposits are limited to onetime assistance per year.

The maximum times a participant can receive non-consecutive rental assistance is 3 times per 13 month period.

Assistance with Essential Utilities (eligible under housing relocation & stabilization services)

All clients will complete the Homeless Prevention Consortium Housing Needs Assessment Matrix and the Supplemental Application for Rent and/or Utility Assistance (1-13 months of assistance allowed)

The maximum times a participant can receive non-consecutive utility assistance is 3 times per 13 month period. However, utility arrear payments are limited to 1 time assistance per year.

Eligible utility services are gas, electric, water, and sewage.

4. Priority will be given to households that score over 30 points on the Housing Needs Assessment Matrix;
5. The utility is for a service at a housing unit leased or otherwise contracted to the assisted household.
6. Household is also to receive assistance with rent to avoid homelessness.
7. Utility service must be in client's name and at the address they are living at and obtaining rental assistance.
8. Up to 13 months of utility payments per participant, per service, including up to 6 months of arrearages, per service is allowed (must pay arrear as onetime payment).
9. The utilities are in arrears (there is a past due amount). This is limited to one time per year.
10. Households with a shut off notice of utilities shall be assisted to bring the past due amount to a zero balance, provided utilities are no more than six (6) months in arrears and shall be considered for rental assistance in that or the following month. If the household has an Eviction Notice, they can be assisted with rent arrears and utilities arrears.
11. The client file must contain evidence that the household has applied for assistance from one or more of the Energy Assistance Programs administered through the Division of Welfare and Supportive Services of the State of Nevada or through the United Way of Southern Nevada;

Rapid Re-housing

All clients will complete the Housing Needs Assessment Matrix and the Supplemental Application for Rent and/or Utility Assistance. Clients eligible under the HUD definition of literally homeless and who score over 40 points on the matrix will receive priority over other eligible persons. HUD requires clients receiving assistance for rapid re-housing to be re-evaluated at least once per year, however, on a local basis, additional assessments are required (see below).

Rental Assistance

Generally, restrictions are similar to the rent and utility restrictions under Homeless Prevention, except that the maximum number of months client can be assisted is 15 months with rapid re-housing.

For Short-term rent (1-3 months of assistance allowed at 100% rate of rent)

1. The household should score over 30 points on the Housing Needs Assessment Matrix. Highest priority will be given to clients scoring over 40 points;
2. The household will actively engage in a intensive case management plan, the goal of which will be to either increase income and/or reduce expenses such that the rental cost is no more than 80% of the household's net income;
3. The household will be "recertified" for eligibility at the end of the third month, not later than the 20th day of each month, and then after the 3rd month, on a monthly basis.
4. Rental assistance may not be provide to a program participant receiving rental assistance from other public sources
5. Rental application fees are eligible for ESG reimbursement (under housing relocation & stabilization services).
6. Security deposits may be paid but must equal no more than 2 months rent (eligible under housing relocation & stabilization services).
7. If necessary to obtain housing for household, last month's rent (of prior housing unit) may be paid. Assistance must not exceed one month's rent (eligible under housing relocation & stabilization services).
8. Each household receiving rental assistance must have a legally binding, written lease (between the owner and participant household) for the rental unit in their name.

9. The housing unit where the household will reside must be affordable to the household. Rental rates must not exceed the Fair Market Rent specified for household size and rental rates must comply with HUD's rent reasonableness.
10. Any housing units constructed before January 1, 1978 will be assessed for lead-based paint hazards;
11. The first issuance of assistance can be up to 100% of the upcoming month rent.
12. A second and third issuance of rental assistance can be considered when the household demonstrates compliance with and progress on intensive case management plan.
13. If necessary, client receiving short term assistance, and who receive 30 points or more on the Housing Needs Assessment Matrix upon reassessment may proceed to receive medium-term rent assistance (4-24 months of assistance) and continue to be reassessed every month.

For medium term rent (4-15 months of assistance): Month 4 can be paid at up to 100%, thereafter months 5-15 can be paid at 75%.

1. Priority will be given to households who score a minimum of 25 points on the Housing Needs Assessment Matrix and who need more than 3 months to acquire long term housing;
2. The household will actively engage in an intensive case management plan, the goal of which will be to either increase income and/or reduce expenses such that the rental cost is no more than 80% of the household's net income;
3. The household will be "recertified" for eligibility monthly, not later than the 20th day of each month (late fees for subsequent months will not be paid with ESG funds);

For short term & medium term rent and housing relocation & stabilization services:

1. If necessary to obtain an affordable housing unit, security deposits may be paid but must equal no more than 2 months rent.
2. If necessary to obtain housing for household, last month's rent (of prior housing unit) may be paid. Assistance must not exceed one month's rent.
3. Arrears up to 6 months allowed by HUD including any late fees, must be one-time payment.

Any combination of rental assistance including short term and medium term rental assistance, the payment of rental arrears, security deposits, last month's rent, may not exceed 15 months during any 3-year period.

The maximum amount of times a participant may receive non-consecutive rental assistance is 3 times per 15 month period. However arrearages, last month's rent, and security deposits are limited to a onetime assistance per year.

Assistance with Essential Utilities (eligible under housing relocation and stabilization services)

All clients will complete the Housing Needs Assessment Matrix and the Supplemental Application for Rent and/or Utility Assistance. Clients eligible the HUD definition of literally homeless and who score over 40 points on the matrix will receive priority over other eligible persons.

Generally, restrictions are similar to the rent and utility restrictions under Homeless Prevention except that the maximum number of months client can be assisted is 15 months with rapid re-housing.

1. Priority to households who score over 40 points on the Housing Needs Assessment Matrix;
2. Up to 15 months of utility payments per participant, per service, including up to 6 months of arrearages, per service is allowed (must pay arrear as a onetime payment). Eligible utility

services are gas, electric, water, and sewage. Household is also to receive assistance with rent in order to stabilize.

3. The assisted households 'existing arrears (of only up to 6 months) will need to be paid off first to bring their past due balance to zero. After the payment of any arrearages, client may receive utility assistance for new utility charges.
4. Utility deposits to pay a standard utility deposit required by utility company are an eligible ESG expense (under housing relocation & stabilization services).
4. The utility is for a service must be at a housing unit leased or otherwise contracted to the assisted household.
5. The client file must contain evidence that the household has applied for assistance from one or more of the Energy Assistance Programs administered through the Division of Welfare and Supportive Services of the State of Nevada or through the United Way of Southern Nevada;

The maximum times a participant can receive non-consecutive utility assistance is 3 times per 15 month period.

Other Financial Assistance Standards

Moving Costs (for homeless prevention/rapid re-housing): Eligible costs are for moving costs, such as truck rental or hiring a moving company. ESG assistance may include payment of temporary storage fees for up to 3 months as long as fees are accrued after the program participant begins receiving ESG assistance.

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

All clients will complete the Housing Needs Assessment Matrix. Clients eligible the HUD definition of at risk of homelessness and who score over 30 points on the matrix will receive priority for homeless prevention assistance over other eligible persons who are at risk of homelessness. Clients eligible under the HUD definition of literally homeless and who score over 40 points on the matrix will receive priority for rapid re-housing assistance over other eligible persons.

Those scoring higher points are in a higher need of the most extensive type of assistance. The type of housing relocation/ stabilization services provided to program participant will depend on his/her need as assessed by case manager.

Limits on housing stabilization and relocation services:

Financial assistance policies and procedures addressed above in detail.

There will be no maximum *amount of assistance* established per client.

The maximum *amount of time* a client may be assisted within a 3 year period:

13 months for Homeless Prevention assistance

15 months for Rapid-Rehousing assistance

The maximum times a participant may receive utility payment assistance is 3 times per 13 or 15 month period (depending on if assistance is for homeless prevention or rapid re-housing).

Utility arrear payments are limited to 1 time per year.

Service costs include: housing search and placement, housing stability case management, mediation, legal services, and credit repair. Except for housing stability case management there will be a limit of 13 months per 3 year period on service costs assistance for program participants receiving homeless prevention assistance, and 15 months per 3 year period months for program participants receiving rapid re-housing assistance.

APPENDIX 3: SF-424 & CERTIFICATIONS

**APPLICATION FOR
FEDERAL ASSISTANCE**

OMB Approved No. 3076-0006

Version 7/03

1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction	<input type="checkbox"/> Pre-application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction	2. DATE SUBMITTED 5/15/12	Applicant Identifier
		3. DATE RECEIVED BY STATE	State Application Identifier
		4. DATE RECEIVED BY FEDERAL AGENCY 5/15/12	Federal Identifier

5. APPLICANT INFORMATION

Legal Name: Clark County, Nevada	Organizational Unit: Department: Administrative Services
Organizational DUNS: 083782953	Division: Community Resources Management
Address: Street: 500 S. Grand Central Parkway, 5th Floor	Name and telephone number of person to be contacted on matters involving this application (give area code) Prefix: First Name: Kristin
City: Las Vegas	Middle Name Rowena
County: Clark County	Last Name Cooper
State: NV	Zip Code 89135
Country: USA	Email: krc@clarkcountynv.gov

6. EMPLOYER IDENTIFICATION NUMBER (EIN): [8][8]-[6][0][0][0][2][8]	Phone Number (give area code) 702-455-5025	Fax Number (give area code) 702-455-5038
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8. TYPE OF APPLICATION: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.)	7. TYPE OF APPLICANT: (See back of form for Application Types) B-County Other (specify)
Other (specify)	9. NAME OF FEDERAL AGENCY: US Department of Housing and Urban Development

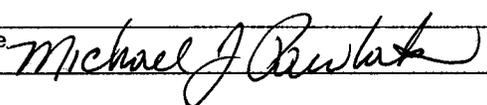
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: TITLE (Name of Program): Emergency Solutions Grant [1][4]-[2][3][1]	11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Emergency Solutions Grant for homeless households and households threatened with homelessness.
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12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): Clark County, NV
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13. PROPOSED PROJECT Start Date: 7/1/11	Ending Date: 6/30/13	14. CONGRESSIONAL DISTRICTS OF: a. Applicant 1st and 2nd	b. Project 1st and 2nd
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15. ESTIMATED FUNDING:	16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?
a. Federal \$ 157,908. ⁰⁰	a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE:
b. Applicant \$. ⁰⁰	b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372
c. State \$. ⁰⁰	<input checked="" type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
d. Local \$. ⁰⁰	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?
e. Other \$. ⁰⁰	<input type="checkbox"/> Yes if "Yes" attach an explanation. <input checked="" type="checkbox"/> No
f. Program Income \$. ⁰⁰	
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. Authorized Representative		
Prefix	First Name Michael	Middle Name J.
Last Name Pawlak	Suffix	
b. Title Manager	c. Telephone Number (give area code) 702-455-5025	
d. Signature of Authorized Representative 	e. Date Signed 6.11.12	

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.

Michael J. Butch

Signature/Authorized Official

5/11/12

Date

Manager, CRM

Title