

CITY OF WORCESTER, MA



CONSOLIDATED SUBMISSION FOR COMMUNITY PLANNING AND DEVELOPMENT (2015 – 2020)

FIFTH YEAR ACTION PLAN (JULY 1st, 2019 – JUNE 30th, 2020)



*Prepared by:
City Manager's Executive Office of Economic Development*

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Executive Summary

AP-05 Executive Summary - 24 CFR 91.200(c), 91.220(b)

1. Introduction

The U.S. Department of Housing and Urban Development (HUD) requires that entitlement cities prepare a Consolidated Plan (ConPlan) to receive federal housing and community development funding. The City of Worcester, MA Five-Year Consolidated Submission for Community Planning and Development (7/1/15 - 6/30/20) combines into one document the requirements of four federal programs administered by HUD - the Community Development Block Grant (CDBG), the Home Investment Partnerships Program (HOME), the Housing Opportunities for Persons With AIDS (HOPWA), and the Emergency Solutions Grant (ESG). The Consolidated Plan allows the City of Worcester to shape its housing and community development programs into coordinated strategies and helps inform progress toward community development. The City of Worcester must submit a full Consolidated Plan every five years; yearly action plans are required as presented herein in this City of Worcester, MA Fifth Year Action Plan (7/1/19 - 6/30/20).

While the City continues to make progress addressing community needs, it continues to face numerous existing and emerging needs and challenges. Updated analysis and research indicates the need for continued investment and effort around addressing affordable housing production and barriers to accessing affordable housing, trends related to aging housing stock, and widespread housing deferred maintenance. Particularly, supportive housing providers report a shortage of single room occupancy units that are below Fair Market Rent (FMR) and thus accessible to individuals below 30% AMI transitioning from shelter or transitional housing to permanent housing through ESG Rapid Rehousing or a Continuum of Care (CoC)-supported project. Consultation with citizens and service providers stressed a continued need for social and human services and housing supportive services for low- to moderate-income and special needs populations including youth, recent immigrants, resettled refugees, the elderly and homeless, individuals with substance abuse and mental health challenges, and those living with HIV/AIDS.

In anticipation of declining federal entitlement grant allocations and uncertainty of federal fiscal resources moving forward, continued strategic leveraging of private investments and community-based resources are needed. As needs and issues often overlap and concentrate in neighborhoods, there is a need for more strategic, concentrated, neighborhood-based collaborations with private and community resources and cross-departmental collaborations. This is the model that the City has been implementing with an emphasis on place-based, neighborhood focused revitalization strategies as is being carried out during the last few years in the Union Hill neighborhood and will be implemented in the Green Island neighborhood. A focused, block by block approach to addressing infrastructure, housing and community development needs is being implemented in these areas and proposed for other communities as part of this and any future plans that use federal entitlement grant funds.

2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

The Five-Year Consolidated Plan (2015-20) Goals are as follows:

1. Affordable Housing Development & Preservation
2. Healthy and Sustainable Housing
3. Neighborhood Stabilization & Revitalization
4. Economic Development & Business Assistance
5. Public Services for Low-Moderate Income Persons
6. Improvement and Preservation of Public Facilities
7. Expand Resources for Homelessness Preservation
8. Resolve Barriers to Housing for Homeless Persons
9. Housing Opportunities for Persons with HIV/AIDS

3. Evaluation of past performance

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

The targeting of HUD formula grant funds continues to be maximized towards serving low- and moderate-income persons. It is projected that 94.6% of CDBG funds expended during the fourth year action plan since 7/1/2018 will be expended on activities that meet the national community development objective to be of benefit to low- and moderate- income (LMI) persons. Through the first four action plan years (since 7/1/2015), it is projected that 92.6% of CDBG funds will be expended on LMI benefit activities. When expenditures under HOME, HOPWA, and ESG are added it is projected that 94.7% of all HUD Formula Funds (CDBG, HOME, HOPWA, and ESG) expended during the first four action plan years will be for activities that benefit persons of low- and moderate-income.

A total of 329 affordable housing units were impacted through down payment assistance, new construction, and rehabilitation under HOME and CDBG funded housing programs during the last four years.

Efforts to affirmatively further fair housing were noteworthy given that minority households were the beneficiaries in 68% of rental and 50% of owner units that completed construction or rehabilitation during the last four years. Similarly 64% of homebuyers assisted through CDBG during the same period were minority households.

A total of 16 CDBG funded public service programs worth \$644,248 were contracted during 2018-2019 to provide services to 5,272 low- and moderate-income persons to address identified needs for health services, case management, youth programming, food and housing security, employment and job assistance, after school programming, recreational activities, financial assistance, elder transportation and community gardens. Through the first four action plan years (since 7/1/15), 19,155 LMI persons have benefited from 50 public services programs which were contracted with \$2,451,327 in CDBG funds (which in turn leveraged \$6,015,579 in other public and private resources).

CDBG funds help City of Worcester provide much needed public facility improvements. Over the past four years \$12.6 million in CDBG funds were utilized on public facilities ranging from 9 streets reconstructed, 2 major park improvements, 5 firefighting trucks and 27 sets of firefighting equipment purchased, 3 major senior center improvements, 2 public school renovations, and 21 non-profit service delivery facility improvements ranging from energy efficiency improvements to safety and structural improvements, as well as 4 fire stations rehabilitated, and the rehabilitation of 1 major historical structure.

CDBG funds help to incentivize business creation, expansion, and enhancement through loans, grants, and technical assistance. In the past four years, the City has expended \$720,000 in CDBG to assist 28 businesses/properties that have generated 56 jobs for low- and moderate-income persons. This CDBG funded business assistance activity has generated \$1.2 million in other investments.

During 2018-2019, the city funded 5 programs through 4 HOPWA Eligible Metropolitan Statistical Area non-profits (3 in Worcester County and 1 in Windham County, CT), providing services and housing that will help over 125 individuals and families obtain and maintain stable housing.

During 2018-2019, the city funded 8 programs through 8 entities through the Emergency Solutions Grant (ESG) that will provide services, shelter, and sustenance to over 400 persons (both individuals or those within families), including veterans, youth, formerly incarcerated, those fleeing domestic violence, unsheltered homeless, and those exiting the Triage & Assessment Center for permanent housing.

4. Summary of Citizen Participation Process and consultation process

Summary from citizen participation section of plan.

Beginning in 2014, the city of Worcester embarked on the development and implementation of a new Five (5) Year Consolidated Plan (2015-2020). In order to establish an updated baseline of community needs for the Consolidated Plan, the city sponsored an extensive public outreach effort in 2014 and 2015, holding a series of eight (8) community needs assessment meetings in various neighborhoods throughout the city, with at least one in each of the city council districts. The meetings were attended by over 110 total participants. This neighborhood outreach was complimented by various individual and group consultations with numerous housing, human, and social service providers in the areas of homelessness, public housing, and services for special needs and low-income populations.

The Five (5) Year Consolidated Plan and the subsequent annual action plans helped to inform the proposed fifth year (2019-2020) annual action plan outreach/funding recommendation process. In addition, after the announcement of the availability of Request for Proposals (RFP) for fifth year action plan funding through CDBG, HOPWA, and ESG, a Community Needs Public Hearing was held on January 17, 2019 at City Hall to review and assess updated needs information received through workshops and any additional community input.

The Community Development Advisory Committee (CDAC), has traditionally served as the formal citizen body that provides input on funding applications submitted as part of the city's CDBG RFP process. The CDAC is a citizen advisory committee comprised of ten members, with two from each of Worcester's five council districts. This year, the CDAC met seven times from October 2018 through March 2019 to review and evaluate the CDBG proposals and listen to presentations and ask questions of all of the Public Services, Public Facilities and Improvements, and City Interdepartmental applicants that submitted proposals in response to the RFP.

While the CDAC issues initial advisory recommendations on funding allocations, it is the city administration, through the city manager, that ultimately recommends which CDBG projects and activities to fund which form the basis of the annual action plan.

HOPWA proposals were vetted by the city administration together with the HOPWA Advisory Committee. This committee is composed of experts in community health and the HIV/AIDS field in Worcester County and Connecticut. The process was similar to CDAC in its review, including holding a public meeting to introduce the HOPWA process and guidelines, a technical assistance meeting for interested applicants, and a review and ranking session held in public at City Hall.

ESG proposals were vetted by an ESG RFP Review Committee that was comprised of members of the Worcester City and County Continuum of Care (CoC), and local funders of such social services such as the United Way. The ESG RFP Review Committee also followed a similar process to the CDAC in its review, including holding a public meeting to introduce the ESG process and guidelines, a technical assistance meeting for interested applicants, and an RFP review and ranking session at City Hall.

5. Summary of public comments

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

In conformity HUD directives, the City of Worcester Draft Fifth Year Action Plan (7/1/19 – 6/30/20) is being made available for a 30-day public review and comment period from May 29, 2019 to June 28, 2019. A hardcopy of said Draft Fifth Year Annual Action Plan will be available at the City of Worcester, Executive Office of Economic Development (EOED), City Hall, 455 Main Street, 4th Floor, Room 404, Worcester, MA 01608 (open 8:30 AM - 5 PM, normal working days). An electronic copy will also be available at: <http://www.worcesterma.gov/e-services/document-center/neighborhood-development>. Persons wishing to submit comments regarding the City of Worcester Fifth Year Action Plan funding recommendations can submit them in writing by 5 P.M., June 28, 2019 to the City of Worcester, Executive Office of Economic Development, City Hall, 455 Main Street, 4th Floor, Room 404, Worcester, MA 01608 or by email to development@worcesterma.gov.

A public hearing was also scheduled to be held from 5:30 P.M., Wednesday, June 12, 2019, 2019 in City Hall Room 401, 455 Main Street, Worcester MA to discuss the Draft Annual Action Plan and respond to interested parties.

6. Summary of comments or views not accepted and the reasons for not accepting them

See section 5 above, the public review and comment period for this draft is currently open.

7. Summary

The City of Worcester continues to promote a robust citizen participation process to help establish and update baseline community needs and inform the Annual Action Plan update development process.

While the City of Worcester has made substantial progress in addressing community development over the last five years, it continues to face numerous existing and emerging needs and challenges. Activities to be funded through this Fifth Year Action Plan (7/1/19 – 6/30/20) will address the below goals that have been established for the City of Worcester 5-Year Consolidated Plan:

1. Affordable Housing Development & Preservation
2. Healthy and Sustainable Housing
3. Neighborhood Stabilization & Revitalization
4. Economic Development & Business Assistance
5. Public Services for Low-Moderate Income Persons
6. Improvement and Preservation of Public Facilities
7. Expand Resources for Homelessness Preservation
8. Resolve Barriers to Housing for Homeless Persons
9. Housing Opportunities for Persons with HIV/AIDS

PR-05 Lead & Responsible Agencies – 91.200(b)

1. Agency/entity responsible for preparing/administering the Consolidated Plan

Describe the agency/entity responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	WORCESTER	Office of Economic Development
HOPWA Administrator	WORCESTER	Office of Economic Development
HOME Administrator	WORCESTER	Office of Economic Development
ESG Administrator	WORCESTER	Office of Economic Development

Table 1 – Responsible Agencies

Narrative (optional)

The City Manager's Executive Office of Economic Development (EOED) is the lead administering agency for the City of Worcester, MA, Five-Year Consolidated Submission for Community Planning and Development (2015- 2020) and the Fifth Year Action Plan (7/1/19 - 6/30/20). EOED administers CDBG, HOME, HOPWA and ESG entitlement formula grants for the City of Worcester, MA.

Consolidated Plan Public Contact Information

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AP-10 Consultation – 91.100, 91.200(b), 91.215(l)

1. Introduction

Provide a concise summary of the jurisdiction’s activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l))

Beginning in 2014, the city of Worcester embarked on the development and implementation of a new Five (5) Year Consolidated Plan (2015-2020). In order to establish an updated baseline of community needs for the Consolidated Plan, the city sponsored an extensive public outreach effort in 2014 and 2015, holding a series of eight (8) community needs assessment meetings in various neighborhoods throughout the city, with at least one in each of the city council districts. The meetings were attended by over 110 total participants. This neighborhood outreach was complimented by various individual and group consultations with numerous housing, human, and social service providers in the areas of homelessness, public housing, and services for special needs and low-income populations.

Organizations and community stakeholders representing various segments of the community were involved in the consultations including housing services & assisted housing for-profit and non-profit developers, the Worcester Housing Authority, children & youth services providers, elderly services, the city Elder Affairs Office, Worcester Senior Center, health services including the city Public Health Division's Community Health Improvement Plan Update. Ongoing consultations included collaboration with the Worcester County Continuum of Care, groups representing persons with disabilities including the City Office of Human Rights and Disabilities, consultations with service providers that work with persons with HIV/AIDS and their families, a focus group with providers and funders of basic needs and safety net services for low income people, homeless services providers including those that work with veterans and persons with special needs. Consultations with agencies and other governmental entities were conducted with the city departments/divisions of Public Health, Emergency Operations, Health and Inspectional Services, and Workforce Development, and publicly funded institutions and systems of care such as corrections facilities, medical providers and mental health institutions such as the Worcester County Sherriff's Office, UMass Memorial Medical Center, Community Healthlink, local detox centers, the Massachusetts Department of Mental Health, state and local health and child welfare agencies(crucial for the identification of housing units containing lead-poisoned children), ongoing collaboration with the Massachusetts Department of Public Health, and planning efforts with the Central MA Regional Planning Commission and the Central MA Workforce Investment Board.

The Five (5) Year Consolidated Plan and the subsequent annual action plans helped to inform the proposed fifth year (2019-2020) annual action plan outreach/funding recommendation process. In addition, after the announcement of the availability of Request for Proposals (RFP) for fifth year action plan funding through CDBG, HOPWA, and ESG, a Community Needs Public Hearing was held on January 17, 2019 at City Hall to review and assess updated needs information received through workshops and any additional community input.

Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.

The Executive Office of Economic Development (EOED) works to foster strong relationships and enhance cooperation and coordination between public and private service and housing providers. Development of the Consolidated Plan benefitted from input from a broad range of stakeholders who contributed through interviews and focus groups, in addition to those who were represented at public meetings and hearings. Entities participating in the process included agencies and groups with expertise in areas such as housing, youth services, case management, mental health, education, employment assistance, basic needs, and health services. As a means of gaining input, individual and group consultations were held with providers of public and affordable housing, and services for homeless, special needs, and low-income populations.

Annually, EOED conducts funding overview and technical assistance workshops for parties interested in applying for HUD entitlement funds through CDBG, HOPWA, and ESG, the most recent being held on January 7, 2019. The workshops are designed to focus and facilitate discussion with interested parties in order to define the key social service issues and community needs in Worcester, to identify gaps in service, and to brainstorm potential strategies to address needs and gaps. The workshops were also designed to foster dialogue among agencies/departments to enhance collaboration and the sharing of information. Participating agencies and groups are contained in Table 2 of this section.

A number of plans and reports were consulted in preparation of the Five year Consolidated Plan, reflecting policies, needs or significant research. These are contained in Table 3 of this section.

The City of Worcester actively participates in ongoing efforts to enhance coordination with private industry, businesses, developers, and social service agencies in order to foster economic development. EOED, through the Business Assistance Division, plays a leadership role in the Worcester Business Resource Alliance (WBRA), a centralized network of business professionals, technical assistance providers, lenders, and community development organizations that collectively provide services to entrepreneurs and small business owners and managers. EOED also meets regularly with neighborhood business associations, and coordinates with the Worcester Regional Chamber of Commerce and Worcester Business Development Corporation. At the state level, EOED has strong partnerships with the Mass. Office of Business Development and MassDevelopment, as well as relationships with the

Massachusetts Life Sciences Center and the Massachusetts Manufacturing Extension Partnership (MassMEP).

Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS

2. Describe Agencies, groups, organizations and others who participated in the process and describe the jurisdiction’s consultations with housing, social service agencies and other entities

Other local/regional/state/federal planning efforts considered when preparing the Plan

Table 2 – Agencies, groups, organizations who participated

1	Agency/Group/Organization	CENTRAL MASSACHUSETTS HOUSING ALLIANCE, INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-Victims of Domestic Violence Services-homeless Services-Employment Service-Fair Housing Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CMHA is the lead agency for the annual Continuum of Care (CoC) planning process. This collaborative process involves ongoing consultations with the City and organizations that provide housing and support services for special needs populations including elderly persons, persons with disabilities, persons with HIV/AIDS and homeless persons. These consultations inform the needs assessment, strategic plan, and annual action plan updates.
2	Agency/Group/Organization	SMOC-GREATER WORCESTER HOUSING CONNECTION-AURORA PROGRAM
	Agency/Group/Organization Type	Services - Housing Services-Persons with Disabilities Services-homeless
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted on the extent of chronic homelessness and homelessness for people with disabilities. Outcomes include improved coordination of services for homeless households without children, chronically homeless, and improvement on Coordinated Assessment, Entry, and Housing Placement.
3	Agency/Group/Organization	L.U.K. Crisis Center, Inc.
	Agency/Group/Organization Type	Services - Housing Services-homeless Services-Health Services - Victims Regional organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homelessness Needs - Unaccompanied youth Homelessness Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted on the needs of unaccompanied youth for the Strategic Plan and Annual Action Plan updates. Anticipated outcomes include improved coordination with the Compass Network, a low-barrier access to service network for unaccompanied youth, and the incorporation of homeless youth needs in the scope of CoC work.
4	Agency/Group/Organization	COMMUNITY HEALTHLINK, INC.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Health Agency Regional organization
	What section of the Plan was addressed by Consultation?	Homeless Needs - Chronically homeless Homelessness Needs - Unaccompanied youth Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency is a HOPWA subrecipient and major recipient of Continuum of Care grants. Consulted at workshop with service providers. Anticipated outcomes include increased coordination with the CoC for monitoring and evaluation, services for people with disabilities, basic homeless needs, and coordinated entry.
5	Agency/Group/Organization	Friendly House, Inc.
	Agency/Group/Organization Type	Housing Services - Housing Services-Children Services-homeless Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Homelessness Needs - Unaccompanied youth Homelessness Strategy HOPWA Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Agency is a subrecipient of CDBG and HUD Continuum of Care funds. Consulted at workshop with service providers and during community input meetings. Anticipated outcomes include increased coordination for youth services and services for homeless families with children.
6	Agency/Group/Organization	Catholic Charities
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Persons with Disabilities
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Families with children Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing coordination through the Continuum of Care and consulted at workshop with homeless service providers.
7	Agency/Group/Organization	AIDS Project Worcester
	Agency/Group/Organization Type	Housing Services-Persons with Disabilities Services-Persons with HIV/AIDS Services-homeless Services-Health Services-Education Services-Employment Health Agency

	What section of the Plan was addressed by Consultation?	Housing Need Assessment Homeless Needs - Chronically homeless Homelessness Strategy Non-Homeless Special Needs HOPWA Strategy Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	HOPWA subrecipient consulted at workshop with homeless service providers. Increased coordination for non-homeless special needs and the homeless strategy.
8	Agency/Group/Organization	AFRICAN COMMUNITY EDUCATION PROGRAM, INC.
	Agency/Group/Organization Type	Services-Children Services-Education
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	CDBG subrecipient consulted at Children and Youth Service Provider workshop and at the community needs assessment public hearings to provide input. The consultations support continued coordination and the inclusion of the organization's input in the Consolidated Plan and Annual Action Plans.
9	Agency/Group/Organization	Boys and Girls Club
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participation in the workshop for service providers and the community needs public hearing helped inform the priority needs and goals of the Consolidated plan and the Annual Action Plans.
10	Agency/Group/Organization	Central MA Regional Planning Commission
	Agency/Group/Organization Type	Regional organization Planning organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Market Analysis

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In-person consultation improves the coordination between the City of Worcester and the Central Massachusetts Regional Planning Commission.
11	Agency/Group/Organization	Central MA Workforce Investment Board
	Agency/Group/Organization Type	Services-Employment Regional organization
	What section of the Plan was addressed by Consultation?	Economic Development Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Face-to-face meetings improve coordination for employment and job training opportunities in addition to economic development efforts.
12	Agency/Group/Organization	Centro Las Americas
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons
	What section of the Plan was addressed by Consultation?	Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Subrecipient participation in the workshop for service providers and the community needs public hearing helped inform the priority needs and goals of the Consolidated Plan and the Annual Action Plans.
13	Agency/Group/Organization	Children's Friend
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participation in the focus group for service providers helped inform the priority needs and the goals of the Consolidated Plan and the Annual Action Plans.

14	Agency/Group/Organization	City of Worcester Office of Elder Affairs
	Agency/Group/Organization Type	Services-Elderly Persons Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Face-to-face consultation informed the Consolidated Plan and the Annual Action Plans by providing information related to the needs of elderly persons and fostering improved coordination.
15	Agency/Group/Organization	City of Worcester Office of Human Rights and Disabilities
	Agency/Group/Organization Type	Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Face-to-face meeting to discuss needs related to persons with disabilities. The discussion informed the priority needs and goals of the Consolidated Plan and the Annual Action Plans.
16	Agency/Group/Organization	City of Worcester Youth Opportunities Office
	Agency/Group/Organization Type	Services-Children Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participation in the workshop for service providers anticipated to provide improved coordination around youth services including educational, recreational opportunities, and youth employment, and informs the priority needs and goals of the Consolidated Plan and the Annual Action Plans.
17	Agency/Group/Organization	Ethiopian Dream Center
	Agency/Group/Organization Type	Services-Health Services-Education Services-Employment

	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participation in the workshop for service providers and the community needs public hearings helped to inform the priority needs and goals of the Consolidated Plans and the Annual Action Plans.
18	Agency/Group/Organization	Family Services of Central MA
	Agency/Group/Organization Type	Services-Children Services-Victims of Domestic Violence
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization's participation in the community needs assessment public hearing helped inform the Needs Assessment portion of the Consolidated Plan.
19	Agency/Group/Organization	Girls Inc.
	Agency/Group/Organization Type	Services-Children
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participation in the workshop for service providers helped inform the Needs Assessment and Strategic Plan sections of the Consolidated Plan.
20	Agency/Group/Organization	MAIN SOUTH COMMUNITY DEV CORP
	Agency/Group/Organization Type	Services - Housing Services-Education Services-Employment Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	In-person consultation facilitated continued coordination and helped to inform the Consolidated Plan and the Annual Action Plans.
21	Agency/Group/Organization	Massachusetts Department of Public Health
	Agency/Group/Organization Type	Other government - State
	What section of the Plan was addressed by Consultation?	Lead-based Paint Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	This collaboration ensures that statewide reporting for all children will Elevated Blood levels (EBLs) is managed collectively to catch each EBL prior to poisoned level occurring.
22	Agency/Group/Organization	OAK HILL COMMUNITY DEVELOPMENT CORPORATION
	Agency/Group/Organization Type	Services - Housing Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Housing Need Assessment Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The in-person consultation is anticipated to continue coordination and helped inform the Consolidated Plan and Annual Action Plans.
23	Agency/Group/Organization	Pernet Family Health Services
	Agency/Group/Organization Type	Services-Children Services-Health Neighborhood Organization
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization's participation in a workshop for service providers helped inform the Needs Assessment and Strategic Plan sections of the Consolidated Plan.

24	Agency/Group/Organization	Regional Environmental Council
	Agency/Group/Organization Type	Services - Nutrition, Urban Gardening, Youth Development
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization's participation in a workshop for service providers helped inform the Needs Assessment and Strategic Plan sections of the Consolidated Plan.
25	Agency/Group/Organization	SOUTHEAST ASIAN COALITION OF CENTRAL MA
	Agency/Group/Organization Type	Services-Children Services-Elderly Persons Services-Education Services-Employment
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participation in the workshop for service providers and the community needs public hearing helped inform the priority needs and the goals of the Consolidated Plan and the Annual Action Plans.
26	Agency/Group/Organization	South Worcester Neighborhood Improvement Corporation
	Agency/Group/Organization Type	Services-Children Food Pantry
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization's participation helped inform the Needs Assessment and Strategic Plan sections of the Consolidated Plan.
27	Agency/Group/Organization	WORCESTER COMMON GROUND, INC.
	Agency/Group/Organization Type	Services - Housing Neighborhood Organization

	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The in-person consultation is anticipated to continue coordination and helped to inform the Consolidated Plan and Annual Action Plans.
28	Agency/Group/Organization	Worcester Housing Authority
	Agency/Group/Organization Type	PHA
	What section of the Plan was addressed by Consultation?	Public Housing Needs Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Consulted recently completed 5-Year Agency Plan to establish Authority mission, priorities and planned investments in coming years. Face-to-face meeting to gather input concerning public housing needs, planned programs, and activities.
29	Agency/Group/Organization	Worcester Senior Center
	Agency/Group/Organization Type	Services-Elderly Persons Other government - Local
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The face-to-face meeting and ongoing collaboration provides critical input for meeting the needs of elderly persons.
30	Agency/Group/Organization	City of Worcester Public Health Division
	Agency/Group/Organization Type	Services-Health Other government - County
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Non-Community Development Needs

	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Ongoing collaboration through the Worcester Lead Abatement Program guides the lead-based paint strategy. Additionally, EOED staff attended the Greater Worcester Regional Community Health Improvement Plan (CHIP) Update public meeting. The CHIP informs the priority needs and goals of the Consolidated Plan and the Annual Action Plans.
31	Agency/Group/Organization	WORCESTER COMMUNITY ACTION COUNCIL
	Agency/Group/Organization Type	Other government - Local Regional organization Anti-Poverty Agency
	What section of the Plan was addressed by Consultation?	Non-Homeless Special Needs Anti-poverty Strategy
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The organization's participation in a workshop for service providers helped inform the Needs Assessment and Strategic Plan sections of the Consolidated Plan.
32	Agency/Group/Organization	WORCESTER EAST SIDE CDC
	Agency/Group/Organization Type	Services - Housing Community Development Corporation
	What section of the Plan was addressed by Consultation?	Housing Need Assessment
	Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	The in-person consultation is anticipated to continue coordination and inform the Consolidated Plan and the Annual Action Plans.
33	Agency/Group/Organization	Y.O.U. Inc.
	Agency/Group/Organization Type	Services-Children Services-Health Services-Education
	What section of the Plan was addressed by Consultation?	Non-Housing Community Development Needs

Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?	Participation in the community needs public hearing helped inform the priority needs and goals of the Consolidated Plan and the Annual Action Plans.
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Table 3 – Agencies, groups, organizations who participated

Identify any Agency Types not consulted and provide rationale for not consulting

The City of Worcester developed its Consolidated Plan and Annual Action Plans as a result of extensive consultation with housing, social and health service providers, local and regional agencies, and the Worcester Housing Authority. The City has consulted with all of agencies known to be relevant to the Consolidated Plan.

Other local/regional/state/federal planning efforts considered when preparing the Plan

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Continuum of Care	Central MA Housing Alliance	The Continuum of Care Action Plan is an integral part of the City's efforts to address homelessness, including expanding resources for homeless prevention, resolving barriers to housing for homeless persons, and participating in a coordinated entry system.
Worcester Housing Authority 5-Year and Annual Plan	Worcester Housing Authority	The Worcester Housing Authority is responsible for providing decent, safe, and sanitary housing for very low- to moderate-income households, which overlaps with the Strategic Plan goals related to affordable housing and providing access to public housing.
Draft ADA Self-Evaluation (2014)	City of Worcester	The goals of the Strategic Plan include public facility improvements that address the large number of aging buildings and other facilities that pose barriers to residents with disabilities.
CMWIB Strategic Plan FY 2015 to 2017	Central Massachusetts Workforce Investment Board	The goals of the Strategic Plan in the Consolidated Plan overlap with the CMWIB goals related to building the skills of the workforce and fostering economic development
Greater Worcester Region CHIP	Central MA Regional Public Health Alliance	The goals of the Strategic Plan align with the Greater Worcester Region Community Health Improvement Plan (CHIP) in order to improve upon the services provided to residents and to strengthen the public health system.

Name of Plan	Lead Organization	How do the goals of your Strategic Plan overlap with the goals of each plan?
Housing Market Study (2012)	City of Worcester	This report helps guide the Strategic Plan goals related to affordable housing development and preservation as well as healthy and sustainable housing.
Analysis of Impediments to Affordable Housing (2012)	City of Worcester	This report helps guide the Strategic Plan goals related to affordable housing development and preservation.
HOPWA Needs Analysis (2011)	City of Worcester	This report informed the HOPWA Annual Action Plans.
Union Hill Neighborhood Revitalization Action Plan	City of Worcester and Worcester Business Development Corporation	The Union Hill Neighborhood Revitalization Action Plan (2014) guides revitalization efforts in the Union Hill neighborhood, a geographic priority area identified in the Strategic Plan.

Table 4 – Other local / regional / federal planning efforts

Narrative (optional)

The City of Worcester consulted and will continue to coordinate with the Central MA Workforce Investment Board and the Central MA Regional Planning Commission with regard to needs that go beyond the local jurisdiction, such as workforce development, transportation, and regional housing planning issues. Additionally, the City has a history of participation in state-wide efforts to eliminate childhood lead poisoning and has taken a lead role in the local coordination among critical agencies. The EOED collaborates with the MA Department of Public Health and the Worcester Department of Public Health, and is also actively involved with the Worcester Green and Healthy Homes Coalition (WGHC), a joint effort of public and private agencies, grassroots organizations, and concerned citizens committed to eliminating home health hazards, promoting energy efficiency, and improving health and quality of life in Worcester. Additionally, the EOED is enhancing collaboration with Worcester's Department of Public Health and Worcester Public Schools to provide in-home interventions for school age children that have direct health issues related to housing.

In conformity HUD directives, the City of Worcester Draft Fifth Year Action Plan (7/1/19 – 6/30/20) is being made available for a 30-day public review and comment period from May 29, 2019 to June 28, 2019. A hardcopy of said Draft Fifth Year Annual Action Plan will be available at the City of Worcester, Executive Office of Economic Development (EOED), City Hall, 455 Main Street, 4th Floor, Room 404, Worcester, MA 01608 (open 8:30 AM - 5 PM, normal working days). An electronic copy will also be available at: <http://www.worcesterma.gov/e-services/document-center/neighborhood-development>. Persons wishing to submit comments regarding the City of Worcester Fifth Year Action Plan funding recommendations can submit them in writing by 5 P.M., June 28, 2019 to the City of Worcester, Executive Office of Economic Development, City Hall, 455 Main Street, 4th Floor, Room 404, Worcester, MA 01608 or by email to development@worcesterma.gov.

A public hearing was also scheduled to be held from 5:30 P.M., Wednesday, June 12, 2019, 2019 in City Hall Room 401, 455 Main Street, Worcester MA to discuss the Draft Annual Action Plan and respond to interested parties.

AP-12 Participation – 91.105, 91.200(c)

1. Summary of citizen participation process/Efforts made to broaden citizen participation Summarize citizen participation process and how it impacted goal-setting

Beginning in 2014, the city of Worcester embarked on the development and implementation of a new Five (5) Year Consolidated Plan (2015-2020). In order to establish an updated baseline of community needs for the Consolidated Plan, the city sponsored an extensive public outreach effort in 2014 and 2015, holding a series of eight (8) community needs assessment meetings in various neighborhoods throughout the city, with at least one in each of the city council districts. The meetings were attended by over 110 total participants. This neighborhood outreach was complimented by various individual and group consultations with numerous housing, human, and social service providers in the areas of homelessness, public housing, and services for special needs and low-income populations.

The Five (5) Year Consolidated Plan and the subsequent annual action plans helped to inform the proposed fifth year (2019-2020) annual action plan outreach/funding recommendation process. In addition, after the announcement of the availability of Request for Proposals (RFP) for fifth year action plan funding through CDBG, HOPWA, and ESG, a Community Needs Public Hearing was held on January 17, 2019 at City Hall to review and assess updated needs information received through workshops and any additional community input.

The Community Development Advisory Committee (CDAC), has traditionally served as the formal citizen body that provides input on funding applications submitted as part of the city's CDBG RFP process. The CDAC is a citizen advisory committee comprised of ten members, with two from each of Worcester's five council districts. This year, the CDAC met seven times from October 2018 through March 2019 to review and evaluate the CDBG proposals and listen to presentations and ask questions of all of the Public Services, Public Facilities and Improvements, and City Interdepartmental applicants that submitted proposals in response to the RFP.

While the CDAC issues initial advisory recommendations on funding allocations, it is the city administration, through the city manager, that ultimately recommends which CDBG projects and activities to fund which form the basis of the annual action plan.

HOPWA proposals were vetted by the city administration together with the HOPWA Advisory Committee. This committee is composed of experts in community health and the HIV/AIDS field in Worcester County and Connecticut. The process was similar to CDAC in its review,

including holding a public meeting to introduce the HOPWA process and guidelines, a technical assistance meeting for interested applicants, and a review and ranking session held in public at City Hall.

ESG proposals were vetted by an ESG RFP Review Committee that was comprised of members of the Worcester City and County Continuum of Care (CoC), and local funders of such social services such as the United Way. The ESG RFP Review Committee also followed a similar process to the CDAC in its review, including holding a public meeting to introduce the ESG process and guidelines, a technical assistance meeting for interested applicants, and an RFP review and ranking session at City Hall.

Citizen Participation Outreach

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
1	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non-targeted/broad community	1st Community Development Advisory Committee (CDAC) meeting 10/30/18. Attendance: 6 CDAC, 3 city staff.	Briefing on Public Services & Public Facilities programs. Discussion on Organizational Items for Year 45 Action Plan Process.	All comments were received.	Http://ec4cc/jhfb24c2

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper ad, other media, direct correspondence	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	12/18/18 Bilingual ad & city web posting: Request for Proposals available for CDBG, HOPWA, ESG for programs to be funded 7/1/19 - 6/30/20; funding overview and technical assistance workshop to be held 1/9/19, public hearing on community needs to be held 1/17/19.	n/a	n/a	http://www.worcesterma.gov/uploads/d8/a8/d8a8bff3b77c28d4466e764673aa4219/year-45-rfp-process.pdf
3	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non-targeted/broad community	Technical assistance workshop 1/9/19. Attendance: 22 public (19 potential applicant agencies represented), 7 city staff.	Provide information on HUD programs and RFP applications for potential applicants	All comments and questions were entertained.	http://www.worcesterma.gov/uploads/59/59/5993fdce2b6dlc7e5a737954d1993f84/fy2020-rfp-technical-assistance-workshop-presentation.pdf
4	Public Hearing Filmed for City Gov't Access Channel TV rebroadcasts	Non-English Speaking - Specify other language: Spanish Non-targeted/broad community	Public Hearing #1 1/17/19. Attendance: 12 public; 5 city staff.	Allow public input on and discuss 5-Year Conplan priorities and inform 5 th Year Action Plan recommendation process.	All comments were received.	http://www.worcesterma.gov/agendas-minutes/committees-groups/community-development-block-grant-public-hearings/2019/20190117.pdf

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
5	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non- targeted/broad community	2nd Community Development Advisory Committee (CDAC) meeting 2/7/19. Attendance: 9 CDAC, 3 city staff.	Distribute Yr. 45 Binders to CDAC. Overview of CDBG Yr. 45 RFP Application Types. Discussion of 2/21/19 Applicant Presentation Session.	All comments were received.	http://ec4.cc/bsb9bf9c
6	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non- targeted/broad community	3 rd Community Development Advisory Committee (CDAC) meeting 2/21/19 features RFP Applicant Project Presentations for Public Services and Public Facilities. Attendance: 46 public (23 applicants with 27 project proposals), 7 CDAC, 4 city staff.	Received presentations from RFP Public Services and Public Facilities applicants to better evaluate RFPs.	CDAC allowed to ask questions of the RFP presenters (restricted by specified, per-applicant time limits).	http://ec4.cc/b2253287

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
7	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non-targeted/broad community	4 th Community Development Advisory Committee (CDAC) meeting 2/28/19 features Applicant Presentations for Inter- departmental Projects followed by discussion of Public Services Applications #1-11. Attendance: 4 applicants with 5 proposals, 6 CDAC, 4 city staff.	Received presentation from RFP Inter-departmental applicants to better evaluate RFPs.. Discussion and evaluation of Public Service applications #1-11 from CDAC Yr. 44 Application Binder.	CDAC allowed to ask questions of the RFP presenters (restricted by specified, per-applicant time limits). Discussion and evaluation of Public Services applications #1-11 .	http://ec4.cc/c23a6fb8
8	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non-targeted/broad community	5th Community Development Advisory Committee (CDAC) meeting 3/7/19. Discussion of Public Services Applications # 12-21. Attendance: 8 CDAC, 4 city staff.	Discussion and evaluation of Public Service applications #12-21 from CDAC Yr. 45 Application Binder.	Discussion and evaluation of public service applications #12-21.	http://ec4.cc/c276cb36
9	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non-targeted/broad community	6th Community Development Advisory Committee (CDAC) meeting 3/14/19. Discussion of Public Facilities and Inter-departmental Application. Attendance: 7 CDAC, 3 city staff.	Discussion and evaluation of Public Facility and Inter-departmental applications from CDAC Yr. 45 Application Binder	Discussion and evaluation of Public Facility and Inter-departmental applications.	Http://ec4.cc/2894c3d

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
8	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non-targeted/broad community	7th Community Development Advisory Committee (CDAC) meeting 3/28/19. Attendance: 8 CDAC, 3 city staff.	Summary of CDBG Yr. 45 cumulative evaluation scores. Discussion of draft CDAC letter to City Manager regarding CDBG Yr. 45 recommendations.	All comments and questions were entertained.	http://ec4.cc/c22a6c32
9	Public Meeting	Non-targeted/broad community	HOPWA Advisory Committee meetings. Attendance: HOPWA Committee comprised of experts in community health and HIV/AIDS field in Worcester County and Connecticut, city staff.	Review HOPWA process, guidelines, technical assistance for interested applicants, public review and ranking of RFPs.	All comments and questions were received.	http://www.worcesterma.gov/uploads/d8/a8/d8a8bff3b77c28d4466e764673aa4219/year-45-rfp-process.pdf
10	Public Meeting	Non-targeted/broad community	ESG RFP Review Committee meetings. Attendance: Representatives from Worcester City and County Continuum of Care (COC) and local social services funders, city staff.	Review ESG process, guidelines, technical assistance for interested applicants, public review and ranking of RFPs.	All comments and questions were received.	http://www.worcesterma.gov/uploads/d8/a8/d8a8bff3b77c28d4466e764673aa4219/year-45-rfp-process.pdf

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
11	Public Meeting Filmed for City Gov't Access Channel TV rebroadcasts	Non- targeted/broad community	City Council Standing Committee on Public Health and Human Services meeting 5/16/19 to review and discuss 5 th Year Action Plan funding recommendations for CDBG, HOME, ESG, HOPWA.	Discussion and review of 5 th Year Action Plan funding recommendations for CDBG, HOME, ESG, HOPWA. .	All comments and questions were received. Committee voted full approval of the Year 45 Action Plan	

Table 5 – Citizen Participation Outreach

Expected Resources

AP-15 Expected Resources – 91.220(c)(1,2)

Introduction

The following is the anticipated resources the City is expected to receive from CDBG, HOME, HOPWA, and ESG programs. CDBG funds will be used for housing, public improvements, and public service activities. The HOME program is mainly used for new housing unit production. CDBG increased by 0.3%, HOME Program decreased by 7.3%. The HOPWA program was increased by 8.1%. This program is used for case management and rental assistance for people living with HIV/AIDS. The Emergency Solutions Grant is increased by 4.1% year over year. ESG funds are used primarily for homeless prevention and reducing barriers to housing for the homeless population.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	4,382,360	50,000	1,608,631	6,040,991	6,040,991	0.3% increase year over year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,465,353	10,000	1,226,768	2,702,121	2,702,121	7.3% reduction year over year.
HOPWA	public - federal	Permanent housing in facilities Permanent housing placement Short term or transitional housing facilities STRMU Supportive services TBRA	635,000	0	93,320	728,320	728,320	8.1% increase year over year.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	370,659	0	18,493	389,152	389,152	4.1% increase year over year.

Table 6 - Expected Resources – Priority Table

Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied

Federal funds will be used to leverage other public and private resources in the housing, public facilities, public services, and economic development areas. Matching fund requirements, along with the needed documentation, are specified in the subrecipient agreements. Matching funds include non-federal cash sources, infrastructure, appraised land/real property, and site preparation, construction materials, and donated labor. The City and its program partners will seek funds from the following sources to support the goals identified in this ConPlan: Project-based Section 8 certificates through the Worcester Housing Authority, Low-income housing tax credits, project financing at favorable interest rates from the MassHousing and local lenders, and private contributions to subrecipients.

The City of Worcester will continue to identify funding from the Massachusetts Rental Voucher Program, operated by the Dept. of Housing and Community Development, as a source of additional match. In order to meet its ESG match requirements, the City of Worcester requires all ESG subrecipients to demonstrate a 100% match using other eligible federal, state, local, or private resources.

If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan

Discussion

The Non-Housing Community Development Needs Analysis in the 5-Year Consolidated Plan provides a description of the needs associated with publicly owned land and property. The City of Worcester owns over 4.5 million square feet of buildings and facilities that either directly service residents, or exist to house activities that service residents. Many of these buildings and facilities may be used to address needs identified in the Conplan, yet many of the facilities are also in need of improvements due to old age, deferred maintenance, and heavy use.

In an effort to address public facilities goals contained in the 2015-2020 Consolidated Plan \$500,000 in CDBG funds have been allocated in the Fifth Year Action Plan to improve streets, sidewalks, and other forms of eligible public infrastructure within the Green Island neighborhood (in tandem with improvements made by other city departments, public and private partners. Likewise, \$350,000 in CDBG funds has been allocated to the Neighborhood Development Fund which will also be used to improve streets, sidewalks, sewers, and other forms of eligible public infrastructure. Both of the allocations will benefit low- and moderate-income persons and communities.

Discussion

Overall the projected trend is a 2-10% reduction of Federal Funds in the remaining three years of the five year Conplan in order to address identified priority needs.

Annual Goals and Objectives

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Affordable Housing Development & Preservation	2015	2019	Affordable Housing	Union Hill Target Area Low-Moderate Income Census Tracts	Assistance for first time homebuyers Development of new affordable housing Development of new mixed-income housing Housing maintenance services Housing repair services Rehabilitation of existing housing stock	CDBG: \$2,543,494 HOME: \$2,751,512	Rental units constructed: 2 Household Housing Unit Rental units rehabilitated: 30 Household Housing Unit Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 17 Household Housing Unit Direct Financial Assistance to Homebuyers: 15 Households Assisted Tenant-based rental assistance / Rapid Rehousing: 50 Households Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
2	Healthy and Sustainable Housing	2014	2019	Non-Housing Community Development	Low-Moderate Income Census Tracts	Demolition of blighted properties Environmental preservation Home energy efficiency improvements Housing contaminant and pest abatement Housing inspections and code enforcement Systematic housing inspections Weatherization of homes	CDBG: \$174,316	Buildings Demolished: 2 Buildings Housing Code Enforcement/Foreclosed Property Care: 847 Household Housing Unit

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
3	Neighborhood Stabilization & Revitalization	2015	2019	Non-Housing Community Development	Low-Moderate Income Census Tracts	Assistance for first time homebuyers Demolition of blighted properties Development of new affordable housing Development of new mixed-income housing Elimination of area and spot blight Housing contaminant and pest abatement Housing inspections and code enforcement Housing maintenance services Housing repair services Improvement of existing public infrastructure Infill development	CDBG: \$659,766	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 4925 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
4	Economic Development & Business Assistance	2015	2019	Non-Housing Community Development	Low-Moderate Income Census Tracts	Attraction and retention of new businesses Economic development loans and capital Job and employment opportunities Job and skills training Recreational and community facilities Small business and storefront improvements Small business assistance Technical assistance to small businesses	CDBG: \$288,168	Facade treatment/business building rehabilitation: 5 Business Jobs created/retained: 10 Jobs Businesses assisted: 10 Businesses Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
5	Public Services for Low-Moderate Income Persons	2015	2019	Non-Homeless Special Needs Non-Housing Community Development	Low-Moderate Income Census Tracts	Case management services Food access and security Health services Information and referral to public services Information and services for new immigrants Transportation and access to public services Youth educational and recreational programs	CDBG: \$815,405	Public service activities other than Low/Moderate Income Housing Benefit: 4793 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Improvements and Preservation of Public Facilities	2015	2019	Non-Housing Community Development	Low-Moderate Income Census Tracts	Accessibility improvements for public facilities Energy improvements for public facilities Improvement of existing public infrastructure Improving public facilities for public services New streets and sidewalks	CDBG: \$1,545,770	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 91275 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	Expanded Resources for Homeless Prevention	2015	2019	Homeless	Low-Moderate Income Census Tracts	Access to public housing Case management services Discharge planning Housing search and advocacy Housing security and eviction prevention Housing stabilization funds Information and referral to public services Mental health and substance abuse services Services for disabled or special needs population	ESG: \$8,834	Tenant-based rental assistance / Rapid Rehousing: 68 Households Assisted Homeless Person Overnight Shelter: 450 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
8	Resolve Barriers to Housing for Homeless Persons	2015	2019	Homeless	Low-Moderate Income Census Tracts	Access to public housing Case management services Coordinated entry system Housing search and advocacy Housing stabilization funds Information and referral to public services Mental health and substance abuse services Rapid re-housing rental assistance Services for disabled or special needs population	ESG: \$405,381	Overnight/Emergency Shelter/Transitional Housing Beds added: 50 Beds Homelessness Prevention: 118 Persons Assisted

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
9	Housing Opportunities for Persons with HIV/AIDS	2015	2019	Homeless Non-Homeless Special Needs	Low- Moderate Income Census Tracts	Case management services Housing search and advocacy Housing security and eviction prevention Rapid re-housing rental assistance Transportation and access to public services	HOPWA: \$587,285	Homelessness Prevention: 82 Persons Assisted Housing for People with HIV/AIDS added: 20 Household Housing Unit HIV/AIDS Housing Operations: 12 Household Housing Unit

Table 7 – Goals Summary

Goal Descriptions

1	Goal Name	Affordable Housing Development & Preservation
	Goal Description	The affordable housing development & preservation goal includes the development of new and mixed use affordable housing, rehabilitation of existing housing stock, maintenance & repair services, and assistance to first time homebuyers.
2	Goal Name	Healthy and Sustainable Housing
	Goal Description	The healthy and sustainable housing goal includes environmental preservation, weatherization & energy efficiency improvements, housing inspections & code enforcements, systematic housing inspections, and contaminant and pest abatement.

3	Goal Name	Neighborhood Stabilization & Revitalization
	Goal Description	The neighborhood stabilization & revitalization goal includes the development of new affordable housing, development of new mixed-income housing, rehabilitation of existing housing stock, housing maintenance services, housing repair services, assistance for first-time homebuyers, systematic housing inspections, housing contaminant and pest abatement, housing inspections and code enforcement, demolition of blighted properties, elimination of area and spot blight, infill development, new streets and sidewalks, improvement of existing public infrastructure, small business assistance, small business and storefront improvements, revitalization of neighborhoods, and neighborhood public safety improvements.
4	Goal Name	Economic Development & Business Assistance
	Goal Description	The economic development & business assistance goal includes small business assistance, job and employment opportunities, attraction and retention of new businesses, job and skills training, recreational and community facilities, economic development loans, and capital, small businesses and storefront improvements, and technical assistance to small businesses.
5	Goal Name	Public Services for Low-Moderate Income Persons
	Goal Description	The public services for low-moderate income persons goal includes housing maintenance services, environmental preservation, youth educational and recreational programs, neighborhood public safety improvements, information and referral to public services, health services, youth employment opportunities, food access and security, housing security and eviction prevention, senior and elderly services, services for disabled or special needs population, information and services for new immigrants, transportation and access to public services, and substance abuse services.
6	Goal Name	Improvements and Preservation of Public Facilities
	Goal Description	The improvements and preservation of public facilities goal includes new streets and sidewalks, improvement of existing public infrastructure, improving public facilities for public services, improving public facilities serving public safety, energy improvements for public facilities, and accessibility improvements for public facilities.

7	Goal Name	Expanded Resources for Homeless Prevention
	Goal Description	Ensure sufficient resources are available for helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.
8	Goal Name	Resolve Barriers to Housing for Homeless Persons
	Goal Description	This goal is designed to help homeless persons, especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth, make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness and facilitating access for homeless individuals and families to affordable housing units.
9	Goal Name	Housing Opportunities for Persons with HIV/AIDS
	Goal Description	Using City of Worcester HOPWA funds, community-based organizations offer housing resources to PLWHA, including short-term rent, mortgage, and utility assistance payments, rental assistance, and supportive services to address varying needs and barriers to stable housing: Recognizing that being stably housed plays a critical role in ensuring that individuals living with HIV live healthy and productive lives, this goal ensures that housing assistance and supportive services are available to low-income people living with HIV/AIDS (PLWHA) in the areas of Worcester County and Northeastern Connecticut in order to avoid homelessness, or obtain stable housing.

Projects

AP-35 Projects – 91.220(d)

Introduction

The City of Worcester is creating 16 projects to address the goals identified in year 4 (7/1/18 - 6/30/19) of the Action Plan. These 16 projects will address the relevant goals that they are meeting and identify the sources of funds to be used.

Projects

#	Project Name
1	PUBLIC SERVICES
2	NEIGHBORHOOD DEVELOPMENT FUND
3	PUBLIC FACILITIES FUND
4	AFFORDABLE HOUSING PROGRAMS
5	ECONOMIC DEVELOPMENT
6	CODE ENFORCEMENT
7	DEBT SERVICE
8	HOPWA18 AIDS PROJECT WORCESTER
9	HOPWA18 COMMUNITY HEALTHLINK
10	HOPWA18 MONTACHUSETT OPPORTUNITY COUNCIL
11	HOPWA18 CT PERCEPTION PROGRAMS
12	HOPWA18 GRANTEE ADMIN
13	HESG18 - WORCESTER
14	CDBG PLANNING & ADMINISTRATION
15	HOME ADMIN
16	TBRA (TENANT BASED RENTAL ASSISTANCE)
17	GREEN ISLAND PROJECTS

Table 8 - Project Information

Describe the reasons for allocation priorities and any obstacles to addressing underserved needs

Challenges to meeting underserved needs in the coming year stem primarily from increasing demand for program activities combined with decreasing amounts of funding. In order to maximize efficiency and achieve a greater impact, the City proposes the following actions:

- Annually, EOED conducts funding overview and technical assistance workshops for parties interested in applying for HUD entitlement funds through CDBG, HOPWA, and ESG, (usually

planned for November). The workshops are designed to focus and facilitate discussion with interested parties in order to define the key social service issues and community needs in Worcester, to identify gaps in service, and to brainstorm potential strategies to address needs and gaps. The workshops were also designed to foster dialogue among agencies/departments to enhance collaboration and the sharing of information.

- Continue to work to improving access to services by persons with limited English proficiency in order to reach underserved populations. According to recent U.S. Census American Community Survey data, 18 percent of the Worcester population speaks a language other than English and speaks English less than “very well.” It is therefore important to ensure that critical programs and services address language and cultural barriers that isolate households and impede successful utilization of community resources. This proposed action includes developing a Language Assistance Plan for HUD Entitlement Programs.

AP-38 Project Summary
Project Summary Information

1	Project Name	PUBLIC SERVICES
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Public Services for Low-Moderate Income Persons
	Needs Addressed	Youth educational and recreational programs Information and referral to public services Health services Food access and security Information and services for new immigrants Transportation and access to public services Case management services
	Funding	CDBG: \$639,783
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
2	Project Name	NEIGHBORHOOD DEVELOPMENT FUND
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Neighborhood Stabilization & Revitalization

	Needs Addressed	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers Systematic housing inspections Housing contaminant and pest abatement Elimination of area and spot blight Infill development New streets and sidewalks Small business assistance Recreational and community facilities Economic development loans and capital Small business and storefront improvements Technical assistance to small businesses Revitalization of neighborhoods Neighborhood public safety improvements
	Funding	CDBG: \$734,137
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
3	Project Name	PUBLIC FACILITIES FUND
	Target Area	Union Hill Target Area Low-Moderate Income Census Tracts
	Goals Supported	Improvements and Preservation of Public Facilities
	Needs Addressed	New streets and sidewalks Improvement of existing public infrastructure Improving public facilities for public services Improving public facilities serving public safety Energy improvements for public facilities Accessibility improvements for public facilities

	Funding	CDBG: \$670,000
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
4	Project Name	AFFORDABLE HOUSING PROGRAMS
	Target Area	Union Hill Target Area Low-Moderate Income Census Tracts
	Goals Supported	Affordable Housing Development & Preservation
	Needs Addressed	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers Infill development
	Funding	CDBG: \$1,003,034 HOME: \$2,388,085
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
5	Project Name	ECONOMIC DEVELOPMENT
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Economic Development & Business Assistance

	Needs Addressed	Small business assistance Job and employment opportunities Attraction and retention of new businesses Job and skills training Recreational and community facilities Economic development loans and capital Small business and storefront improvements Technical assistance to small businesses
	Funding	CDBG: \$293,034
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
6	Project Name	CODE ENFORCEMENT
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Healthy and Sustainable Housing
	Needs Addressed	Systematic housing inspections Housing contaminant and pest abatement Housing inspections and code enforcement Home energy efficiency improvements Weatherization of homes Environmental preservation
	Funding	CDBG: \$174,485
	Description	The Systematic Housing Inspections Program is expected to arrest neighborhood decline and deterioration by proactively identifying and inspecting for code violations in neighborhoods and by undertaking activities to demolish hazardous buildings in order to stabilize immediate area, and to eliminate specific conditions of blight or physical decay on a spot basis throughout the City of Worcester.
	Target Date	6/30/2020

	Estimate the number and type of families that will benefit from the proposed activities	It is estimated that 847 units of housing will be inspected benefitting up to that amount of families with the proposed activity. At least 2 families in the surrounding areas to the projects sites will benefit from this activity.
	Location Description	The Systematic Housing Inspections Program will take place will be in a Low-Moderate area's of the City. Previous locations included Union Hill and Main South areas. Demolition activities can occur throughout the City.
	Planned Activities	
7	Project Name	DEBT SERVICE
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Affordable Housing Development & Preservation
	Needs Addressed	Development of new affordable housing
	Funding	CDBG: \$250,045
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
Planned Activities		
8	Project Name	HOPWA19 AIDS PROJECT WORCESTER
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Housing Opportunities for Persons with HIV/AIDS
	Needs Addressed	Housing security and eviction prevention Transportation and access to public services Case management services Housing search and advocacy Rapid re-housing rental assistance Housing stabilization funds
	Funding	HOPWA: \$305,388

	Description	AIDS Project Worcester uses HOPWA funds to continue its Housing Services Program for people living with HIV/AIDS (PLWHA) in Central MA, through homelessness prevention and rental start up assistance.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	87 households with at least one member living with HIV/AIDS
	Location Description	City of Worcester Eligible Metropolitan Statistical Area (EMSA)
	Planned Activities	The program consists of four components: 1) Short-term rent, mortgage, and utility assistance (STRMU); 2) Permanent Housing Placement, providing payments for the first and last months' rent for eligible clients; 3) Tenant-Based Rental Assistance and 4) Housing Case Management.
9	Project Name	HOPWA19 COMMUNITY HEALTHLINK
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Housing Opportunities for Persons with HIV/AIDS
	Needs Addressed	Transportation and access to public services Mental health and substance abuse services Case management services Housing search and advocacy
	Funding	HOPWA: \$139,279
	Description	Description Community Healthlink, Inc. is a non-profit organization that provides housing supportive services to people living with HIV/AIDS.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	12 households with at least one family member living with HIV/AIDS.
	Location Description	City of Worcester Eligible Metropolitan Statistical Area (EMSA)
	Planned Activities	Housing Supportive Services within Permanent Supportive Housing programs assist tenants in maintaining permanent housing; maintaining their use of community resources and benefits; and achieve short term goals towards self-sufficiency.
10	Project Name	HOPWA19 MONTACHUSETT OPPORTUNITY COUNCIL
	Target Area	Low-Moderate Income Census Tracts

	Goals Supported	Housing Opportunities for Persons with HIV/AIDS
	Needs Addressed	Housing security and eviction prevention Transportation and access to public services Case management services Housing search and advocacy Rapid re-housing rental assistance
	Funding	HOPWA: \$174,188
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	8 chronically homeless individuals living with HIV/AIDS and their family members.
	Location Description	City of Worcester Eligible Metropolitan Statistical Area (EMSA).
	Planned Activities	Funding for Rental Assistance and Supportive Services for the Housing First Supportive Housing program, a scattered site 7-unit permanent housing program in North Worcester County.
11	Project Name	HOPWA19 CT PERCEPTION PROGRAMS
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Housing Opportunities for Persons with HIV/AIDS
	Needs Addressed	Transportation and access to public services Case management services Housing search and advocacy Housing stabilization funds
	Funding	HOPWA: \$90,415
	Description	Funding for Supportive Services and Permanent Housing Placement, providing payments for the first and last months rent for eligible clients.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	7 individuals living with HIV/AIDS
	Location Description	Located in Willimantic, Connecticut within the City of Worcester Eligible Metropolitan Statistical Area (EMSA).

	Planned Activities	HOPWA supportive services assess and facilitate positive life skills for individuals to create Individualized Service Plans that include employment, alternative income sources, access to affordable housing, and housing retention skills. HOPWA operating costs facilitate maintenance of the Summit House vehicle to transport clients to and from medical and employment appointments. HOPWA permanent housing placement offers financial assistance in the form of rental start-up support to residents who are transitioning to independent living.
12	Project Name	HOPWA19 GRANTEE ADMIN
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Housing Opportunities for Persons with HIV/AIDS
	Needs Addressed	Housing security and eviction prevention Transportation and access to public services Case management services Housing search and advocacy Rapid re-housing rental assistance
	Funding	HOPWA: \$19,050
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	The total households expected to benefit from HOPWA services under the Year 3 Action Plan is 108 households.
	Location Description	City of Worcester Eligible Metropolitan Statistical Area (EMSA).
	Planned Activities	Financial Management and Program Oversight of HOPWA activities: <ul style="list-style-type: none"> •Housing Supportive Services •Tenant-Based Rental Assistance •Short-Term Rent, Mortgage, and Utility Assistance •Permanent Housing Placement •Housing Facility Operations
13	Project Name	HESG19 - WORCESTER
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Expanded Resources for Homeless Prevention Resolve Barriers to Housing for Homeless Persons

	Needs Addressed	Information and referral to public services Housing security and eviction prevention Services for disabled or special needs population Mental health and substance abuse services Access to public housing Case management services Coordinated entry system Discharge planning Housing search and advocacy Rapid re-housing rental assistance Housing stabilization funds
	Funding	ESG: \$389,152
	Description	Emergency Solutions Grant Program supports City-wide strategies to address the housing needs of homeless and at-risk households in the City of Worcester.
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 686 homeless and at-risk households (individual and family).
	Location Description	City of Worcester
	Planned Activities	Street Outreach Emergency Shelter Rapid Re-Housing Homelessness Prevention HMIS
14	Project Name	CDBG PLANNING & ADMINISTRATION
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Affordable Housing Development & Preservation Healthy and Sustainable Housing Neighborhood Stabilization & Revitalization Economic Development & Business Assistance Public Services for Low-Moderate Income Persons Improvements and Preservation of Public Facilities

	Needs Addressed	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers Systematic housing inspections Housing contaminant and pest abatement Housing inspections and code enforcement Home energy efficiency improvements Weatherization of homes Environmental preservation Demolition of blighted properties Elimination of area and spot blight Infill development New streets and sidewalks Improvement of existing public infrastructure Small business assistance Job and employment opportunities Attraction and retention of new businesses Job and skills training Recreational and community facilities Economic development loans and capital Small business and storefront improvements Technical assistance to small businesses Improving public facilities for public services Revitalization of neighborhoods Improving public facilities serving public safety Energy improvements for public facilities Accessibility improvements for public facilities Youth educational and recreational programs Neighborhood public safety improvements Information and referral to public services Health services Youth employment opportunities Food access and security Housing security and eviction prevention Senior and elderly services Services for disabled or special needs population Information and services for new immigrants Transportation and access to public services
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	Funding	CDBG: \$876,472
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
15	Project Name	HOME ADMIN
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Affordable Housing Development & Preservation
	Needs Addressed	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Infill development
	Funding	HOME: \$146,536
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	
	Planned Activities	
16	Project Name	TBRA (TENANT BASED RENTAL ASSISTANCE)
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Affordable Housing Development & Preservation
	Needs Addressed	Housing stabilization funds
	Funding	HOME: \$167,500
	Description	

	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	At least 50 homeless households.
	Location Description	City of Worcester.
	Planned Activities	Rental Assistance of up to 24 months for each household.
17	Project Name	GREEN ISLAND PROJECTS
	Target Area	Low-Moderate Income Census Tracts
	Goals Supported	Neighborhood Stabilization & Revitalization
	Needs Addressed	Development of new affordable housing Development of new mixed-income housing Rehabilitation of existing housing stock Housing maintenance services Housing repair services Assistance for first time homebuyers Systematic housing inspections Housing contaminant and pest abatement Elimination of area and spot blight Infill development New streets and sidewalks Small business assistance Recreational and community facilities Economic development loans and capital Small business and storefront improvements Technical assistance to small businesses Revitalization of neighborhoods Neighborhood public safety improvements
	Funding	CDBG: \$500,000
	Description	
	Target Date	6/30/2020
	Estimate the number and type of families that will benefit from the proposed activities	
	Location Description	

	Planned Activities	
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AP-50 Geographic Distribution – 91.220(f)

Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed

The City of Worcester is comprised of 44 U.S. Census tracts, of which 26 tracts had 51.0% or more of their populations being persons of Low-Moderate Income (LMI) - defined by HUD as households whose incomes were 80% or less of the metropolitan area median income as adjusted for family size. These 26 LMI tracts are: 7304.01, 7304.02; 7305.00; 7310.02; 7311.01, 7311.02, 7312.03, 7312.04, 7313.00, 7314.00, 7315.00, 7316.00, 7317.00, 7318.00, 7319.00, 7320.01, 7322.01, 7322.02; 7322.03, 7323.02, 7324.00, 7325.00, 7326.00, 7327.00, 7329.02, and 7330.00. (see attached 2015 Low Income Population City of Worcester Map for locations). An examination of the attached Demographic Analysis of Target Areas Tables show that these 26 LMI tracts has a greater proportion of the city's racial and ethnic minority populations. According to the latest U.S. Census estimates (from 2017), the citywide percentages by racial and ethnic populations were: 57.1% White, non-Hispanic, 20.9% Hispanic, 11.8% Black/African American, non-Hispanic, 7.3% Asian, non-Hispanic, 2.3% multi-race, non-Hispanic, 0.4% all other single races. In comparison within these 26 tracts with majority Low-Moderate Income populations, the latest U.S. Census estimates (from 2017) reported the following percentages by racial and ethnic populations: 45.5% White, non-Hispanic, 29.4% Hispanic, 13.3% Black/African American, non-Hispanic, 8.5% Asian, non-Hispanic, 2.3% multi-race, non-Hispanic, 0.4% all other single races.

One of these tracts, 7324.00, was ranked as the city's most distressed and the sixth most distressed in the State with high levels of poverty, crime, problems with idle youth including gangs and drugs, foreclosed properties, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. This tract (7324.00) is the focus of the Union Hill Neighborhood Revitalization Initiative which continues to work across multiple City departments in concert with key community institutions and stakeholders to improve the quality of life in that area.

Another of these tracts, 7325.00, was ranked as one of the top 5 of the city's most distressed and the with high levels of poverty, crime, problems with idle youth including gangs and drugs, foreclosed properties, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. This tract (7325.00) is the focus of the Green Island neighborhood which will work across multiple City departments in concert with key community institutions and stakeholders to improve the quality of life in that area.

The city's focus on targeted, strategic neighborhood development and revitalization is exemplified by the targeting of allocations to programs that serve Low-Moderate Income census tracts particularly in the Union Hill and Green Island neighborhoods. Overall 97% non-administrative, Fifth Year Annual Action Plan (7/1/19 – 6/30/20) funds are targeted to activities located or that serve the above reported 26 LMI Census Tracts, while 14% of allocated funds will directly serve the Green Island neighborhood.

Target Area	Percentage of Funds
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Target Area	Percentage of Funds
Low-Moderate Income Census Tracts	97
Union Hill Target Area	11
Green Island Target Area	24

Table 9 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Beginning in 2014, the city of Worcester embarked on the development and implementation of a new Five (5) Year Consolidated Plan (2015-2020). In order to establish an updated baseline of community needs for the Consolidated Plan, the city sponsored an extensive public outreach effort in 2014 and 2015, holding a series of eight (8) community needs assessment meetings in various neighborhoods throughout the city, with at least one in each of the city council districts. The meetings were attended by over 110 total participants. This neighborhood outreach was complimented by various individual and group consultations with numerous housing, human, and social service providers in the areas of homelessness, public housing, and services for special needs and low-income populations.

The Five (5) Year Consolidated Plan and the subsequent annual action plans helped to inform the proposed fifth year (2019-2020) annual action plan outreach/funding recommendation process. In addition, after the announcement of the availability of Request for Proposals (RFP) for fifth year action plan funding through CDBG, HOPWA, and ESG, a Community Needs Public Hearing was held on January 17, 2019 at City Hall to review and assess updated needs information received through workshops and any additional community input.

The Community Development Advisory Committee (CDAC), has traditionally served as the formal citizen body that provides input on funding applications submitted as part of the city's CDBG RFP process. The CDAC is a citizen advisory committee comprised of ten members, with two from each of Worcester's five council districts. This year, the CDAC met seven times from October 2018 through March 2019 to review and evaluate the CDBG proposals and listen to presentations and ask questions of all of the Public Services, Public Facilities and Improvements, and City Interdepartmental applicants that submitted proposals in response to the RFP.

While the CDAC issues initial advisory recommendations on funding allocations, it is the city administration, through the city manager, that ultimately recommends which CDBG projects and activities to fund which form the basis of the annual action plan.

HOPWA proposals were vetted by the city administration together with the HOPWA Advisory Committee. This committee is composed of experts in community health and the HIV/AIDS field in Worcester County and Connecticut. The process was similar to CDAC in its review, including holding a public meeting to introduce the HOPWA process and guidelines, a technical assistance meeting for interested applicants, and a review and ranking session held in public at City Hall.

ESG proposals were vetted by an ESG RFP Review Committee that was comprised of members of the Worcester City and County Continuum of Care (CoC), and local funders of such social services such as the United Way. The ESG RFP Review Committee also followed a similar process to the CDAC in its review, including holding a public meeting to introduce the ESG process and guidelines, a technical assistance meeting for interested applicants, and an RFP review and ranking session at City Hall.

Discussion

As discussed above, 97% non-administrative, Fifth Year Annual Action Plan (7/1/19 – 6/30/20) funds are targeted to activities located or that serve the above reported 26 LMI Census Tracts, while 11% and 24% of allocated funds will directly serve the Union Hill and Green Island Target Areas respectively.

In an effort to address public facilities goals contained in the 2015-2020 Consolidated Plan \$500,000 in CDBG funds have been allocated in the Fifth Year Action Plan to improve streets, sidewalks, and other forms of eligible public infrastructure within the Green Island neighborhood (in tandem with improvements made by other city departments, public and private partners. Likewise, \$350,000 in CDBG funds has been allocated to the Neighborhood Development Fund which will also be used to improve streets, sidewalks, sewers, and other forms of eligible public infrastructure. Both of the allocations will benefit low- and moderate-income persons and communities.

All CDBG funded public service activities operate out of facilities that are located within and have the vast majority of the clients that they serve come from the Low-Moderate Income Census Tracts.

Beneficiaries to be served through two public facilities improvement projects to be funded through CDBG during the Fifth Year Action plan are: Veterans Inc. Transitional Housing Upgrade and YWCA of Central Massachusetts ADA Bathroom Upgrades.

CDBG funded economic development activities will be used for façade improvement and microloan programs that support small business growth and aesthetic improvements to key corridors in distressed areas and retain existing jobs and create new jobs.

During 2019-2020, the city will fund 5 programs through 4 HOPWA Eligible Metropolitan Statistical Area non-profits (3 in Worcester County and 1 in Windham County, CT), providing services and housing that will help over 125 individuals and families obtain and maintain stable housing.

During 2018-2019, the city will 7 programs through 6 entities through the Emergency Solutions Grant (ESG) that will provide services, shelter, and sustenance to over 400 persons (both individuals or those within families), including veterans, youth, formerly incarcerated, those fleeing domestic violence, unsheltered homeless, and those exiting the Triage & Assessment Center for permanent housing.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The City of Worcester will directly support households with rental assistance, production of new units, rehabilitation of existing units, and acquisition of existing units through the following goals:

- Goal 1 Affordable Housing Development & Preservation,
- Goal 8 Resolve Barriers to Housing for Homeless Persons, and
- Goal 9 Housing Opportunities for Persons with HIV/AIDS.

Below is the summary breakdown of the support provided from the above goals.

One Year Goals for the Number of Households to be Supported	
Homeless	68
Non-Homeless	115
Special-Needs	0
Total	183

Table 10 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	118
The Production of New Units	3
Rehab of Existing Units	47
Acquisition of Existing Units	15
Total	183

Table 11 - One Year Goals for Affordable Housing by Support Type

Discussion

While it is estimated that nearly 500 homeless individuals will be served with ESG dollars between Emergency Shelter, Street Outreach, Homeless Prevention and Rapid Rehousing, the above number includes only those who will be supported by a direct rental assistance subsidy through ESG.

The Special-Needs Line item reflects individuals served with subsidies through HOPWA’s STRMU/PHP and TBRA projects, as well as units supported with HIV/AIDS Housing Operations projects.

AP-60 Public Housing – 91.220(h)

Introduction

The Worcester Housing Authority's (WHA) mission is to enhance the Worcester community by creating and sustaining decent, safe, and affordable housing that champions stability and self-sufficiency for our residents.

WHA is an autonomous corporation which is allowed to act as a municipal entity and participate in municipal benefits.

The City's Executive Office of Economic Development's Housing Development Division and the WHA operate independently, and therefore the Housing Development Division's direct role in providing public housing is limited.

Actions planned during the next year to address the needs to public housing

Clearly the most difficult issue facing low income households in Worcester is the availability of affordable housing options currently almost 40% of mobile voucher holders are requesting extensions to identify an eligible unit.

The WHA's strategy with regard to its public housing inventory is to:

- Continue to maintain a 98% or higher monthly occupancy rate agency wide;
- · Decrease unit turnover time in an effort to house families more efficiently;
- · Monitor the opening and closing of its waiting lists to ensure that applicants' wait time is reduced to as short as possible;
- · Increase the number of private landlords who participate in the Section 8 Housing Choice Voucher program;
- · Continue its rigorous screening of applicants to ensure that landlords are renting to qualified candidates, increasing the desirability of the Housing Choice Voucher program;
- Apply for additional HCV should they become available.

Actions to encourage public housing residents to become more involved in management and participate in homeownership

The Worcester Housing Authority has developed a program to help residents become self-sufficient. Our program is called "A Better Life" (ABL). This program offers interested applicants a faster means to secure an apartment for their family compared to the standard waiting time for a public housing apartment. In return, the applicant agrees to do those things necessary to provide their family with a better life. WHA will work with them every step of the way. The program is mandatory for state public housing residents but voluntary for federal housing residents.

The ABL program continues to have a tremendous impact with the residents participating in this program. Participants continue to make significant improvements with their education, employment and finances.

Zero Evictions - Since the work/school requirement was implemented in May 2015, not a single family has lost their housing assistance due to this requirement.

Substantial increase in number of residents employed - Of the 216 clients, only 37% were employed when they enrolled in ABL. Currently, 60% are employed. An increase of 62%. Of the clients that have been enrolled for 24 months, 71% are now employed. That's an increase of 92%.

Increase in annual earnings - Clients have seen an overall increase of 76% with their gross annual income. Additionally, clients enrolled for 24 months, have collectively more than doubled their annual earnings since when they enrolled in ABL.

Completion of educational programs - Active and former ABL clients have completed an astounding 106 educational programs including 57 Certifications, 12 Associate Degrees and 5 Bachelor Degrees.

Decrease in personal debt - Overall, debt has been reduced by 30% among all clients. Clients that have graduated the program significantly reduced their debt by 75%.

ABL and Family Self Sufficiency participants are also able to access the Home Ownership Through Public Housing Assistance ("HOT-PHA"), will use Neighborhood Assistance Corporation of America's ("NACA") counseling and mortgage program in conjunction with the Section 8 vouchers and/or the FSS program. NACA's existing homeownership programs are designed to help low- and moderate-income individuals achieve homeownership, and NACA's programs have already achieved tremendous success.

In February 2015, the WHA launched its ambitious A Better Life's (ABL) employment readiness program with the goal of partnering with local employers willing and committed to hiring prescreened/pre-qualified candidates that are enrolled in the ABL program. ABL is an aggressive program for clients with access to resources aimed to promote self-sufficiency.

In just over 2 years, over 119 private sector employers have committed to hiring our ABL candidates. Focusing on industries such as healthcare, manufacturing, retail, and hospitality, over 109 candidates have been hired through our employer partners. ABL has expanded its partnerships by implementing on-site on the job training program exposure for candidates. With a retention rate of over 75%, the ABL employment readiness programs are proof that our candidates have the skills, qualifications and motivation to succeed in the workforce.

The WHA has long realized that a portion of its success is dependent upon the satisfaction of its residents. Continuing on a long standing tradition of fostering partnerships, building resident leadership opportunities, WHA supports 13 formally recognized tenant organizations and they are the conduit

through which ideas and issues are presented to the WHA administration. In turn the administration facilitates through the organizations new policy, operational and program changes and enhancements to the residents.

If the PHA is designated as troubled, describe the manner in which financial assistance will be provided or other assistance

n/a

Discussion

Additionally, a WHA Resident Advisory Board meets monthly with the Executive Director to discuss, in addition to policy, operational and programming, other areas that have a direct effect on the people it serves.

AP-65 Homeless and Other Special Needs Activities – 91.220(i)

Introduction

The City's Plan to Address Homelessness strives to expand on the successful “housing-first” model which moves away from extensive and costly shelter stays to focus on homelessness prevention to stabilize individual adults, families, youth and young adults experiencing housing instability. The City’s ultimate goal is to quickly stabilize those in our community who are homeless or at-risk of homelessness so they can ultimately obtain safe and affordable permanent housing. The City recognizes the need to develop units for individuals and families through innovative strategies including rehabilitating existing housing stock, furthering homelessness prevention efforts, and improving the delivery of comprehensive service strategies that address the health, employment, and long term self-sufficiency skills targeted to specific populations struggling with homelessness and other special needs.

Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including

Reaching out to homeless persons (especially unsheltered persons) and assessing their individual needs

The City continues its current strategies in reaching out to shelter and unsheltered homeless persons and assessing their individual needs. This action is associated with Action Plan Goal 8: Resolve Barriers to Housing for Homeless Persons. City ESG funds will support the salary and fringe for an Outreach Case Manager to conduct assessment of individual needs and enable access to mainstream resources and housing referrals for households without children that are unsheltered. In one year, it is expected that the outreach case manager will engage with about 100 literally homeless individuals and unsheltered couple households). The Outreach Worker, an employee of the City of Worcester’s Department of Health & Human Services, will work closely with the City of Worcester Quality of Life Task Force, the Worcester Police Department’s Crisis Intervention Team, and other local outreach players in collaboration with the Worcester City and County Continuum of Care’s Coordinated Entry System.

In addition to ESG Outreach, there are homeless outreach services in the City to identify and engage with such individuals/families that offer immediate and long-term assistance to unsheltered persons by frequenting locations such as the downtown corridor of Union Station, the Public Library, parks and roadways prone to panhandling and loitering, soup kitchens, and food pantries. The goal is to engage with people over time and, through an outreach presence and relationship, connect those who typically refuse services to resources such as housing case management, substance abuse treatment and benefit assistance. Now in its second-year as an outreach team, it is support by the South Middlesex Opportunity Council (SMOC), the agency that operates the Triage & Assessment Center. This additional staff helps to facilitate referrals to the Triage & Assessment Center and ultimately, permanent housing solutions. Community outreach organizations engage with partners and stakeholders to create a holistic system of outreach, engaging with hospitals, law enforcement, detox centers, and other services that

may commonly encounter homeless individuals.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City plans to address emergency shelter and transitional shelter needs for the homeless are encompassed in Strategic Plan Goal 8: Resolve Barriers to Housing for Homeless Persons, and Goal 9: Housing Opportunities for People Living with HIV/AIDS. These actions will be supported by both ESG and HOPWA funds through the following activities.

Hotel Grace, run by the Net of Compassion, takes action when temperatures drop, they work extra hard to make sure our neighbors experiencing homelessness are safe, warm, and dry. As the City expands our efforts to build on the housing first model this seasonal shelter warming space works with community partners to support basic safe shelter for those who need it during cold weather months when our other services providers are over capacity.

(ESG) Emergency Shelter provides Emergency Shelter Essential Services for unaccompanied homeless adults at the Triage & Assessment Center, the Bridge of Central Mass and for Veterans through a veterans-specific emergency shelter project. HOPWA funds provide supportive services that may assist individuals living with HIV/AIDS in connecting, as determined by individual needs, to emergency shelter and transitional housing through Coordinated Entry and Access systems in both Worcester County and Windham County, CT.

All of these activities help address the emergency shelter and transitional housing needs of homeless populations because of the crisis-intervention nature of the program support. These programs recognize that permanent housing is the ultimate goal, but some populations that are particularly at-risk may need enhanced stabilization and case management.

Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again

Helping homeless persons, including chronically homeless, individuals, families with children, veteran with their families, and unaccompanied youth make the transition to permanent housing and independent living, and ensuring that households do not return to homelessness are priority needs identified in Goal 8: Resolve Barriers to Housing for Homeless Persons and Goal 9: Housing Opportunities for People Living with HIV/AIDS of the Strategic Plan. One-year goals to address this priority area focus on the housing facility and supportive service needs to transition to permanent housing, thanks to the expertise of sub-recipient agencies responsible for carrying out permanent

housing placement and rapid re-housing activities. For example, all of the financial assistance for housing that the City provides through ESG and HOPWA also ensures a supportive service match that leads households to self-sufficiency during the process of Rapid Re-Housing. The Coordinated Entry & Assessment process through the Continuum of Care ensures that housing placements are made with the appropriate supportive services using Continuum of Care and other mainstream resources targeted to disabled and/or chronically homeless households.

ESG Rapid Re-Housing provides funding towards unaccompanied adults to support first and last months' rent and short-to-medium-term rental assistance, depending on individual needs. To support the housing needs of unaccompanied young adults, ESG Rapid Re-housing funds support first and last months' rent, short-to-medium-term rental assistance and other financial assistance related to rehousing young adults ages 18-24 years.

HOPWA funds focus on stabilization in the transition to permanent housing by providing supportive services through case management and permanent housing placement for rapid re-housing. HOPWA supports Tenant-Based Rental Assistance which focuses on the attainment of permanent housing through mobile vouchers. Additional permanent housing is available through facility-based permanent supportive housing programs and Permanent Housing Placement rental start-up assistance.

Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.

Needs associated with preventing homelessness for all populations City-wide are addressed through Strategic Plan Goal 7: Expand Resources for Homeless Prevention. This focus will include housing stabilization case management for some and actual cash assistance for limited utility and rent payments depending on specific household needs (or a combination of both, as assessed by housing providers). The commitment of the actions is supported by HOPWA Short-term Rent, Mortgage, and Utility assistance (STRMU) for over 75 low-income households with a family member or individual that is HIV-positive. Housing stabilization needs including referrals, services for special needs and disabled households, skills training, and planning for individuals discharged from publicly funded institutions. These goals are accomplished widely through community partnerships brokered between agencies and in collaboration with the City.

ESG funds for housing stabilization case management for homeless and formerly homeless individuals will accomplish the needs and goals identified for year three. Institutional delivery of services that address housing, health, social services, employment, education, as well as youth needs are also facilitated through coordination and in coalition with City departments and initiatives.

Discussion

In addition to addressing the problems associated with homelessness, the City plans to address the housing and supportive services needs of persons who are not homeless but have other special needs. Stakeholders from mental health and physical health institutions, elder care organizations and refugee resettlement/immigration service organizations are made aware of supportive services and supportive housing resources available through the Coordinated Assessment and Entry process facilitated by the Continuum of Care (CoC). Additionally, these entities are at the table when discussing Housing and Homelessness Benefits (HHB) at the monthly HHB meetings facilitated by the CoC Lead Agency. This monthly forum is attended by front line service providers, concerned citizens, current and former recipients of services, affordable housing providers and others, to spread awareness and foster connections for supportive services and special needs providers.

The City of Worcester and the CoC also have a seat at the Community Roundtable on Youth Homelessness, which includes over 25 multi-sector children and youth-serving agencies. One key goal of the roundtable is to reduce youth homelessness by assuring appropriate discharges and transitional care for youth transitioning from the Massachusetts Foster Care system. The group also includes representation from the State Department of Children and Families and the Worcester Public Schools.

Task Force for Sustaining Housing First Solutions; The City Manager's Task Force for Sustaining Housing First Solutions has undertaken an in-depth examination of Worcester's community needs and resources in addressing adult chronic homelessness from March to June 2018; ultimately developing a plan to employ the actions and resources necessary to sustain a long-term system of permanent supportive housing within the City of Worcester. Three committees are tasked with the gathering of specific information regarding data, affordable housing, case management and supportive services; providing detailed, actionable recommendations to the City Manager on each key element towards implementation. The Executive Director of the U.S. Interagency Council on Homelessness has developed and launched the first ever federal strategic plan to end homelessness; she's implemented the plan and executed the strategies that have achieved significant measurable results.

Assessing & Addressing Acute Risk Behaviors; The City of Worcester is pleased to introduce a new initiative called the Hub. The Hub is a strategic program that combines the efforts of more than 30 local and state organizations to assess and address acute risk behaviors and cases including drug and opioid abuse, chronic homelessness, mental health issues, poverty and crime. The Hub is a coordinated mobilization of resources to address individuals or families facing acute levels of elevated risk. The purpose is to lower risk and connect individuals or families to services immediately. This Hub table will be overseen by a Systems Leader Group (SLG) that will be updated by the Hub on any systemic issues the table is seeing. This SLG will look into the data and trends to try to identify opportunities for systemic change.

Finally, the City of Worcester Department of Health & Human Services provides coordination and management of the City's critical services in the areas of Public Health, Veterans' Services, Human Rights

and Disabilities, Elder Affairs and Youth Services. Access to these programs and services associated with persons with special needs are streamlined through this City department by providing information, outreach and educational programs for all Worcester residents regardless of age, race, ability or health condition.

AP-70 HOPWA Goals– 91.220 (I)(3)

One year goals for the number of households to be provided housing through the use of HOPWA for:	
Short-term rent, mortgage, and utility assistance to prevent homelessness of the individual or family	85
Tenant-based rental assistance	9
Units provided in permanent housing facilities developed, leased, or operated with HOPWA funds	30
Units provided in transitional short-term housing facilities developed, leased, or operated with HOPWA funds	0
Total	124

AP-75 Barriers to affordable housing – 91.220(j)

Introduction:

Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment

The following actions will be addressed in year one of the Consolidated Plan to overcome impediments identified in the Analysis of Impediments to Fair Housing:

Rental Occupancy Practices

Increase coordination among those City officials working in housing policy and development and those working on human rights and disability issues. Continued and renewed efforts to build partnerships and increase communications and connections among City policy makers, advocates and community groups will help to further the success of these initiatives. As a result of the Consolidated Planning process more coordination among City Departments has occurred on a number of cross cutting issues including housing policy and development.

Mortgage Lending and Foreclosure

Continue to coordinate with organizations that provide education, counseling and assistance to homebuyers and homeowners to promote successful homeownership. For the Action Plan this is addressed in goals and objectives by Goal 1, which includes a project for homebuyer assistance to be funded this year.

Affordable Housing Distribution

Promote mixed-income housing and mixed-income neighborhoods, including encouraging market-rate development in low-income areas and creating and preserving affordable housing units in areas of the city where they are currently scarce – particularly where strong neighborhood amenities are available such as schools, parks and shopping. For the Action Plan this is addressed in goals and objectives by Goal 1, which includes many projects to be funded this year.

Housing Cost Burdens

Continue to support the capacity of affordable housing developers who can bring in federal resources or creatively leverage other resources to increase the regional supply of affordable housing. For the Action

Plan this is addressed in goals and objectives by Goal 1, which includes many projects to be funded this year.

In an ongoing effort to reduce zoning barriers that may inhibit affordable housing development, the City of Worcester's Adaptive Reuse Overlay District encourages the reuse of underutilized buildings and land throughout the city. The city's four recently adopted Parking Overlay Districts also encourage the rehabilitation of buildings in some of the city's most vibrant and historically rich neighborhoods by removing off-street parking requirements, thereby decreasing demand for surface parking and removing a regulatory barrier for the redevelopment of these buildings into a variety of uses (e.g., housing, restaurant, retail). Finally, the disposition through thoughtful request for proposals (RFP) processes has resulted in the redevelopment of previously city-owned property into market rate housing. The following developments which include a balanced mix of proposed market rate and affordable units were facilitated or have been proposed through the use of these tools:

Adaptive Reuse Overlay Districts:

1151-54 Main Street - former textile factory into 109 housing units (market rate)

64-79 Beacon Street - former Junction Shops into 181 housing units

93 Grand Street – former Crompton & Knowles Mill into 64 housing units (mixed rate)

95-97 Gates Street – manufacturing building in to 37 housing units (market rate)

Parking Overlay Districts:

48 Water Street – former Chevalier Furniture building into 64 units (mixed income)

Land Use Disposition of City-owned properties for redevelopment:

28 Adams Street – former Adams Street School house into 28 units (market rate)

34 Grove Street – former vocational school into 84 units (mixed income)

Discussion:

AP-85 Other Actions – 91.220(k)

Introduction:

Actions planned to address obstacles to meeting underserved needs

Challenges to meeting underserved needs in the coming year stem primarily from increasing demand for program activities combined with decreasing amounts of funding. In order to maximize efficiency and achieve a greater impact, the City proposes the following actions:

- Annually, EOED conducts funding overview and technical assistance workshops for parties interested in applying for HUD entitlement funds through CDBG, HOPWA, and ESG, (usually planned for November). The workshops are designed to focus and facilitate discussion with interested parties in order to define the key social service issues and community needs in Worcester, to identify gaps in service, and to brainstorm potential strategies to address needs and gaps. The workshops were also designed to foster dialogue among agencies/departments to enhance collaboration and the sharing of information.
- Continue to work to improving access to services by persons with limited English proficiency in order to reach underserved populations. According to recent U.S. Census American Community Survey data, 18 percent of the Worcester population speaks a language other than English and speaks English less than “very well.” It is therefore important to ensure that critical programs and services address language and cultural barriers that isolate households and impede successful utilization of community resources. This proposed action includes developing a Language Assistance Plan for HUD Entitlement Programs.

Actions planned to foster and maintain affordable housing

The City will foster the rehabilitation of both rental and owner housing units, as these efforts keep people in affordable housing and may serve to prevent homelessness, especially for extremely low-income and elderly homeowners. The City also prioritizes homeless activities, ranging from the provision of emergency shelter to supportive services that prevent homelessness. Overall, the City will focus on multiple efforts to foster and maintain affordable housing, including rental assistance, rental acquisition and rehabilitation, new rental construction, owner occupied rehabilitation, and down payment assistance for first-time buyers.

Actions planned to reduce lead-based paint hazards

The Worcester Lead Abatement Program was awarded a \$3.714 million Lead Hazard Reduction Demonstration Grant from the HUD Office of Healthy Homes in 2015 for the lead paint and soil abatement of low income and very low income housing units, as well as the provision of primary prevention services in the form of outreach and education to low- and moderate-income families with children under age six. The City plans to continue these efforts through subsequent rounds of HUD

Healthy Homes funding, and anticipates addressing lead-based paint hazards in 70 housing units over the next year.

The City's Housing Development Division (HDD) administers the Worcester Lead Abatement program that can provide up to \$10,000 per unit to assist with lead abatement in approved properties with low-to moderate-income tenants. HDD also coordinates the Massachusetts "Get the Lead Out" loan program funded by MassHousing for additional abatement assistance over the \$10,000 per unit threshold. In addition, any CDBG funded housing rehabilitation project over \$25,000 will be deleted in conjunction with the rehabilitation activities to take place. For projects between \$5,000 and \$24,999, a lead report will be obtained prior to rehabilitation work taking place.

Actions planned to reduce the number of poverty-level families

Given the high proportion of residents living in poverty, the City focuses on using its HUD entitlement program funds for initiatives and projects that provide the maximum benefit to very low, low and moderate income individuals and households. The City's anti-poverty strategy seeks to support programs that provide job and life skills training and other advancement opportunities, and is part of a coordinated effort to create jobs and improve the local economy. This two-pronged approach helps families achieve and maintain economic security and self-sufficiency. In addition, EOED will continue coordinating with the Central Massachusetts Workforce Investment Board (CMWIB) around programs and initiatives that support the City's goal of reducing poverty.

Actions planned to develop institutional structure

Coordinated Entry for Homeless Persons is convened by the Central Massachusetts Housing Alliance, Inc. (CMHA), the lead agency for the Continuum of Care (CoC) in partnership with the City of Worcester and CoC agencies. The purpose of the Coordinated Entry system is to improve the quality of the CoC and greater Worcester's homeless housing and service system, and to improve outcomes for individuals and families in the continuum that are threatened with or experiencing homelessness. Two Work Groups convene bi-weekly to develop the coordinated entry policy, with one group focused on the needs of homeless families and the other on homeless individuals (including veterans and their families, and unaccompanied youth). The work groups implement processes that prioritize individuals and families with the greatest needs (especially chronically homeless households) for housing and service assistance, and attempt to minimize barriers to entry because of lack of employment or income, drug or alcohol use, or having a criminal record. The City and the CoC encourage a Housing First model, but recognize that some housing and service resources are required by funding agencies or providers to give preferences to certain populations including sub-groups determined by age, disability, gender, or community problem.

The Coordinated Entry system ensures appropriate access to housing based on individual needs and assessments, and promotes effective referrals and partnerships throughout the homeless services system.

Community partners at the heart of the overall institutional structure, including those that serve homeless and non-homeless populations, have cited gaps in the coordination, collaboration, and information sharing among organizations responsible for program delivery. In particular, the consultation process highlighted a need to increase awareness of existing resources amongst organizations. This gap impacts the referral system for clients, and consequently affects the ability of low- and moderate income residents to access other critical resources in the community. As a result, the City will support information and referral and direct case management services that help connect low- and moderate-income residents to much needed social and human services.

Actions planned to develop institutional structure

- Coordinated Entry for Homeless Persons is convened by the Central Massachusetts Housing Alliance, Inc. (CMHA), the lead agency for the Continuum of Care (CoC) in partnership with the City of Worcester and CoC agencies. The purpose of the Coordinated Entry system is to improve the quality of the CoC and greater Worcester's homeless housing and service system, and to improve outcomes for individuals and families in the continuum that are threatened with or experiencing homelessness. Two Work Groups convene bi-weekly to develop the coordinated entry policy, with one group focused on the needs of homeless families and the other on homeless individuals (including veterans and their families, and unaccompanied youth). The work groups implement processes that prioritize individuals and families with the greatest needs (especially chronically homeless households) for housing and service assistance, and attempt to minimize barriers to entry because of lack of employment or income, drug or alcohol use, or having a criminal record. The City and the CoC encourage a Housing First model, but recognize that some housing and service resources are required by funding agencies or providers to give preferences to certain populations including sub-groups determined by age, disability, gender, or community problem.
- The Coordinated Entry system ensures appropriate access to housing based on individual needs and assessments, and promotes effective referrals and partnerships throughout the homeless services system.
- Community partners at the heart of the overall institutional structure, including those that serve homeless and non-homeless populations, have cited gaps in the coordination, collaboration, and information sharing among organizations responsible for program delivery. In particular, the consultation process highlighted a need to increase awareness of existing resources among the organizations. This gap impacts the referral system for clients, and consequently affects the ability of low- and moderate income residents to access other critical resources in the community. As a result, the City will support information and referral and direct case management services that help connect low- and moderate-income residents to much needed social and human services.

Actions planned to enhance coordination between public and private housing and social service agencies

A number of local and regional agencies, non-profit organizations, and service providers engaged in the consultative process that informs this Action Plan. EOED will capitalize on these relationships to enhance coordination, as well as continue to work collaboratively with various municipal departments to maximize the use of limited resources to address the needs of low- and moderate-income residents. In addition, the City will continue to actively participate in ongoing efforts to enhance coordination with private industry, businesses, developers, and social service agencies in order to foster economic development. EOED, for example, plays a leadership role in the Worcester Business Resource Alliance (WBRA), a centralized network of business professionals, technical assistance providers, lenders, and community development organizations that collectively provide services to entrepreneurs and small business owners and managers.

Discussion:

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant (CDBG) allocations to fund Fifth Year Action Plan (7/1/19 - 6/30/20) activities contained within this document include \$4,382,360 in U.S. Department of Housing and Urban Development (HUD) Fiscal Year 2019 CDBG Entitlement Funds for the City of Worcester (Grant # B-19-MC-25-0026), \$50,000 in CDBG anticipated program income generated from prior years activities, and \$1,608,631 in CDBG unexpended balances from prior year allocations. Thus a total of \$6,040,991 in CDBG funds will be available and has been allocated for Fifth Year Action Plan Activities (7/1/19 - 6/30/20) as presented in Tables AP-20 (Annual Goals and Objectives) and AP-38

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

- | | |
|---|----------|
| 1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed | \$50,000 |
| 2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan | |
| 3. The amount of surplus funds from urban renewal settlements | |
| 4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan. | |
| 5. The amount of income from float-funded activities | |
| Total Program Income | \$50,000 |

Other CDBG Requirements

1. The amount of urgent need activities

HOME Investment Partnership Program (HOME) Reference 24 CFR 91.220(I)(2)

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:
2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows: The City is not currently using HOME

Investment Partnership Program funds for homebuyer assistance activities. In the event of resale of a property where there is not a direct subsidy to the homebuyer, the City uses a Resale Provision to preserve the remaining affordability period to ensure the housing is retained for occupancy for low-income households. The Resale Provision requires that if the owner of an income restricted property sells, conveys, or transfers his/her ownership interest in the property prior to the end of the minimum federally-required affordability period, the sale, conveyance, or transfer shall only be to an eligible, income-qualified purchaser. Other restrictions concerning notice of sale, maximum resale price, and marketing of affordable unit(s) shall apply and are fully retained in the City's Resale Provision.

3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:

The purchaser must occupy the property as his/her principal residence throughout the period of affordability. For projects that are subject to a recapture provision, the period of affordability is determined by the amount of the amount of direct subsidy (defined below) to the homebuyer, as follows:

5 years for individual projects receiving between \$1,000 and \$14,999 in Housing Fund assistance per unit; and

10 years for individual project receiving between \$15,000 and \$40,000 in Housing Fund assistance per unit; and

15 years for individual project receiving more than \$40,000 in Housing Fund assistance per unit.

While long-term affordability can be accomplished through either recapture or resale provisions, the City has elected to impose recapture provisions on all HOME-assisted homeownership projects.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows: *The City of Worcester does not currently intend to use HOME funds to refinance existing debt currently secured with HOME funds.*

**Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)**

1. Include written standards for providing ESG assistance (may include as attachment)

Written standards are provided as an attachment to this plan.

2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.

Coordinated Entry for Homeless Persons is convened by the Central Massachusetts Housing Alliance, Inc. (CMHA), the lead agency for the Continuum of Care (CoC) in partnership with the City of Worcester and CoC agencies. The purpose of Coordinated Entry is to improve the quality of the CoC and greater Worcester's homeless housing and service system, and to improve outcomes for individuals and families in the continuum that are threatened with or experiencing homelessness. Two Work Groups convene bi-weekly to develop the coordinated entry policy, with one group focused on the needs of homeless families and the other on homeless individuals (including veterans and their families, and unaccompanied youth). The work groups implement processes that prioritize individuals and families with the greatest needs (especially chronically homeless households) for housing and service assistance, and attempt to identify and minimize barriers to entry including lack of employment or income, drug or alcohol use, or criminal record. The City and the CoC encourage a Housing First model, but recognize that some housing and service providers give preference to certain populations based upon age, disability status or gender.

The Coordinated Entry system ensures appropriate access to housing based on individual needs and assessments, and promotes effective referrals and partnerships throughout the homeless services system.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

Please see attached the Fiscal Year 2018-2019 Emergency Solutions Grant Program - Request for Proposals, which explains the process for making sub-awards and how funds are allocated to private nonprofit organizations. The City allocates and administers ESG funds to private nonprofit agencies via executed contracts, as recommended by the Emergency Solutions Grant Advisory Committee, the Continuum of Care, and as approved by the City Manager and City Council of Worcester.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions

regarding facilities and services funded under ESG.

The City has a homeless or formerly homeless person serving as a voting member on the Emergency Solutions Grant Advisory Committee. Additionally, members of the CoC Board and diverse funding partners with knowledge of existing needs and resources in the community, such as the United Way, contribute to recommendations for making sub-awards for ESG. This year, direct service providers also participated as committee members to share insight into how ESG-funded projects are working on a practical level. In the past 5 years, ESG funds have been used for prevention, rapid-rehousing, street outreach and emergency shelter operations to serve major sub-populations represented in our community. The decision to allocate funds to these activities is greatly informed by the gaps and resources currently available through the federal HEARTH act in consultation with the CoC Board, and further informed by “on-the-ground” feedback in regards to how certain programs are filling service gaps in the community.

The CoC Board is staffed according to HUD’s requirements, including: broad geographical representation, formerly homeless individuals, the City of Worcester as ESG recipient agency, veterans services, homeless assistance providers, mental health providers, social service providers, victims services providers, faith-based organizations, hospitals, higher education, government, and the public housing authority. The role of this entity is as follows:

- Identifies emerging or changing needs among homeless individuals and families and recommends new resources to best address those needs
- Implements and supports policies that ensure the best use of available resources for the homeless population through a coordinated assessment and entry system
- Makes decisions on applications for new and/or renewed project funding based on a specific set of review criteria including monitoring and evaluation of specific program performance and documentation of an effective and transparent prioritization of resources to those with the greatest need.

The CoC Board’s input, based on its characteristics highlighted above, is considered significantly in the ESG funding recommendation process.

Based on feedback from this year’s funding recommendation process, the ESG grant administrator plans to update the scoring and ranking process to make it more intuitive and straightforward, encouraging participation by individuals and residents who don’t have extensive experience reading through grant proposals, but have valuable insight into the service system in Worcester. Voices of direct service providers this year have proven valuable to the process, and a simplification of the process will facilitate more representative input from the community.

5. Describe performance standards for evaluating ESG.

As part of the process of allocating ESG funds through the City’s RFP process, there are established

performance standards to evaluate ESG program subrecipients. Under the “Project Narrative & Description” section, subrecipients provide a method for tracking clients that can be measured through recording individual client or household-level data. Subrecipients predict the unduplicated number of families/persons that will benefit from the activity (output) and the cost to provide the service. Desk monitoring occurs with every payment request submission.

On a quarterly basis, ESG subrecipients submit HMIS-generated Performance Reports to measure progress alongside financial drawdowns for each project.

Fifth Year Action Plan

(July 1st, 2019—June 30th, 2020)

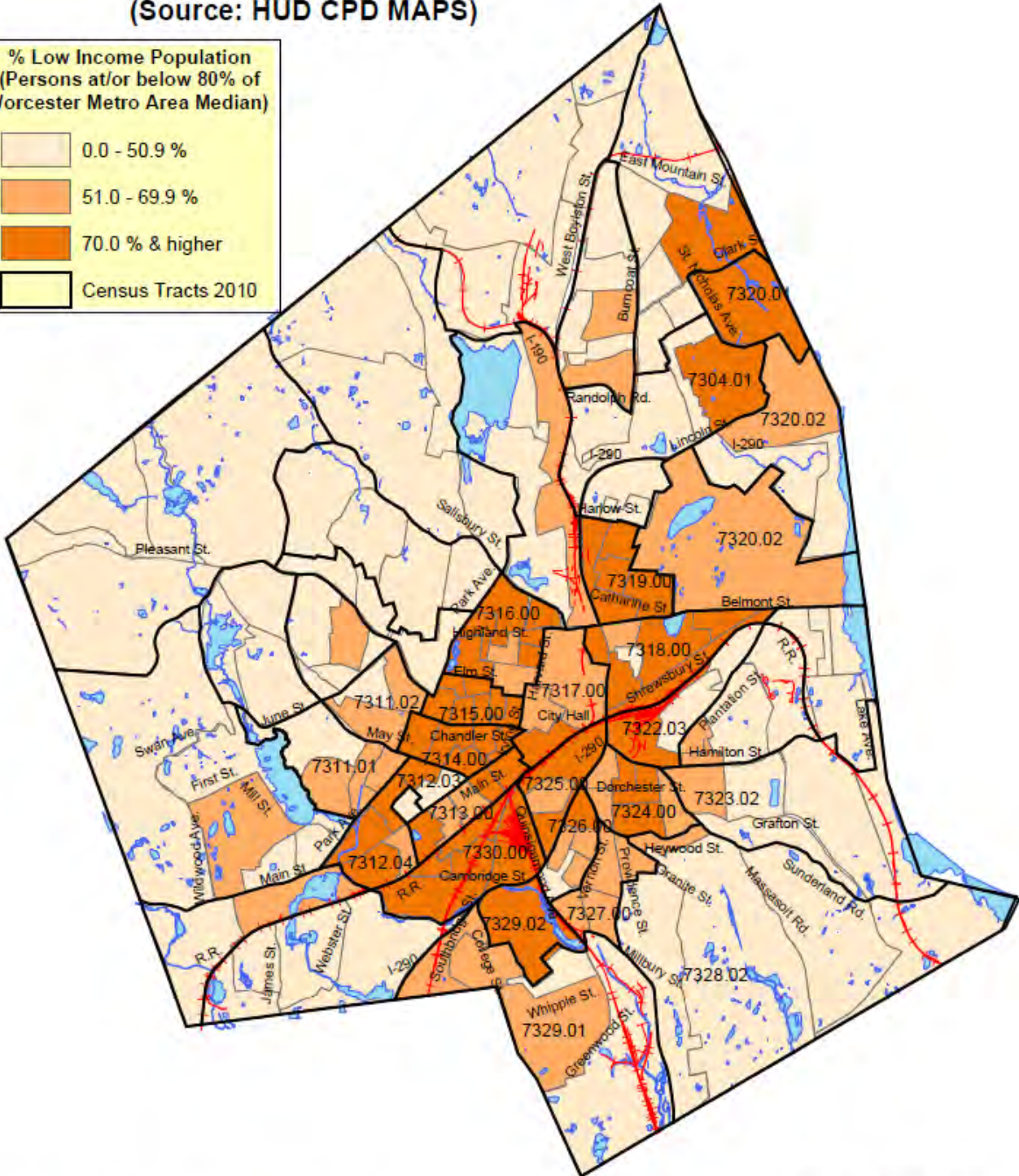
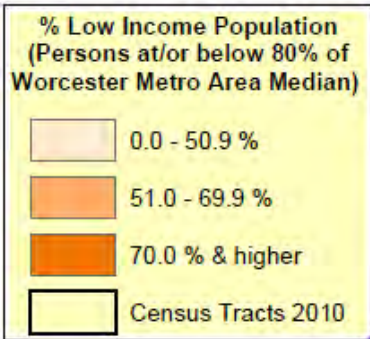
Worcester HOPWA Eligible Metropolitan Statistical Area (EMSA)



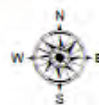
2010 LOW INCOME POPULATION

City of Worcester

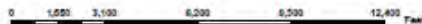
(Source: HUD CPD MAPS)



Produced by
City of Worcester
Geographic Information System
City Manager's Executive Office of
Economic Development



1 Inch = 6,917 Feet



Fifth Year Action Plan

(July 1st, 2019—June 30th, 2020)

Worcester HOPWA Eligible Metropolitan Statistical Area (EMSA)



Green Island Neighborhood

Neighborhood Boundary



Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, © OpenStreetMap contributors, and the GIS User Community

Legend

- Interstate
- U.S.
- State
- Streams and Brooks
- Conservation Restriction
- City of Worcester Parks
- Other Open Space

— Neighborhood Boundary

Produced by City of Worcester
Executive Office of Economic Development
Neighborhood Development Division

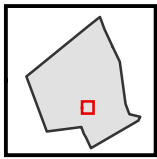
Considerable effort has been made to ensure the accuracy, correctness and timeliness of data presented; however, this information is only as accurate as its sources and does not reflect the most current information. The City of Worcester assumes no liability for any errors, omissions or inaccuracies and makes no warranty, representation or guarantee of any kind as to the content of or any decisions made or actions taken or not taken by the user based upon any information provided on this map.

April 2, 2019



DATA SOURCES:
All data: City of Worcester Geographic Information System
Original Data: Digitized at 1:40,000 scale (Data file resolution: 1 inch = 40 feet)
Updated Using: Spring 2012 Aerial Photographs at 1:20,000 scale (1 inch = 100 feet)
Further Updates: Using City of Worcester Information

COORDINATE SYSTEM:
All map files in the Massachusetts Data File Coordinate system, North American Datum of 1983, Massachusetts Meridian Zone (M15). Units are measured in Feet.



CITY OF WORCESTER, MA 2015-20 CONSOLIDATED SUBMISSION DEMOGRAPHIC ANALYSIS OF TARGET AREAS	Low/ Mod Census Tracts	Dispro- portionate Low/ Mod Census Tracts	City of Worcester MA	Union Hill Target Area
	(Target Area Definitions provided below)			
ITEM	(Target Area Definitions provided below)			
Number of Census Tracts (2010 U.S. Census)	23	14	44	1
% Low/Moderate Income (LMI) Population	69.6%	78.7%	54.4%	72.9%
Population (2010 U.S. Census)	97,927	62,478	181,045	6,459
% of City Population	54.1%	34.5%	100.0%	3.6%
% Population Change 2000-10	4.0%	2.8%	4.9%	-2.7%
Area (sq. miles)	13.4	5.3	38.6	0.4
% of City Area	34.7%	13.6%	100.0%	1.0%
Density (2010 Population per sq. mile)	7,319	11,808	4,691	16,820
% of Area that is parkland	9.6%	4.8%	5.9%	1.6%
% of Area that is water	2.0%	0.7%	2.8%	0.0%
% 2010 Population by Racial/Ethnic groups (U.S. Census)	100.0%	100.0%	100.0%	100.0%
White, non-Hispanic	45.9%	38.3%	59.6%	63.4%
Hispanic	31.3%	38.5%	20.9%	17.1%
Black, non-Hispanic	12.1%	11.9%	10.2%	11.5%
Asian, non-Hispanic	6.8%	7.1%	6.0%	3.2%
American Indian/Alaska Native, non-Hispanic	0.3%	0.4%	0.2%	0.0%
All Other Single Races, non-Hispanic	0.8%	0.9%	0.7%	1.2%
Two or more Races, non-Hispanic	2.6%	2.8%	2.3%	3.6%
2010 Median Age (years)	32.0	29.2	34.7	28.2
2000 Median Age (years)	31.6	29.0	33.4	30.5
% Change in Median Age 2000-10	1.3%	0.7%	3.9%	-7.5%
% of Households with Persons Age 65 or more (2010 U.S. Census)	19.2%	16.4%	22.5%	14.7%
% of Households with Persons Under Age 18 (2010 U.S. Census)	33.1%	34.5%	31.3%	46.4%
% of Persons Age 25 or more, High School Grad (2007-11 American Commtly Survey)	77.2%	74.6%	83.3%	71.9%
% of Persons Age 16 or more, Unemployed (2007-11 American Community Survey)	12.5%	14.4%	9.9%	22.5%
Housing Units (2010 U.S. Census)	41,230	25,680	74,645	2,458
% Owner-Occupied Housing Units (2010 U.S. Census)	23.5%	14.7%	40.9%	21.0%
% Renter-Occupied Housing Units (2010 U.S. Census)	66.7%	74.1%	51.0%	65.8%
% Vacant Housing Units (2010 U.S. Census)	9.7%	11.1%	8.1%	13.2%
% Change in Housing Units 2000-10	3.4%	1.7%	5.6%	2.8%
% Change in Owner-Occupied Units 2000-10	4.0%	2.8%	5.1%	-4.4%
% Change in Renter-Occupied Units 2000-10	0.4%	-1.0%	0.3%	-2.9%
% Change in Vacant Units 2000-10	49.9%	44.5%	63.2%	74.7%
Home-Owner Vacancy Rate - % Owner Units Vacant & For Sale (2010 U.S. Census)	2.4%	3.2%	2.2%	2.8%
Rental Vacancy Rate - % Renter Units Vacant & For Rent (2010 U.S. Census)	7.2%	7.8%	6.9%	7.2%
% of Vacant Units Not on the Market (2010 U.S. Census)	40.8%	39.2%	41.4%	56.8%
% of Occupied Units Owner Occupied for all Racial/Ethnic Groups(2010 U.S. Census)	26.1%	16.6%	44.5%	24.2%
% of Occupied Units Owner Occupied for White, non-Hispanics	34.1%	20.6%	54.2%	30.7%
% of Occupied Units Owner Occupied for Hispanics	12.6%	10.2%	17.8%	14.0%
% of Occupied Units Owner Occupied for Black, non-Hispanics	20.8%	17.8%	29.5%	22.8%
% of Occupied Units Owner Occupied for Asian, non-Hispanics	25.0%	18.8%	40.2%	30.9%
% of Occupied Units Owner Occupied for American Indian/Alaska Native. Non-Hisp.	19.1%	17.8%	26.2%	0.0%
% of Occupied Units Owner Occupied for other Single Race, non-Hispanics	15.7%	11.7%	19.0%	16.2%
% of Occupied Units Owner Occupied for Two or more Races, non-Hispanics	18.4%	15.6%	29.5%	18.2%

<p style="text-align: center;">CITY OF WORCESTER, MA 2015-20 CONSOLIDATED SUBMISSION DEMOGRAPHIC ANALYSIS OF TARGET AREAS</p>	<p style="text-align: center;">Low/ Mod Census Tracts</p>	<p style="text-align: center;">Dispro- portionate Low/ Mod Census Tracts</p>	<p style="text-align: center;">City of Worcester MA</p>	<p style="text-align: center;">Union Hill Target Area</p>
ITEM (below items from U.S. Census 2007-11 American Community Survey)	(Target Area Definitions provided below)			
% Owner Occupied Units in Housing Built >1940	60.3%	77.0%	41.3%	67.0%
% Owner Occupied Households with Housing Cost Burdens >30% of Income	41.5%	47.8%	38.0%	48.2%
% Owner Occupied Households without Vehicle	6.4%	9.3%	4.2%	28.0%
% Owner Occupied Households without Complete Kitchen Facilities	0.1%	0.0%	0.2%	0.0%
% Owner Occupied Households without Complete Plumbing	0.1%	0.0%	0.1%	0.0%
% Renter-Occupied Units in Housing Built >1940	55.0%	60.8%	51.6%	67.2%
% Renter-Occupied Households with Housing Cost Burdens >30% of Income	51.3%	53.5%	48.9%	30.7%
% Renter-Occupied Households without Vehicle	31.1%	36.7%	26.6%	23.1%
% Renter-Occupied Households without Complete Kitchen Facilities	1.5%	1.6%	1.6%	1.0%
% Renter-Occupied Households without Complete Plumbing	0.9%	1.4%	0.8%	0.0%
Consolidated Plan Target Area Definitions:				
<p>Low/Mod Census Tracts = 23 (of the city's 44) census tracts in which at least 51.0% of the population is of low- and moderate income (as per HUD CPD Maps). These 23 tracts are: 7304.01, 7311.01, 7311.02, 7312.03, 7312.04, 7313.00, 7314.00, 7315.00, 7316.00, 7317.00, 7318.00, 7319.00, 7320.01, 7320.02, 7322.03, 7323.02, 7324.00, 7325.00, 7326.00, 7327.00, 7329.01, 7330.00 and 7331.02. [See attached 2010 Low Income Population City of Worcester Map for census tract locations]. Two census tracts (7312.02 & 7329.02) are not included in the Low/Mod Target Area given that they are self-contained, college campuses with unique populations.</p>				
<p>Disproportionate Low/Mod Census Tracts = 14 of the city's census tracts in which at least 64.5% of the population is of low- and moderate-income (as per HUD CPD Maps). These tracts are defined as having a disproportionate share of low- and moderate-income (LMI) population given that the percentage of LMI population in these tracts is at least 10% or more greater than the citywide percentage of 54.4%. These 14 tracts are: 7312.03, 7312.04, 7313.00, 7314.00, 7315.00, 7316.00, 7317.00, 7318.00, 7319.00, 7320.01, 7324.00, 7325.00, 7326.00 and 7330.00. [See attached 2010 Low Income Population City of Worcester map for locations].</p> <p>Census Tract locations of key Neighborhoods Areas are: Main South/Beacon Brightly including the Gardner-Kilby-Hammond (GKH) Section 108 area (7312.03, 7312.04, 7313.00). Piedmont/Pleasant/Elm Park (7314.00, 7315.00, 7316.00), Downtown including CitySquare (7317.00), Shrewsbury Street/East Worcester/Bell Hill/Laurel Hill (7318.00), Lower Lincoln (7319.00), Great Brook Valley /Worcester Housing Authority (7320.01), Union Hill (7324.00), Green Island/Canal district (7325.00), Vernon Hill (7326.00) and South Worcester / South Worcester Industrial Park (7330.00).</p>				
<p>Union Hill Target Area = Census Tract 7324.00. The Union Hill neighborhood was ranked as the city's most distressed and the sixth most distressed in the State according to a 2013 Massachusetts Housing Partnership Analysis. The neighborhood has among the city's highest levels of poverty, crime, problems with idle youth including gangs and drugs, foreclosed properties, absentee property ownership, vacant/boarded-up buildings, empty lots and other economic distress factors. The neighborhood is the focus of a targeted strategy across multiple City departments including Economic Development, Inspectional Services, the Fire Department and Police Department that seeks to improve the quality of life in the area. The City is working in concert with key neighborhood institutions and stakeholders including Worcester Academy, Oak Hill Community Development Corporation (CDC), the Grafton Street Business Association, Girls, Inc., and the Worcester Senior Center to develop a neighborhood revitalization strategy for the area. In addition to inspectional services sweeps and enhanced police foot patrol presence, as part of a multiple phased approach, the City is working to rehabilitate neighborhood physical infrastructure ranging from road resurfacing to comprehensive streetscape improvements in some areas. The City is also engaging interested property owners to rehabilitate their residential properties and commercial storefronts.</p>				



The City of
WORCESTER



City Manager Edward M. Augustus, Jr.'s
Executive Office of Economic Development

Emergency Solutions Grant

Program Guidelines

Revision Date June 26, 2018

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ESG Housing Habitability Standards and Lead-Based Paint Inspection Checklist

ESG Quarterly Performance Report

HUD Entitlement Timesheet Form (Sample) Sample Time and Effort Logs

1. Introduction

1.1 In accordance with federal regulations set forth in 24 CFR 576, including but not limited to 24 CFR 576.400(e), the following ESG Program Guidelines (“Guidelines”) for the provision of Emergency Solutions Grant (“ESG”) assistance are adopted for all ESG funded contracts between the City of Worcester and its sub-recipient agencies. Notwithstanding any provision to the contrary, these Guidelines are intended solely for the convenience of the City’s sub-recipients, and not to limit or alter the requirements of applicable federal, state or local laws, regulations or ordinances (collectively “Law”). Additionally, these Guidelines do not limit or alter the requirements of any contract between the City and any sub-recipient. In all instances, the sub-recipient shall comply fully with the requirements of the applicable contract, as well as applicable Law and the grant agreement between HUD and the City (“Grant Agreement”). In the event of any conflict between these Guidelines and said Law or Grant Agreement requirements, the applicable Law and the requirements of the Grant Agreement shall prevail over these Guidelines.

1.2 The ESG program rules in 24 Code of Federal Regulation (CFR) Part 576 provide general standards for eligible housing activities such as client eligibility, housing quality standards, etc. Other applicable CFRs are:

- Lead-based paint poisoning notification requirements, 24 CFR Part 35, Lead- Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846)
- Smoke alarm requirements, Section 31 of the Federal Fire Prevention and Control Act of 1974; and
- • Equal Access In Accordance With an Individual’s Gender Identity in Community Planning and Development Programs, 24 CFR Part 5
- 2 CFR Part 200

1.3 The ESG program provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly re-house homeless individuals and families; and (6) prevent families and individuals from becoming homeless.

1.4 ESG sub-recipients are required, to the full extent possible, to coordinate ESG activities with other programs targeted towards homeless individuals and families, as well as mainstream housing, health, social services, employment, education and youth programs for which homeless and at-risk families and individuals may be eligible. Agencies with which Sub-recipients shall coordinate may include, for example, the Continuum of Care, HUD-Veteran Affairs Supportive Housing, Education for Homeless Children and Youth, Health Care for the Homeless, Runaway and Homeless Youth, Homeless Veterans

Reintegration, Section 8, Public Housing, HOME Investment Partnership, the Workforce Investment Act, and Temporary Assistance For Needy Families programs.

2. Minimum Program Eligibility Criteria

2.1 The sub-recipient shall conduct an initial evaluation to determine the eligibility of each individual or family for ESG assistance and the types of assistance needed to regain stability in permanent housing.

2.2 ESG assistance is open to individuals and families from the City of Worcester who meet the definitions of either being homeless or at-risk of homelessness. All participants must meet the required income eligibility criteria as follows:

- For Rapid Re-Housing assistance, there is no income restriction for households at initial evaluation. However, at re-evaluation – not less than annually – household income must be below 30% AMI.
- For Homelessness Prevention assistance, households must have an income below 30% AMI at initial evaluation, and have no other housing options, financial resources, or support networks. At re-evaluation - not less than quarterly - the household must have an annual income below 30% AMI.
- The 30% AMI limit does not apply to program participants who are being served under the Emergency Shelter or Street Outreach components.

2.3 Prior to providing services with ESG funds, sub-recipients shall evaluate and clearly document each household's income. The sub-recipient shall determine the level of funding for each program participant through an initial intake assessment prior to providing services with ESG funds. Participants are not eligible if they are already receiving the same type of financial assistance (i.e., prevention, re-housing, or stabilization) during the same time period from another federal or state source. When the participant's income or other circumstances change (e.g. changes in household composition), the sub-recipient shall re-evaluate the participant's eligibility and the amount and types of assistance the participant needs.

2.4 The sub-recipient shall verify and document at the time of intake an individual's/family's homeless status. The priority for verification is as follows: third party documentation first, intake worker observations second, and certification from the person seeking assistance third. However, lack of third party documentation shall not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider. Records contained in an HMIS or comparable database used by victim service or legal service providers and intake worker observations are acceptable evidence of third-party documentation if the database retains an auditable history of all entries, including the person who entered the data, the date of entry, changes made and if the database prevents overrides or changes of dates.

2.5 HMIS participation is a mandatory ESG requirement except for domestic violence and legal assistance providers as set forth in 24 CFR 576.107. All clients receiving ESG assistance must be reported in an approved HMIS system.

3. Limits of Funding Assistance

3.1 For both prevention and rapid re-housing activities, sub-recipients shall provide participants with a fixed amount of financial assistance, up to a maximum of \$4,000 per household per 24 months. ESG sub-recipients may exercise reasonable discretion within this maximum and in accordance with other applicable regulations regarding the amount of rental and utilities assistance provided, as well as the share that participants are required to pay, based on the financial needs of the individual. Agencies may request a waiver to the \$4,000 maximum per household limit in writing to the City of Worcester under hardship circumstances only. Approval of this waiver is solely at the discretion of the City.

3.2 Within this limit and applying the criteria set forth above, sub-recipients may make the assistance available in various forms, including assistance for one-time costs such as first and last month's rent and/or security deposit or in the form of monthly rent supplements. Program participants receiving project-based rental assistance must have a lease for a period not less than one year, regardless of the length of the rental assistance.

3.3 Sub-recipients, depending on the resources available for prevention and applying the criteria set forth above, shall determine the extent and type of assistance that will best assist households maintain their tenancies. However, sub-recipients using ESG funds may not authorize any assistance to households other than immediate emergency shelter prior to obtaining all required documentation as specified in the HUD ESG Regulations located at 24 CFR 576.

3.4 Standards for determining the share of rent and utilities that each program participant must pay, if any, will be based on the following:

- Current Fair Market Rent (FMR) limits per 24 CFR 576.106 (d) when rental assistance is provided (only clients receiving security deposit assistance and/or assistance with rental arrears assistance are exempt from this requirement under homeless prevention contracts); and
- Rent reasonableness, which takes the neighborhood rental prices into account;

3.5 The Sub-recipient is also required to comply with the following when providing rental assistance:

- Minimum habitability standards;
- Visual lead paint inspections; and

- Rental assistance agreement and lease between property manager and tenants as well as owner of property and agency.

3.6 The sub-recipient is expressly prohibited from providing rental assistance to a client if that client is already receiving rental assistance from another public source for the same time period (with the exception of a one-time payment of up to 6 months of rental arrears).

4. **Definitions of Selected Terms**

4.1 As set forth in 24 CFR 576.2, the McKinney-Vento Act defines “homeless” as :

(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;

(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;

(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.

4.2 As set forth in 24 CFR 576.2, the term "At-Risk of Homelessness" is defined as:

(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;

(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.

5. Eligible Activities

5.1 Emergency Solution Grant funding can be used for five program activities as set forth in 24 CFR 576.100(a): street outreach, emergency shelter, homelessness prevention, rapid re- housing assistance, and HMIS. These activities are further detailed in Sections 6 through 9, below.

6. Street Outreach

6.1 Street outreach, as set forth in 24 CFR 576.101, consists of the costs of providing essential services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

6.2 Eligible Street Outreach Activities (in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B) include:

1. Engagement;
2. Emergency Health Services

3. Emergency Mental Health Services; and

4. Transportation

5. Services for Special Populations

7. Emergency Shelter

7.1 The Emergency Shelter component of ESG, as set forth in 24 CFR 576.102, may be used to provide essential services to homeless families and individuals in emergency shelters, to renovate buildings to be used as emergency shelter for homeless families and individuals, and to operate emergency shelters.

7.2. Emergency Shelter Services are essential services to emergency shelter residents. These services may include case management, childcare, employment assistance, life skills, behavioral health services. Individuals and families must be verified as literally homeless or fleeing/attempting to flee domestic violence. There is no income threshold at intake for this activity. ESG funds may be used to provide essential services to homeless individuals and families residing in emergency shelters. An emergency shelter is any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

7.2.1 Emergency Shelter Services, in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B include:

1. Case management
2. Child care
3. Education services
4. Employment assistance and job training
5. Outpatient health services
6. Legal services
7. Life skills training
8. Mental health services
9. Substance abuse treatment services
10. Transportation.
11. Services for special populations

7.2.2 Where the recipient or sub-recipient uses ESG funds solely for essential services or shelter operations, the recipient or sub-recipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The recipient or sub-recipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with

children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or sub-recipient originally provided the services or shelter.

7.2.3 Sub-recipients must comply with all requirements contained within Attachment E, Shelter Support Recordkeeping and Reporting Requirements.

7.3 Shelter Rehabilitation, Renovation and Conversion, as set forth in 24 CFR 576.102(a)(2) includes labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization.

7.3.1 If such activity is included as an eligible cost in Attachments B and C of the particular contract between the ESG sub-recipient and the City, then ESG funds may be used for costs of renovating buildings to be used as emergency shelter for homeless families and individuals or to convert a building for use as an emergency shelter. Eligible costs include labor, materials, tools and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government or private nonprofit organization. For the purposes of this Section, the sub-recipient may also be referred to as "lessee". Sub-recipient may not use ESG funds for rehabilitation or renovation of structures that will be used for inherently religious activities. ESG funds may pay for rehabilitation of structures only to the extent that those structures are used for conducting eligible activities under the ESG program. Where a structure is used for both eligible and religious activities, the amount of ESG funds used may not exceed the cost of those portions of the rehabilitation that are attributable to eligible activities in accordance with the cost accounting requirements applicable to ESG funds. Sanctuaries, chapels, or other rooms used as a principal place of worship are ineligible for funded improvements paid by ESG. To the full extent applicable, sub-recipient shall further comply with any and all requirements particular to faith-based organizations, including but not limited to 24 CFR 5.109.

7.3.2 Each building renovated with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of three (3) or ten (10) years ("minimum use period"), depending on the type of renovation and the value of the building. The minimum use period must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. If the rehabilitation cost of the shelter exceeds 75% of the value of the building before rehabilitation (e.g. major rehabilitation) the minimum period of use is ten (10) years. If the cost to convert a building into an emergency shelter exceeds 75% of the value of the building after conversion, the minimum period of use is ten (10) years. In all other cases where ESG funds are used for renovation, the minimum period of use is three (3) years. The minimum period of use of ten (10) years, required for rehabilitation and conversion must be enforced by a recorded deed or use restriction.

7.3.3 Any building renovated, converted or rehabbed using ESG funds must meet local government regulations, including building code and sanitary code.

7.3.4 Grant amounts may not be used for acquisition or construction of an emergency shelter for the homeless.

7.4 Emergency Shelter Operations, as set forth in 24 CFR 576.102(a)(3), are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual. There is no income threshold at intake for this activity.

7.4.1 The age of a child under age 18 shall not be a basis for denying any family's admission to an emergency shelter that uses ESG funding or services and provides shelter to families with children under age 18.

7.4.2 Sub-recipients shall comply with all requirements Shelter Support Recordkeeping and Reporting Requirements, including as set forth in Attachment E.

7.4.3 Where the sub-recipient uses ESG funds solely for essential services or shelter operations, the sub-recipient shall provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The sub-recipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or sub-recipient originally provided the services or shelter.

7.4.4 Shelter Support recipients shall comply with the Shelter Support Recordkeeping and Reporting Requirements including as set forth in Attachment F.

8. Homeless Prevention

8.1 Homeless Prevention Assistance, as set forth in 24 CFR 576.103, may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in Section 576.2.

8.2 This assistance, referred to as "homelessness prevention", may be provided to individuals and families who meet the criteria under the "at risk of homelessness" definition, or who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in 24 CFR Section 576.2 and have an annual income

below 30 percent of median family income for the area, as determined by HUD. At re-evaluation - not less than once every three months - the participant must have an annual income below 30% AMI.

8.3 The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR Section 576.105, the short-term and medium-term rental assistance requirements in 24 CFR Section 576.106, and the written standards and procedures established under 24 CFR Section 576.400.

8.4 Eligible Homelessness Prevention activities (in accordance with federal regulations Part 576 Emergency Solutions Grants Programs, Subpart B) include:

- Financial assistance costs
 - o Rental application fees
 - o Security deposits equal to no more than 2 months' rent
 - o Last month's rent
 - This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
 - o Utility deposits
 - o Utility payments (up to 24 months including 6 months arrearage per service)
 - A partial payment of a utility bill counts as one month.
 - This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
 - Eligible utility services are gas, electric, water, and sewage.
 - o Moving costs
 - o Temporary storage fees for up to 3 months (no storage fees in arrears)
 - o Note: Late payment penalties are NOT an eligible ESG expense. The recipient or sub-recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.
- Service costs

o Housing search and placement

o Housing stability case management - See Section 10 for eligible activities and requirements

o Mediation *Must be between the program participant and the owner or person(s) with whom the program participant is living, provided the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.*

o Legal services *Must include landlord/tenant matters, and services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.*

o Credit repair/Counseling Services

- Short-term (3 months) and medium-term rental assistance (up to 24 months)
- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

8.5 Housing/stabilization services must occur at least monthly for 12 months. Prevention assistance will be targeted to families at imminent risk of eviction. Sub-recipients will use standard intake/assessment forms intended to determine eligibility and also to highlight other strengths and/or challenges for the household. Prevention services may also be secondarily targeted toward housed individuals for the purposes of eviction prevention. These services would focus on intervention and/or financial assistance as needed to prevent an imminent episode of homelessness.

8.6 The amount of assistance should reflect the cost for the individual or family to stay in place, moves, or establish a new tenancy, up to a maximum of \$4,000 per household within 24 months during any three year period. Agencies may request a waiver to the \$4,000 maximum per household limit in writing to the City of Worcester under hardship circumstances only. Approval of this waiver is solely at the discretion of the City. This assistance may be in the form of short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance. Participants must not be receiving the same type of financial assistance (i.e. prevention, re-housing, or stabilization) during the same time period from another Federal or State source. Providers must re-evaluate participants' eligibility and the types and amounts of prevention assistance needed not less than once every three months. Except as provided for housing stability case management, no program participant may receive more than 24 months of assistance in a three-year period.

8.7 Sub-recipients must conduct an initial eligibility intake and assessment to determine eligibility and level of need. Re-evaluations of each program participants' eligibility as well as types and amounts of

assistance the program participant needs must be conducted on a QUARTERLY BASIS for participants receiving rapid re-housing assistance. At a minimum, the re-evaluation must establish that:

- The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Additionally, when notified of a relevant change to the program participant's income or other circumstances that effect the participant's need for assistance under ESG, the recipient or sub-recipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

8.8 All assisted units must be documented by a lease. Project-based rental assistance leases must have an initial term of not less than one year. Rental agreements between the sub-recipient and the property owner must set forth terms under which assistance will be provided by the sub-recipient to the owner on behalf of the participating household. The written lease must include the tenant's name, address of the unit, term of tenancy, and move in date, rent amount, who is responsible for the utilities and must be signed by both parties and dated. The Sub-recipient must have a copy of the signed lease prior to authorizing any payments to the property owner.

8.9 The lease is not the Rental Assistance Agreement (RA). The RA must be between the Sub-recipient and the property owner and must document the terms of assistance, including requirement the property owner submit to the sub-recipient a copy of any notice to the tenant that could lead to an eviction. The RA is required to be executed before any payment is made to the property owner.

8.10 Assisted units must be at or below Fair Market Rent (FMR) for area and unit size for rent and utilities.

8.11 The sub-recipient shall document "rent reasonableness" using the form in Attachment D. Rent reasonableness shows that the rent of the unit is reasonable in relation to comparable units and provides documented data for units comparable in size, location and rent amounts.

8.12 Sub-recipients must comply with all Homeless Prevention Recordkeeping and Reporting Requirements, including as set forth in Attachment D.

9. Rapid Re-Housing

9.1 Rapid Re-Housing Assistance, as set forth in 24 CFR 576.104, may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing.

9.2 This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet homeless definition. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in Section 576.105, the short- and medium-term rental assistance requirements in Section 576.106, and the written standards and procedures established under Section 576.400.

9.3 For Rapid Re-Housing, an income assessment is not required at initial evaluation. However, at annual re-evaluation, the client's income must be below 30% AMI.

9.4 Eligible Rapid Re-housing Assistance activities (in accordance with federal regulations

Part 576 Emergency Solutions Grants Programs, Subpart B) include:

- Financial assistance costs
 - o Rental application fees
 - o Security deposits equal to no more than 2 months' rent
 - o Last month's rent - This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.
 - o Utility deposits
 - o Utility payments (up to 24 months including 6 months arrearage per service)
 - A partial payment of a utility bill counts as one month.
 - This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments.
 - Eligible utility services are gas, electric, water, and sewage.
 - o Moving costs
 - o Temporary storage fees for up to 3 months (no storage fees in arrears)

Note: Late payment penalties are NOT an eligible ESG expense. The recipient or sub-recipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

- Service costs
 - o Housing search and placement
 - o Housing stability case management – See Section 10 for eligible activities and requirements
 - o Mediation - Must be between the program participant and the owner or person(s) with whom the program participant is living, provided the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.
 - o Legal services -Must include landlord/tenant matters, and services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.
 - o Credit repair/Counseling Services

- Short-term (3 months) and medium-term rental assistance (up to 24 months)

- Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

9.5 Rapid Re-Housing services can only be provided for 30 days and only while homeless. ESG funds may be used to provide housing relocation and stabilization services and short and/or medium term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance may be provided to program participants who meet the criteria of the homeless definition and live in an emergency shelter or other place described in the homeless definition. Rapid Re- housing assistance will be targeted to persons living in an emergency shelter or a place not meant for human habitation, which:

- Does not include Transitional Shelter Programs or Transitional Housing;
- Is a shelter where the shelter guest does not have to meet specific criteria other than being homeless with no place else to go;
- Is a shelter where the guests do not have to sign an occupancy agreement or program participation agreement to access the shelter;

- Is a shelter where the average length of stay is less than 90 days.

9.6 The amount of assistance should reflect the cost for the individual or family to stay in place, moves, or establish a new tenancy, up to a maximum of \$4,000 per household within 24 months during any three year period. Agencies may request a waiver to the \$4,000 maximum per household limit in writing to the City of Worcester under hardship circumstances only. Approval of this waiver is solely at the discretion of the City. This assistance may be in the form of short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance. Participants must not be receiving the same type of financial assistance (i.e. prevention, re-housing, or stabilization) during the same time period from another Federal or State source. Providers must re-evaluate participants' eligibility and the types and amounts of prevention assistance needed not less than once every three months. Except as provided for housing stability case management, no program participant may receive more than 24 months of assistance in a three-year period.

9.7 Sub-recipients must conduct an initial eligibility intake and assessment to determine eligibility and level of need. Re-evaluations of each program participants' eligibility as well as types and amounts of assistance the program participant needs must be conducted not less than ANNUALLY for participants receiving rapid re-housing assistance. At a minimum, the re-evaluation must establish that:

- The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

Additionally, when notified of a relevant change to the program participant's income or other circumstances that affect the participant's need for assistance under ESG, the sub-recipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

9.8 All assisted units must be documented by a lease. Project-based rental assistance leases must have an initial term of not less than one year. Rental agreements between the sub-recipient and the property owner must set forth terms under which assistance will be provided by the sub-recipient to the owner on behalf of the participating household. The written lease must include the tenant's name, address of the unit, term of tenancy, move in date, rent amount, who is responsible for the utilities and must be signed by both parties and dated. The Sub-recipient must have a copy of the signed lease prior to authorizing any payments to the property owner.

9.9 The lease is not the Rental Assistance Agreement (RA). The RA must be between the Sub-recipient and the property owner and must document the terms of assistance, including requirement that the

property owner submit to the Sub-recipient a copy of any notice to the tenant that could lead to an eviction. The RA is required to be executed before any payment is made to the property owner.

9.10 Assisted units must be at or below Fair Market Rent (FMR) for area and unit size for rent and utilities.

9.11 The sub-recipient shall document "rent reasonableness" using the form in Attachment D. Rent reasonableness shows that the unit rent is reasonable in relation to comparable units and provides documented data for units comparable in size, location and rent amounts.

9.12 Sub-recipients must comply with all Rapid Re-Housing Recordkeeping and Reporting Requirements, set forth in Attachment E.

10. Housing Stability Case Management

10.1 ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

- a. Using the centralized or coordinated assessment system as required under § 576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
- b. Conducting the initial evaluation required under § 576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
- c. Counseling;
- d. Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
- e. Monitoring and evaluating program participant progress;
- f. Providing information and referrals to other providers;
- g. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and

h. Conducting re-evaluations required under § 576.401(b).

10.2 While providing homelessness prevention or rapid re-housing assistance to a program participant, the recipient or sub-recipient must:

- Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and
- Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

10.3 The recipient or sub-recipient is exempt from the requirement under paragraph (e)(1)(i) of this section if the Violence Against Women Act of 1994 (42 U.S.C. 13701 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits that recipient or sub-recipient from making its shelter or housing conditional on the participant's acceptance of services.

11. Housing Information Management System (HMIS)

11.1 In accordance with regulations set forth at 576 CRF 107, the sub-recipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, fax machines, and furniture
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying salaries for operating HMIS, including:
 - o Completing data entry
 - o Monitoring and reviewing data quality
 - o Completing data analysis
 - o Reporting to the HMIS Lead
 - o Training staff on using the HMIS or comparable database
 - o Implementing and complying with HMIS requirements
- Cost of staff to travel to and attend HUD–sponsored and HUD–approved training on HMIS and programs authorized by Title IV of the McKinney–Vento Homeless Assistance Act
- Costs to conduct intake
- Participation fees charged by the HMIS Lead.

11.2 If the recipient is the HMIS lead agency, as designated by the Continuum of Care, it may also use ESG funds to pay the costs of:

- Hosting and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data
- Upgrading, customizing, and enhancing the HMIS
- Integrating and warehousing data, including development of a data warehouse for use in aggregating data from sub-recipients using multiple software system
- Administering the system
- Reporting to providers, the Continuum of Care, and HUD
- Conducting training on using the system or a comparable database, including traveling to the training

11.3 If the sub-recipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

11.4 Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

12. Ineligible ESG Activities

Ineligible costs include, but are not limited to:

- Assistance where other resources are available
- Recruitment or ongoing staff training
- Depreciation
- Costs associated with the organization rather than the facility (e.g. advertisements, pamphlets about the organization, surveys, etc.)
- Public relations
- Acquisition or new construction of an emergency shelter for the homeless
- Costs associated with the organization rather than the specific program renovation, rehabilitation, or conversion of structures used exclusively for religious purposes or which will otherwise promote religious interests except through the creation or utilization of a wholly secular entity
- Any costs associated with advertisements, pamphlets, surveys, etc.
- Staff training, entertainment, conferences or retreats
- Public relations or fundraising

- Recipient bad debts/late fees
- Program participant mortgage assistance/payments and any issues related to mortgages
- Recipient mortgage/debt service
- Indirect costs
- Legal services for immigration and citizenship matters
- Retainer fee arrangements and contingency fee arrangements
- Substance abuse treatments services for inpatient detoxification and other inpatient drug or alcohol treatment
- Payment of temporary storage fees in arrears
- Late payment penalties
- Purchase of office space
- Sub-recipient post due taxes or late fees
- Repayment of utility or security deposits to the sub-recipient not tracked as program income
- Construction or rehabilitation
- Credit card or other consumer debt
- Car repairs
- Program participant travel costs
- Medical or dental care and medicines
- Clothing and grooming
- Home furnishings
- Pet care
- Entertainment activities
- Work or education related materials
- Indirect costs
- Cash assistance to program participants
- Develop discharge planning programs in mainstream institutions such as hospitals, jails or prisons
- Funds issued directly to program participants
- Program fees
- Fees charged to the program applicant or participant

13. Case Management Requirements

13.1 In accordance with 576 CRF 576.401(e), while providing homelessness prevention or rapid re-housing assistance to a program participant, the sub-recipient must:

- A. Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and
- B. Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's

current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

13.2 The sub-recipient is exempt from the requirement under paragraph (e)(1)(i) of this section if the Violence Against Women Act of 1994 (42 U.S.C. 13701 et seq.) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 et seq.) prohibits that recipient or sub-recipient from making its shelter or housing conditional on the participant's acceptance of services.

13.3 Case managers shall help connect households with appropriate services and financial assistance through other public and private homeless assistance and mainstream programs. Case managers shall keep clear and concise case notes documenting the meetings including their goals and outcomes.

14. Habitability Standards and Lead Based Paint Requirements

14.1 In accordance with 24 CFR 576.403, all units in which program participants receiving assistance live must meet HUD Habitability Standards. Sub-recipients are required to complete the Emergency Solutions Grant Housing Shelter and Housing Standard Inspection Checklist (also known as the "Habitability Checklist") for all participants receiving financial assistance for their housing units. This checklist can be found in Attachment C. The only exception to this requirement is in cases where only security deposits assistance and/or rental arrearage assistance is being provided.

14.2 All assisted units must meet federal lead paint requirements if the unit was constructed before 1978 and if a child under 6 and/or a pregnant woman is or will be residing in the unit. Sub-recipients must document these inspections using the Habitability Checklist, which also addresses lead paint standards. The unit must meet ALL standards on the checklist or MAY NOT be used. The inspection must include, at a minimum:

- Verification of age of structure;
- Visual assessment and confirmation that paint surfaces are not chipping, cracking or peeling using the Habitability Checklist.; and
- Verification that the unit has been de-lead or paint encapsulated from a Massachusetts approved de-leading vendor.

14.3 Sub-recipients are highly encouraged to complete an online tutorial on completing lead based paint visual inspections which takes approximately 20 minutes to complete and is located at: <http://www.hud.gov/offices/lead/training/visualassessment/h00101.htm>. If any sub-recipients already

had a Habitability Checklist in place, they just need to make sure that the lead based paint assessment is included.

14.4 The habitability and visual lead inspections are not required to be completed by certified inspectors.

14.5 If a HUD approved inspection for Section 8 has been recently completed for the unit, a copy of that inspection report in the client's file is sufficient because the regulations governing Section 8 inspections are more stringent than those governing ESG inspections.

14.6 A lead-free certification for a unit can also be used to satisfy the lead paint requirement.

14.7 Many houses and apartments built before 1978 have paint that contains lead (called lead-based paint). Lead from paint, chips and dust can pose serious health hazards. HUD requires Project Sponsors to give all ESG clients the lead-based paint pamphlet entitled Protect Your Family from Lead in Your Home. The client's case file should include documentation that a copy of the pamphlet was given to the client. The pamphlet was developed by the Environmental Protection Agency in response to concern about lead-based paint hazards in the home. Copies of the pamphlet are available at the following website address:

English version: <http://www.epa.gov/lead/pubs/leadpdf.pdf>

Spanish version: <http://www.epa.gov/lead/pubs/pyfcameraspan.pdf>

15. Termination of Assistance

15.1 In accordance with 24 CFR 576.402, if a program participant violates program requirements, the sub-recipient may terminate the assistance in accordance with a formal process established by the sub-recipient. That process must recognize the rights of individuals affected. The sub-recipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. Sub-recipient may terminate assistance to a program participant if the rules of the program are violated. The termination must be preceded by a due process to include, at a minimum:

- Written notification and clear statement of reasons for termination from the program;
- Opportunity to appeal to a third party; and
- Prompt appeal response

Termination shall only happen in the most severe of cases and shall be clearly documented in the program participant's file.

15.2 With regard to program participants receiving rental assistance or housing relocation and stabilization services, to terminate such assistance or services, the required formal process, at a minimum, must consist of:

- (1) Written notice to the program participant containing a clear statement of the reasons for termination;
- (2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
- (3) Prompt written notice of the final decision to the program participant.

15.3 Termination under this section does not bar the sub-recipient from providing further assistance at a later date to the same family or individual.

16. General Recordkeeping and Reporting Requirements

16.1 The sub-recipient must have policies and procedures in place to ensure that ESG funds are used in accordance with the regulatory requirements. In addition, sufficient records must be established and maintained to enable the City and HUD to determine whether ESG requirements are being met.

16.2 In general, all clients receiving ESG assistance must have the following documentation included, but not limited to, in their case file:

- (i) Documentation of Homeless or At-risk Homeless Status (additional details regarding this documentation are provided below);
- (ii) Documentation of income (third-party verification whenever possible, if not- self declaration of income forms will suffice);
- (iii) In the form of case notes, evidence of at least an initial in-person consultation with a case manager including a needs assessment and formulation of a long-term plan for housing stability;
- (iv) HMIS Intake form at program entry;
- (v) Quarterly or annual re-evaluations, depending on program component; and
- (vi) HMIS Exit form upon program completion.

16.3 All sub-recipients are required to use the forms included in Attachment C.

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

- (i) Lease or Rental Agreement;
- (ii) Rent Reasonableness Checklist;
- (iii) Housing Habitability Standards Checklist; and

16.5 All program participants 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, including clear documentation of the monthly stabilization meetings.

16.6 Sub-recipients administering Shelter Support, Homeless Prevention and Rapid Re-housing activities shall use the State Department of Housing and Community Development (DHCD) reporting and recordkeeping requirements contained in Attachments F, G and H respectively as a guide for maintaining client files.

17. Documentation of Homeless Status

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

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

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

- Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or
- Where the evidence in paragraph (b)(2)(i) of this section is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in paragraph (b)(2)(i) and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.

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

- A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law;
 - o For individuals and families whose primary nighttime residence is a hotel or motel room not paid for by charitable organizations or federal, state, or local government programs for low-income individuals, evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance; or
 - o An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance. The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either: (I) be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or (II) if the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete;

- Certification by the individual or head of household that no subsequent residence has been identified and
- Certification or other written documentation that the individual or family lacks the resources and support networks needed to obtain other permanent housing.

17.5 If the individual or family qualifies as homeless under paragraph (3) of the homeless definition in § 576.2, because the individual or family does not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute or section 725(2) of the McKinney–Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), the evidence must include:

- o For paragraph (3)(i) of the homeless definition in § 576.2, certification of homeless status by the local private nonprofit organization or state or local governmental entity responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786), or subtitle B of title VII of the McKinney–Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable;
- o For paragraph (3)(ii) of the homeless definition in § 576.2, referral by a housing or service provider, written observation by an outreach worker, or certification by the homeless individual or head of household seeking assistance;
- o For paragraph (3)(iii) of the homeless definition in § 576.2, certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60–day period immediately preceding the date of application for homeless assistance, including: recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or, where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records. Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address; and

17.6 For paragraph (3)(iv) of the homeless definition in § 576.2, written diagnosis from a professional who is licensed by the state to diagnose and treat that condition (or intake staff-recorded observation of disability that within 45 days of date of the application for assistance is confirmed by a professional who

is licensed by the state to diagnose and treat that condition); employment records; department of corrections records; literacy, English proficiency tests; or other reasonable documentation of the conditions required under paragraph (3)(iv) of the homeless definition.

17.7 If the individual or family qualifies under paragraph (4) of the homeless definition in § 576.2, because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other housing. If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. Otherwise, the oral statement that the individual or head of household seeking assistance has not identified a subsequent residence and lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain housing must be documented by a certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

18. Documentation of At-Risk of Homelessness Status

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

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

- The documentation specified under this section for determining annual income;

- The program participant's certification on a form specified by HUD that the program participant has insufficient financial resources and support networks; e.g., family, friends, faith-based or other social networks, immediately available to attain housing stability and meets one or more of the conditions under paragraph (1)(iii) of the definition of “at risk of homelessness” in § 576.2;
- The most reliable evidence available to show that the program participant does not have sufficient resources or support networks; e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition. Acceptable evidence includes:
 - o Source documents (e.g., notice of termination from employment, unemployment compensation statement, bank statement, health-care bill showing arrears, utility bill showing arrears);
 - o To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, public administrator, relative) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party that the applicant meets one or both of the criteria under paragraph (1)(ii) of the definition of “at risk of homelessness” in § 576.2; or
 - o To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or sub-recipient's intake staff describing the efforts taken to obtain the required evidence; and

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

- o Source documents that evidence one or more of the conditions under paragraph (1)(iii) of the definition (e.g., eviction notice, notice of termination from employment, bank statement);
- o To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., former employer, owner, primary leaseholder, public administrator, hotel or motel manager) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party that the applicant meets one or more of the criteria under paragraph (1)(iii) of the definition of “at risk of homelessness”; or

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

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

19. Additional Recordkeeping Requirements

19.1 In addition to evidence of homeless status or “at risk of homelessness” status, as applicable, records must be kept for each program participant that document:

- The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;
- Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at § 576.101 through § 576.106, the provision on determining eligibility and amount and type of assistance at § 576.401(a) and (b), and the provision on using appropriate assistance and services at § 576.401(d) and (e); and
- Where applicable, compliance with the termination of assistance requirement in § 576.402.

19.2 The sub-recipient must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

19.3 The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

19.4 The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

19.5 The records must include documentation of compliance with the shelter and housing standards in § 576.403, including habitability checklists.

19.6 The sub-recipient must keep records of the participation in HMIS or a comparable database by all projects of the recipient and its sub-recipients.

19.7 The sub-recipient must keep records of the source and use of contributions made to satisfy the matching requirement in § 576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

19.8 The sub-recipient must document its compliance with the homeless participation requirements under § 576.405.

19.9 The sub-recipient must develop and implement written procedures to ensure:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
- The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or sub-recipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

19.10 The confidentiality procedures of the recipient and its sub-recipients must be in writing and must be maintained in accordance with this section.

A. General Requirements

All information about the applicant/client is confidential. Disclose information only for the purpose of determining program eligibility, providing benefits, or investigating possible violation of federal, state and local regulation(s) associated with ESG delivery and never in a setting where members of the public can hear the conversation.

Sub-recipient must have policies and procedures that ensure all client information and records are secure and confidentially maintained. Sub-recipient' officers, employees and agents must be aware of and comply with sub-recipient' confidentiality policies and procedures.

B. Electronic Confidentiality

Electronic collection of client information requires procedures for ensuring confidentiality. The following guidelines apply to the use of a computer:

- The computer terminal(s) used must be located in a secure location, limiting access to only those persons who have a legitimate interest in and are responsible in viewing client records.
- The computer monitor must be cleared (or a screen saver activated) immediately after accessing a client record.
- The computer terminal must be on a "locked" mode or turned off if the terminal is unattended.
- Access to the HMIS program shall be given to authorize staff persons and only insofar as access is necessary for performing the work required for the ESG program.

C. Victims of Domestic Violence

Sub-recipient must implement procedures to ensure confidentiality of records pertaining to any individual who is provided family violence prevention or treatment services. Victim information cannot be disclosed to any third party without consent of the victim.

Victim service providers are prohibited from entering data in HMIS; however, they are required to maintain comparable databases of their own design which provide aggregate information and data consistent with HMIS data collection requirements. Projects serving survivors of domestic violence where the recipient is not a victim services provider are required to enter data in their HMIS.

Sub-recipient must instruct all staff that the address of a domestic violence provider's shelter location will not be made public without permission of the provider.

D. Release of Information

Client information (including identifying the person is a client) should not be released without written authorization from the client. A Release of Information form must be completed by the applicant at the time of intake.

Client refusal to provide such authorization cannot be the basis for denying program services to otherwise eligible clients.

Release forms must be time-limited and specific as to with whom and what information will be shared.

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

- Annual income. For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:
 - o Income evaluation form containing the minimum requirements specified by HUD and completed by the recipient or sub-recipient; and
 - o Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement);
 - o To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by the recipient's or sub-recipient's intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
 - o To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3– month period following the evaluation.

20. Match Requirements

20.1 In accordance with 24 CFR 576.201, a sub-recipient is required to make matching contributions to supplement its ESG program in an amount that equals the amount of ESG funds provided by the City.

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

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

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

20.3 In order to meet the matching requirement, the matching contributions must meet all requirements that apply to the ESG funds provided by HUD, except for the expenditure limits in Section 576.100.

20.4 The matching contributions must be provided after the date that HUD signs the grant agreement and must be expended within the expenditure deadline for the grant.

20.5 Contributions used to match a previous ESG grant may not be used to match a subsequent ESG grant.

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

20.7 The matching requirement may be met by one or both of the following:

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

(ii) Noncash contributions. The value of any real property, equipment, goods, or services contributed to the sub-recipient's ESG program, provided that if the sub-recipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building. To determine the value of any donated material or building, or of any lease, the recipient must use a method reasonably calculated to establish the fair market value. Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or sub-recipient's organization. If the recipient or sub-recipient does not have employees performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the

same labor market. Some noncash contributions are real property, equipment, goods, or services that, if the recipient or sub-recipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or sub-recipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

21. Monitoring/Administration

21.1 Procurement

- It is the policy of the City of Worcester to promote open and full competition in the solicitation of goods and services.
- The procurement plan shall be consistent with the original guidance from the funding source and affiliated oversight agencies responsible for the procurement, and other state and/or federal source(s) requirements.
- City of Worcester staff shall develop a procurement timeline. In determining procurement timelines, primary consideration is given to balancing the conflicting needs of delivering services as soon as possible, adequate time for proposal reviews, and fair proposal preparation time frames for bidders. City of Worcester staff will oversee procurement scheduling to ensure this balance is fair and reasonable.
- The City of Worcester shall make informed decisions for its ESG funding allocation with local input by an ESG Advisory Committee comprised of community experts in the field of housing/homelessness services. Applicants who apply for ESG grant funding are then scored based on their capacity to meet local community needs as well as:
 - adequate financial resources being available
 - ability to meet program outcomes and specifications at reasonable cost
 - technical skills necessary to perform the work
 - consumer convenience, preferences and demands
 - demographics of consumers to be served
 - satisfactory past performance; if past performance data is not available as in the case of new programming, satisfactory demonstration of the ability to meet program outcomes and specifications at a reasonable cost
- Each procurement process targets resources in accordance with the City of Worcester's Five Year Consolidated Plan (2015-2020), updated annually through the Annual Action Plan process. All precautions are taken to ensure the absence of conflict of interest, and that determinations of awards

are made impartially. Reviews are completed on all procurements for compliance with relevant federal and state laws, regulations and policies.

21.2 Project Sponsor Oversight

- The City of Worcester must comply with all applicable state and federal policies, standards, and guidelines as specified in the grant agreement between HUD and the City, and the contract between the City and Sub-Recipients; and is responsible for ensuring efficient, effective, and proper implementation of the ESG program in its geographic area of responsibility.
- The City of Worcester will ensure that Project Sponsors properly manage ESG funds in compliance with the monitoring standards established as part of the City of Worcester CDBG Policies and Procedures and HUD regulations. The City of Worcester must assure that Project Sponsors develop local ESG policies as needed. These local policies should not conflict with guidance provided by the City of Worcester or the ESG regulations (24 CFR Part 576) as developed and amended by HUD.

Organizational - The provision of any type or amount of ESG assistance may not be conditioned on an individual's or household's acceptance or occupancy of emergency shelter or housing owned by sub-recipient or an affiliated organization. A sub-recipient is prohibited from conducting a participant's intake assessment to determine program eligibility if the participant resides in housing where the sub-recipient has ownership interest. Sub-recipient would need to find another independent organization that is also an ESG grantee to do the intake assessment and ensure that all program participants are eligible even if the sub-recipient has a waiver of the conflict of interest requirements. Conflict of interest waivers regarding rent assistance and rental agreement requirements can only be approved by HUD. If a sub-recipient wishes to apply for a waiver, they should contact the sub-recipient homeless program coordinator or manager for guidance in submission of a waiver request which must be approved by City of Worcester who will then submit to HUD. See 24 CFR 576.404(a).

Sub-recipient must keep records to show compliance with ESG program organizational conflicts-of-interest requirements.

Individual - For the procurement of goods and services, sub-recipient must comply with the codes of conduct and conflict of interest requirements under 24 CFR 85.36 (for governments) or 24 CFR 84.42 (for private nonprofit organizations). Persons for whom the Conflict of Interest requirements apply include any person who is an employee, agent, consultant, officer, or elected or appointed official of the sub-recipient agency. No person who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in

a position to participate in a decision-making process or gain inside information with regard to activities assisted under the Program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one year period following his or her tenure.

Upon the written request from the City of Worcester, HUD may grant an exception to the provisions of this paragraph on a case-by-case basis. Sub-recipients wishing an exception must submit requests to City of Worcester for review and forwarding to HUD. There is no guarantee that an exception will be approved.

- As the Responsible Entity for the jurisdiction served under ESG Grant funds, the City of Worcester is responsible for completing Environmental Reviews to assure compliance with the National Environmental Policies Act (NEPA) under 24 CFR Part 58.
- When monitoring sub-recipients, the City shall be reviewing, at a minimum, the following:
 - Proper policies and procedures for determining and documenting participant eligibility, administering financial assistance and providing services to participants.
 - Proper and consistent use of all required forms in Attachment C.
 - Proper documentation of participant eligibility including homeless/at risk of homelessness status and income eligibility.
 - Proper documentation of assessed need including proper intake assessments and proof of lack of other resources available to participants.
 - Activity-specific documentation including clear, detailed case notes that include referrals and services provided, rental documentation, utility records, writ of summary process and complaint, etc.
 - Data collection/HMIS data sets
 - Staff time records including detailed, signed ESG time tracked using time and effort logs.
 - Financial documentation including back-up documentation for all program expenditures that can be specifically tied to the ESG grant.
 - 100% of the award must be matched with documented cash or leveraged resources clearly tracked with appropriate back-up.
 - Lease documents, copies of checks paid to landlords and Habitability Checklists for all assisted units.

21.3 City of Worcester Staff

The City is responsible for managing the day-to-day operations of its Entitlement Programs and ensuring that entitlement funds are used in keeping with program requirements. Implementation of entitlement activities by sub-recipients will be monitored in accordance with the City of Worcester's CDBG Policies and Procedures Manual.

The ESG Program Coordinator for the City of Worcester's Executive Office of Economic Development is responsible for coordinating all ESG sub-recipient activities including but not limited to: the execution of grant agreements; intake and processing of reimbursement requests; desk and on-site monitoring; and general technical assistance.

The ESG Program Coordinator may be reached by phone or e-mail to answer questions relating to program oversight:

Direct Tel: 508-799-1400 x 31407

455 Main Street, 4th Floor

Worcester MA 01608

ESG Financial Assistance & Housing Unit Documentation Checklist

ESG Participant(s) Name _____

In File (Always Applicable)	<i>Documentation</i>
<input type="checkbox"/>	HOUSEHOLD MEMBER IDENTIFICATION – Verification of each household member’s identity, per requirement/standard set by ESG grantee.
<input type="checkbox"/>	ESG FINANCIAL ASSISTANCE NOT USED FOR SAME COST TYPE AND SAME PERIOD AS OTHER FEDERAL, STATE, LOCAL PROGRAM ASSISTANCE – ESG staff assessment with participant to identify if other federal, state, local program is assisting with same cost type for same period.

Applicable	In File	ESG FINANCIAL ASSISTANCE – Documentation showing eligible use of ESG Financial Assistance. NOTE: indicate where documentation is kept if not in participant case file (e.g., “supporting documentation for expenses kept in accounts payable file”).
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<p>RENTAL ASSISTANCE</p> <ul style="list-style-type: none"> <input type="checkbox"/> Supporting documentation for expense (e.g., eviction letter, court documents, bill/invoice, etc.) <input type="checkbox"/> Rental arrears – supporting documentation <input type="checkbox"/> Current/ongoing rental assistance – supporting documentation <input type="checkbox"/> Rental application fees – supporting documentation <input type="checkbox"/> Other ESG eligible fees/penalties (see ESG guidance/FAQs) – supporting documentation -- AND -- <input type="checkbox"/> Copy of rental lease or occupancy agreement for unit assisted with ESG <input type="checkbox"/> Rental arrears – copy of lease or occupancy agreement <input type="checkbox"/> Current/ongoing rental assistance – copy of lease or occupancy agreement -- AND -- <input type="checkbox"/> Documentation indicating arrears assistance not greater than 6 months total -- AND -- <input type="checkbox"/> Documentation indicating total assistance (including arrears) not greater than 18 months total
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<p>UTILITY PAYMENT</p> <ul style="list-style-type: none"> <input type="checkbox"/> Supporting documentation for expense (e.g., shut-off notice, print-out from utility company, bill/invoice, etc.) <input type="checkbox"/> Utility arrears – supporting documentation <input type="checkbox"/> Current/ongoing utility assistance – supporting documentation <input type="checkbox"/> Other ESG eligible fees/penalties (see ESG guidance/FAQs) – supporting documentation -- AND -- <input type="checkbox"/> If utility not in ESG participant name, other documentation indicating ESG participant responsibility for utility -- AND -- <input type="checkbox"/> Documentation indicating arrears assistance not greater than 6 months total -- AND --

Applicable	In File	ESG FINANCIAL ASSISTANCE – Documentation showing eligible use of ESG Financial Assistance. NOTE: indicate where documentation is kept if not in participant case file (e.g., “supporting documentation for expenses kept in accounts payable file”).
		<input type="checkbox"/> Documentation indicating total assistance (including arrears) not greater than 18 months total
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	SECURITY DEPOSIT <input type="checkbox"/> Supporting documentation for expense (e.g., current lease, letter from landlord, bill/invoice, etc.)
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	MOVING COSTS <input type="checkbox"/> Supporting documentation for expense (e.g., bill/invoice, etc.) -- AND -- <input type="checkbox"/> Supporting documentation that vendor had best/most reasonable cost (e.g., newspaper ads, quotes, etc.) -- AND (for storage costs)-- <input type="checkbox"/> Documentation indicating assistance not greater than three months or until participant is in housing, which ever occurs sooner
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	HOUSING VOUCHER <input type="checkbox"/> Supporting documentation for expense (e.g., bill/invoice, etc.) -- AND -- <input type="checkbox"/> Supporting documentation that vendor had best/most reasonable cost (e.g., newspaper ads, quotes, etc.) -- AND -- <input type="checkbox"/> Documentation indicating no appropriate shelter bed(s) available (e.g., ESG staff description of attempt to secure placement in emergency shelter and lack of available, appropriate bed(s))
Notes:		

Applicable	In File	HOUSING UNIT - Documentation showing ESG assistance used for eligible housing unit.
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	RENT REASONABLENESS – If receiving ESG Financial Assistance (current/ongoing rent or security deposit) AND staying in current unit or moving to new housing unit. <input type="checkbox"/> Documentation indicating rent charged for unit is comparable with unassisted units with similar amenities.
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	HABITABILITY STANDARDS INSPECTION – If receiving ESG Financial Assistance (any type) AND moving to new housing unit. <input type="checkbox"/> Documentation indicating unit meets HUD Habitability Standards for ESG (or higher standard if set by grantee, e.g. Housing Quality Standards (HQS)).
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	LEAD-BASED PAINT INSPECTION – If receiving ESG Financial Assistance (any type) AND staying in current housing unit or moving to new housing unit AND unit built before 1978 AND child under 6 years old or pregnant woman in household. <input type="checkbox"/> Documentation indicating unit passed lead-based paint inspection.
Notes:		

Applicable	In File	HOUSING UNIT - Documentation showing ESG assistance used for eligible housing unit.

ESG Housing Options and Resources Eligibility

“But For” Certification

Applicant Name:

This document is to certify that the above named applicant or household has explored all re-housing options and all available resources. The case manager also certifies that a comprehensive assessment was completed and that the findings are such that the above named applicant or household would remain homeless **but** for ESG RRH assistance. (See attached assessment)

Client Certification

Under penalty of perjury I, _____ affirm the following statements to be true.

- a. I affirm that I have explored all housing options, (family, friends, public housing, and private housing), and that I have not been able to secure housing.
- b. I affirm that I have accurately reported my family composition and total family income.
- c. I affirm that my household lacks the financial resources and support networks needed to obtain immediate housing (i.e. startup costs, etc.).
- d. I affirm that I am not receiving financial assistance for the same reason that I am applying for ESG funds.
- e. I affirm that I would re-main homeless **but** for ESG assistance.

Applicant’s Signature

Date:

Case Manager Certification

Under penalty of perjury I, _____ affirm the following statements to be true.

- a. Upon completion of assessment, I affirm that the above named applicant has proven that they have explored all housing options and have not been successful with securing housing.
- b. Upon completion of assessment, I affirm that the above named applicant/household lacks the financial resources and support networks needed to obtain immediate housing.
- c. I certify that I have completed a thorough assessment, including alternative housing options, income and asset verifications and homeless verifications, and believe that the above named applicant or household would re-main homeless **but** the ESG assistance.

Case Manager’s Signature

Date:

ESG Income Eligibility Calculation Worksheet

To be eligible for ESG Homelessness Prevention, households must be at or below 30% of the Area Median Income (and meet other ESG eligibility requirements, as outlined in the Notice). Households receiving Rapid Re-housing services must be at or below 30% of the Area Median Income(AMI) at recertification. A copy of this worksheet must be kept in the client's file.

Household Member Number	Household Member Name		Age of Household Member		
1	Jane Smith		50		
2	Bob Smith		16		
3	Joe Smith		19		
4					
5					
6					
7					
8					
9					
10					
11					
Total Household Members (Household size)			3		
30% of Area Median Income (AMI) for Household Size			\$ 26,450		
Household Member Number/Name	Sources of Household Income	Gross Documented Current Income Amount	Frequency of Income	Number of Payments per Year	Annual Gross Income (gross income amount X # of payments per year)
1/Jane Smith	Earned Income (for ADULT household members only)	\$ 120	Weekly	52	\$ 6,240
3/Joe Smith	Earned Income (for ADULT household members only)	\$ 400	Bi-Weekly	26	\$ 10,400
	Earned Income (for ADULT household members only)	\$ -			\$ -
	Self-employment/business income	\$ -			\$ -
	Self-employment/business income	\$ -			\$ -
	Interest & Dividend Income	\$ -			\$ -
	Interest & Dividend Income	\$ -			\$ -
	Pension/Retirement Income	\$ -			\$ -
	Pension/Retirement Income	\$ -			\$ -
	Unemployment & Disability Income	\$ -			\$ -
	Unemployment & Disability Income	\$ -			\$ -
	TANF/Public Assistance	\$ -			\$ -
	TANF/Public Assistance	\$ -			\$ -
1/Jane Smith	Alimony, Child Support and Foster Care Income	\$ 250	Monthly	12	\$ 3,000
	Alimony, Child Support and Foster Care Income	\$ -			\$ -
	Armed Forces Income	\$ -			\$ -
	Armed Forces Income	\$ -			\$ -
	Other (specify):	\$ -			\$ -
	Other (specify):	\$ -			\$ -
Total Annual Gross Income from all Sources					\$ 19,640
30% of Area Median Income for Household Size:					\$ 26,450
Variance (If income less than AMI, then household is income eligible)					\$ (6,810)
Is the household at or below 30% Area Median Income?					YES-Income Eligible

Emergency Solutions Grants Program (ESG)

VERIFICATION OF INCOME

ESG Applicant(s) Name: _____

Instructions for Employer/Payment Source Representative: This is to certify the income received by the above named individual for purposes of participating in the ESG program. This information will be used only to determine the eligibility status and level of benefit of the household. **Complete only the selected section below that includes an authorization to release information.**

Please return this form to:

Name & Title: _____ Phone: _____
Address: _____ Fax: _____
Email: _____

Employment Income

ESG Applicant Release: I hereby authorize the release of the following employment information.

ESG Applicant Signature: _____ Date: _____

Employer representative to complete this section:

The person named above is employed by _____ since _____. He/she is paid \$ _____ on a _____ basis and is currently working an average of _____ hours per _____.

Additional compensation please specify (if any): _____

Probability of continued employment: _____

Authorized Employer Representative Signature: _____ Date: _____

Name, Title: _____

Address and Phone: _____

Payments and/or Benefit Income (complete one form for each distinct source of income for person named above)

- CIRCLE ONE:**
- | | | |
|---------------------|---------------------------|------------------------|
| Social Security/SSI | Pension/Retirement | TANF |
| Public Assistance | Unemployment Compensation | Workers Compensation |
| Alimony Payments | Foster Care Payments | Child Support Payments |
| Armed Forces Income | | |

Other (pls. specify): _____

ESG Applicant Release: I hereby authorize the release of the following payment and/or benefit information.

ESG Applicant Signature: _____ Date: _____

Payment source representative to complete this section:

Payments or benefits in the amount of \$ _____ are paid on a _____ basis. The expected duration of the payments or benefits is _____.

Authorized Payment Source Representative Signature: _____ Date: _____

Name, Title: _____

Address and Phone: _____

SELF-DECLARATION OF INCOME

Applicant Name: _____

***This form should only be used if third party verification of income is unavailable. ESG providers are expected to have exhausted all alternative options for verifying income prior to use of a self-declaration of income.**

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: _____

Applicant Signature: _____ Date: _____

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

Applicant Signature: _____ Date: _____

Staff Verification

I understand that third-party verification is the preferred method of certifying income for HPRP 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:

Staff Signature: _____ Date: _____

EMERGENCY SOLUTIONS GRANTS (ESG) PROGRAM

SELF-DECLARATION OF HOUSING 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 head of 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] am/are currently homeless and living on the street (i.e. a car, park, abandoned building, bus station, airport, or camp ground).

I [and my children] am/are the victim(s) of domestic violence and am/are fleeing from abuse.

I [and my children] am/are being evicted from the housing we are presently staying in and must leave this housing within the next _____ days.

I [and my children] am/are at risk of being evicted from the housing we are presently staying in.

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: _____

Notice of Ineligibility for ESG Homelessness Prevention Assistance

Date: _____ Name: _____

Address, City and Zip: _____

Your household does not meet the minimum eligibility or qualification standards for ESG assistance for the reason(s) stated below. If you disagree with this decision, you have the right to an informal review (See below).

- Incomplete Documentation;** household failed to provide all required supporting documentation. Missing documentation was _____
- Over Income;** total household income exceeds program eligibility income limits. Maximum household income for your household is \$_____ and your income is \$_____
- Does not meet ESG guidelines for at risk of homelessness;** household does not have a writ of summary process and complaint
- No members of the household meet the additional criteria for ESG services;** history of homelessness, history of domestic violence, household member with disability
- Property Owner not willing to Participate;** household’s landlord refused to accept RAFT payments offered by Agency on behalf of the household.
- Receiving other benefits;** household is receiving other benefits of the same type at the same time
- Does not have sufficient financial resources to maintain the housing based on current income.**
- Other;** _____

Administrative Review: If you disagree with this decision, you have the right to request a review.

To request a review, you must send a written request **specifically** stating why you believe our determination is incorrect. This **written request** must be mailed or hand delivered within 10 calendar days of the notice of ineligibility and addressed to: *ESG Agency address*.

You may submit additional documentation or written arguments with your request for review. Reviews will be performed by a supervisor who is familiar with the program but unfamiliar with your particular case. Administrative Review is different from a hearing, no testimony will be taken so you must submit any additional documentation (i.e. increased income, etc.), and the explanation of your circumstance or legal argument with your request to have this information included in this review.

A written ESG review will be conducted within 15 calendar days of your request for a review. You will be notified at the address you provided and a written finding will be placed in your file. There is no appeal to the City of Worcester pending this finding.

RENT REASONABLENESS CHECKLIST AND 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:

A. Compliance with Payment Standard

$\underline{\hspace{2cm}}$ + $\underline{\hspace{2cm}}$ = $\underline{\hspace{2cm}}$
 Proposed Contract Rent Utility Allowance Proposed Gross Rent

Approved rent does not exceed applicable Payment Standard of

\$_____.

B. 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:
-------	------------	-------

ESG-RRHLLANDLORD ACKNOWLEDGEMENT FORM

Date: _____

This is to confirm that _____ will rent an
(Tenant's Name)

apartment from me at _____

_____ for a monthly rent amount of:

\$ _____. The start date for this tenancy will be: _____.

Number of Bedrooms _____ Year Constructed _____, (Prior to 1978) attached De-Lead Certification

Square Feet _____ Handicap Accessible Yes No

Type of House/Apartment: Elevator/High-Rise

Single Family Detached Semi Detached/Row House Manufactured Home Garden Walkup

Who is responsible for Utilities and Appliances? (Please Check One).

Utility	Landlord will pay	Tenant will pay
Heating		
Hot Water		
Gas		
Trash		
Electric		
Stove		
Refrigerator		

Rent Reasonable: Under Funding regulations, the program required that the landlord certify that the rent charged to the above named tenant is not more than the rent charged for other unassisted comparable units.

Address and Unit Number	Square Feet	# of Bedrooms	Handicap Accessible	Year Constructed	Date Rented	Rental Amount
			Y N			\$
			Y N			\$
			Y N			\$

Shallow Subsidy: If the tenant will be receiving short-term help towards his or her rent, I acknowledge receipt of the attached Shallow Subsidy Agreement. I understand a copy of this agreement is being provided to me for informational purposes only. It is not a guarantee of a subsidy. If a subsidy is put into place, it will be effective for up to 12 months. I understand that if the tenancy should end before the 12 months is up; the subsidy will also end at that time. I also understand that the subsidy is contingent upon the tenant's compliance with the program. I understand that this agreement is also contingent upon the unit's compliance with HUD habitability standards. I do agree to notify the case manager/contact identified below if tenant fails to remit rental payment within five (5) days of due date.

Landlord Contact Information: Address _____

Phone: _____ Fax: _____

Check Payable To: _____

Sincerely,

Signature _____ Date _____

(Landlord Signature)

ESG Housing Habitability Standards and Lead-Based Paint Inspection Checklist

The new ESG Shelter and Housing Standards are described in Section 576.403 of the ESG Interim Rule. These habitability standards **apply any time ESG funds are used to assist an ESG participant retain or move into a housing unit.** Inspections must be conducted upon initial assistance and then on an annual basis for the term of ESG assistance. In contract to the Housing Quality Standards (HQS), the habitability standards **do not require a certified inspector.** This checklist also addresses the ESG requirement on determining that a unit is in compliance with federal laws regarding lead based paint if the unit where an ESG participant household is residing/intends to reside was constructed prior to 1978 **and** the household includes a pregnant woman or a child under the age of 6. The ESG grantee must conduct the inspections using this form to document compliance.

Instructions: Mark each statement as 'A' for approved or 'D' for deficient. The property must meet all standards before ESG funds are authorized. The checklist must be kept in the ESG Participant's record.

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> 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> <p>b. 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.</p> <p>a. 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.</p>
	<p>12. Required in buildings constructed prior to 1978 and where an ESG participant household intends to reside and the household includes a child under the age of 6.</p> <p>Visual assessment means looking for, as applicable: (1) Deteriorated paint (chipping, loose, crumbling); (2) Visible surface paint dust, debris and residue as part of a risk assessment or clearance examination; and (3) The completion or failure of a hazard reduction measure.</p> <p>The <input type="checkbox"/> unit or non DHCD funded shelter has no observable loose, chipping, or deteriorated paint; or</p> <p>The landlord presented a report from a licensed inspector showing the site is lead free, or the lead has been <input type="checkbox"/> removed or encapsulated as required under MA state law. (If so, check this box)</p>

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.

ESG Participant Head of Household Name: Street

Address:

Apartment:

City:

State:

Zip:

Evaluator's Signature: _____

Date: _____

Please Print Evaluator Name: _____

Exec. Dir. Initials: _____

DRAFT

Emergency Solutions Grants (ESG) Performance Report

Project Sponsor:	Project Name:
Sponsor Address: City: State: Zip Code	
Contact Person: Email	Telephone #
Report for Period Ending: <input type="checkbox"/> June 30 th due July 15 th <input type="checkbox"/> September 30 th due October 15 th	
<input type="checkbox"/> December 30 th due January 15 th <input type="checkbox"/> March 31 st due April 15 th	

ESG Activity: Emergency

Shelter

Street Outreach

Homeless Prevention

Rapid Re-Housing

HMIS

ES

Day Shelter

Health Care Provider

Substance Abuse Program

Housing Search Program

Scattered Site

Legal Services

Mediation Services

Employment Services

HIV/AIDS Services

Child Care Services

Hotel/Motel/SRO/Group Home

Domestic Violence Services

Other _____

Accomplishment Narrative: Describe your ESG funded program's accomplishment for the year. (No more than 250 words)

Number Served:

A. Number Proposed to be Served on Scope of Work.	Number of singles not in families	Number of adults in families	Number of children in families	Number of families
Annually				
B. Number Served for the Program Year.	Number of singles not in families	Number of adults in families	Number of children in families	Number of families
Annually				

	Number of individuals	Number of families
C. Number on the first day of the program year.		

D. Number entering program during the program year.		
E. Number who exited the program during the program year.		

F. Number of Single Individuals Served	Male	Female	Total
Unaccompanied under 18			
Adults 18 to 25			
Adults over 25			
Total			

G. Families Served	Total
Two parent households with children	
Family households with no children	
Single parent household with children	
Households with all children	
Total	

Population Served: (total persons served)

A. Race:

Hispanic

(Please indicate if this person is of Hispanic/Latino origin)

American Indian/Alaskan Native		
Asian		
Black/African American		
Native Hawaiian/Other Pacific Islander		
White		
American Indian/Alaskan Native & White		
Asian & White		
Black/African American & White		
American Indian/Alaskan Native & Black/African American		
Other Multi-Racial		

B. Subpopulations Served: (only one category per persons served)

Chronically Homeless (emergency shelter only)	
Severely Mentally ill	
Chronic Substance Abuse	
Other Disability	
Persons with HIV/AIDS and related diseases	
Veterans	
Elderly	
Domestic violence	
Other (please specify)	

Reasons for service request (households served –includes individuals not in families and families served)

Eviction proceedings	
Loss of or sudden reduction in family income	

Divorce	
Change in Family Composition	
Unable to pay/rent/mortgage/utilities	
Argument with family /friends	
Family Violence	
Prison/Jail	
Welfare time Limits	
Physical/Mental Disability	
Alcohol/Drug Abuse	
Other :	

v. Destination at Exit: (households served –includes individuals not in families and families served)

Transitional housing	
Permanent housing	
Emergency shelter	
Institution (hospital, inpatient substance abuse treatment facility, jail/prison)	
Retained Tenancy/Housing	
Other (please specify)	
Unknown/disappeared	

vi. Services Provided (total served):

A. Homeless Assistance: (Please indicate total number served for the program year)

	Adults	Children
Outreach		
Life Skills		
Needs Assessments		
Child Care		
Transportation		
Job Training		
Assistance in obtaining income support		
Legal Services		
Food Pantry		
Case Management		
Client Advocacy		
Nutritional Services		
Alcohol/Drug Abuse Treatment		
Job Placement		
Housing Search		
Rapid Re-Housing		
Day Services		
Medical/Mental Health Services		
Other (please indicate)		

B. Homeless Prevention: (Please indicate total number served for the program year)

	Adults	Children
Rental Assistance		
Short Term Subsidies to defray rent and utility arrearages		
Security deposits or first month rent to enable them to move into permanent housing		
Utility Assistance		
Mediation Services for landlord/tenant disputes		
Legal services in eviction proceedings		
Diversion from Shelter		
Stabilization Services		
Tenancy Preservation		
Other (please indicate)		

Outcomes: (Using the projected numbers on the Scope of Work document, please indicate the progress for each goal achieved during the program year)

Outcomes:

A. Rapid-Re-Housing/Emergency Shelter: (households served –includes individuals not in families and families served during the contract period)

	%	#
Reduction of the number of households in shelter		
Reduction in average length of shelter stay		
Rapidly Re-Housed those entering the shelter system		
Placed into permanent affordable housing		
Provided stabilization services for those exiting shelter to permanent Housing		
Linked program participants to asset development resources that resulted in an increase in income (education, job training, employment, mainstream resources)		

B. Street Outreach (households served –includes individuals not in families and families served during the contract period)

	%	#
Reduced the Number of Unsheltered single adults in the Boston CoC		
Placed Unsheltered single adults into any type of housing		
Unsheltered Adults received a service for an identified physical or mental health condition for which they were not receiving services at program entry		

C. Homeless Prevention: (households served –includes individuals not in families and families served during the contract period)

	%	#
Diverted from Shelter		
Tenancies preserved		
Evictions prevented		
Provided stabilization Services for households at imminent risk of becoming homeless		
Linked program participants to asset development resources that resulted in an increase in income (education, job training, employment, mainstream resources)		
Provided Landlord-Tenant mediation		
Provided Financial Assistance		

VIII. Financial:
ESG Expenditures – By Component Type

Component Type	ESG Funds	Match	Match Source	Total Expenditures
Street Outreach				
Emergency Shelter				
Rapid Re-Housing				
Homelessness Prevention				
Total				

ESG Expenditures – By Service Type

Expenditure Type	ESG Funds	Match	Match Source	Total Expenditures
Emergency Shelter				
Day Shelter				
Health Care				
Substance Abuse Program				
Housing Search				
Street Outreach				
Meal Services				
Mental Health Services				
Employment Search				
Homeless Prevention				
Rapid Re-Housing				
Vouchers for Shelter				
Rental Assistance				
HIV/AIDS Services				
Child Care				
Financial Assistance				
Stabilization Services				
Moving Costs				
Total				

SUB-RECIPIENT MONTHLY/ QUARTERLY TIMESHEET

Please Select: **FISCAL YEAR 2016** **FISCAL YEAR 2017** **FISCAL YEAR 2018**

Please Select: **CDBG Program** **HOME Program** **ESG Program**

ORGANIZATION NAME: _____ **HOPWA**

PROGRAM NAME: _____ **CoC Program**

REQUEST PERIOD: _____ **TO:** _____ **PERCENTAGE RATE:** (According to Application) **0.00%**

Sub-Recipient / Employee Time Sheet for Program Personnel

EMPLOYEE NAME	ACTIVITY	DATE	PAY RATE	Day of Week (Week 1)							Total Number of Hours	Total Program Hours Worked	PROGRAM REIMBURSEABLE PAY
				M	T	Wed.	Th.	Fri.	Sa.	Su.			
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
Total Number of Hours Worked -											0.0	0.0	\$0.00

Total Number of Hours: 0.0

Total Number of Program Hours: 0.0

Rate of Pay Per Hour: \$0.00

Percentage Rate - According to Application: 0.0%

Total Pay Period 1 Amount: \$0.00

Sub-Recipient / Employee Time Sheet for Program Personnel

EMPLOYEE NAME	ACTIVITY	DATE	PAY RATE	Day of Week (Week 2)							Total Number of Hours	Total Program Hours Worked	PROGRAM REIMBURSEABLE PAY
				M	T	Wed.	Th.	Fri.	Sa.	Su.			
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
\$0.00				<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	0	0	\$0.00
Total Number of Hours Worked -											0.0	0.0	\$0.00

Total Number of Hours: 0.0

Total Number of Program Hours: 0.0

Rate of Pay Per Hour: \$0.00

Percentage Rate - According to Application: 0.0%

Total Pay Period 2 Amount: \$0.00

Date & Signature of Staff Personnel: _____ Signature: _____ Date: _____

Date & Signature of Staff Supervisor: _____ Signature: _____ Date: _____

*Note: Please be sure to attach the approved timesheets and pay stub together when submitting program reimbursements to the Executive Office of Economic Development for CDBG, HOME, ESG and/or HOPWA programs.

TIME AND EFFORT LOG

Employee's Name _____

Social Security # or Employee # _____ Pay Period Dates _____

	Funding Source 1	Funding Source 2	Funding Source 3	Funding Source 4	TOTALS
DAY					
1					
2					
3					
4					
5					
6					
7					
8					
9					
10					
11					
12					
13					
14					
15					
16					
17					
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28					
29					
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Employee's Signature/Date: _____

Supervisor's Signature/Date: _____



The City of
WORCESTER

Match Certification Emergency Solutions Grant Program

PROGRAM TYPE (check all that apply):

Emergency Shelter Street Outreach Homeless Prevention Rapid Re-Housing HMIS Administration

Sub-recipient Name _____ Project Name... _____

TOTAL GRANT AWARD: _____

Match Documentation

Match Source	Match Amount	Documentation Description

The undersigned individuals do, by their respective oaths solemnly swear and affirm as follows:

- That the Staff Member completing this Match Certification has verified the eligibility of the match item(s) to which this certification relates;
- That the Staff Member has reviewed the Federal Guidelines regarding the match requirement listed on page two of ESG-229 from the HUD ESG Interim Rule; and,
- That the Staff Member has verified that the funds used to Match the ESG Program are not being used to match any other grant;
- That the Staff Member has collected valid documentation of Match for which this certification relates; and,
- That the Executive Director has reviewed the Match documentation to which this Match Certification relates, and has verified that all the representations made by the Staff Member in this Match Certification are true and correct.

The undersigned individuals affirm, by penalty of perjury, that all the statements made herein are true and correct.

Staff Signature _____ Date _____

Staff Print Name _____

Executive Director Signature _____ Date _____

Executive Director Print Name _____

§576.201 Matching requirement.

(a) The recipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the recipient's fiscal year grant for ESG. This amount may include contributions to any project under the recipient's ESG program, including any subrecipient's ESG project, if the requirements in this section are met. The first \$100,000 of a State's fiscal year grant is not required to be matched, but the benefit of this exception must pass to the state's subrecipients that are least capable of providing matching contributions. The match requirements under this section do not apply if the recipient is a territory.

(b) To be recognized as match for ESG, each contribution must meet the requirements under 2 CFR 200.306, except that:

(1) Notwithstanding 2 CFR 200.306(b)(4), matching contributions are not subject to the expenditure limits in §576.100; and

(2) Notwithstanding 2 CFR 200.306(b)(5), the recipient may use funds from another Federal program as match for ESG, unless doing so would violate a specific statutory prohibition or the recipient or subrecipient counts ESG funds as match for that program.

(c) The recipient may count as match the value specified in 2 CFR 200.306(d) for any building the recipient or subrecipient donates for long-term use in the recipient's ESG program, provided that depreciation on the building is not counted as match or charged to any Federal award. If a third party donates a building to the recipient or subrecipient, the recipient may count as match either depreciation of the building and fair rental charges for the land for each year the building is used for the recipient's ESG program or, if the building is donated for long-term use in the recipient's ESG program, the fair market value of the capital assets, as specified in 2 CFR 200.306(h)(2), (i), and (j). To qualify as a donation for long-term use, the donation must be evidenced by a recorded deed or use restriction that is effective for at least 10 years after the donation date. If the donated building is renovated with ESG funds, the minimum period of use under §576.102(c) may increase the period for which the building must be used in the recipient's ESG program.

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

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

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

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

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

(3) Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

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

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

Please also refer to: 24 CFR Parts 91 and 576 [Docket No. FR-5474-I-01] RIN 2506-AC29

Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidated Plan Conforming Amendments

Electronic Code of Federal Regulations

e-CFR data is current as of June 26, 2018

[Title 24](#) → [Subtitle B](#) → [Chapter V](#) → [Subchapter C](#) → [Part 576](#)

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Title 24: Housing and Urban Development

PART 576—EMERGENCY SOLUTIONS GRANTS PROGRAM

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AUTHORITY: 12 U.S.C. 1701x, 1701 x-1; 42 U.S.C. 11371 *et seq.*, 42 U.S.C. 3535(d).

SOURCE: 76 FR 75974, Dec. 5, 2011, unless otherwise noted.

Subpart A—General Provisions

§576.1 Applicability and purpose.

This part implements the Emergency Solutions Grants (ESG) program authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371-11378). The program authorizes the Department of Housing and Urban Development (HUD) to make grants to States, units of general purpose local government, and territories for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re-housing assistance.

§576.2 Definitions.

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;

(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;

(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.

Consolidated plan means a plan prepared in accordance with 24 CFR part 91. An *approved consolidated plan* means a consolidated plan that has been approved by HUD in accordance with 24 CFR part 91.

Continuum of Care means the group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

Emergency shelter means any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. Any project funded as an emergency shelter under a Fiscal Year 2010 Emergency Solutions grant may continue to be funded under ESG.

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;
- (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;

(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.

Homeless Management Information System (HMIS) means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Metropolitan city means a city that was classified as a metropolitan city under 42 U.S.C. 5302(a) for the fiscal year immediately preceding the fiscal year for which ESG funds are made available. This term includes the District of Columbia.

Private nonprofit organization means a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Program income shall have the meaning provided in 2 CFR 200.80. Program income includes any amount of a security or utility deposit returned to the recipient or subrecipient.

Program participant means an individual or family who is assisted under ESG program.

Program year means the consolidated program year established by the recipient under 24 CFR part 91.

Recipient means any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.

State means each of the several States and the Commonwealth of Puerto Rico.

Subrecipient means a unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

Territory means each of the following: the Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands.

Unit of general purpose local government means any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

Urban county means a county that was classified as an urban county under 42 U.S.C. 5302(a) for the fiscal year immediately preceding the fiscal year for which ESG funds are made available.

Victim service provider means a private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women's shelters, domestic violence transitional housing programs, and other programs.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

§576.3 Allocation of funding.

(a) *Territories.* HUD will set aside for allocation to the territories up to 0.2 percent, but not less than 0.1 percent, of the total amount of each appropriation under this part in any fiscal year. HUD will allocate this set-aside amount to each territory based on its proportionate share of the total population of all territories and its rate of compliance with the most recent expenditure deadline under §576.203.

(b) *States, metropolitan cities, and urban counties.* HUD will allocate the amounts that remain after the set-aside to territories under paragraph (a) of this section to States, metropolitan cities, and urban counties, as follows:

(1) HUD will provide that the percentage of the total amount available for allocation to each State, metropolitan city, or urban county is equal to the percentage of the total amount available under section 106 of the Housing and Community Development Act of 1974 for the prior fiscal year that was allocated to that State, metropolitan city, or urban county.

(2) Except as otherwise provided by law, if the amount a metropolitan city or urban county would be allocated under paragraph (b)(1) is less than 0.05 percent of the total fiscal year appropriation for ESG, that amount will be added to the allocation for the State in which the city or county is located.

(c) *Notification of allocation amount.* HUD will notify each State, metropolitan city, urban county, and territory that is eligible to receive an allocation under this section of the amount of its allocation.

Subpart B—Program Components and Eligible Activities

§576.100 General provisions and expenditure limits.

(a) ESG funds may be used for five program components: street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS; as well as administrative activities. The five program components and the eligible activities that may be funded under each are set forth in §576.101 through §576.107. Eligible administrative activities are set forth in §576.108.

(b) The total amount of the recipient's fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed the greater of:

- (1) 60 percent of the recipient's fiscal year grant; or
- (2) The amount of Fiscal Year 2010 grant funds committed for homeless assistance activities.

(c) The total amount of ESG funds that may be used for administrative activities cannot exceed 7.5 percent of the recipient's fiscal year grant.

(d) Subject to the cost principles in 2 CFR part 200, subpart E, and other requirements in this part, employee compensation and other overhead costs directly related to carrying out street outreach, emergency shelter, homelessness prevention, rapid re-housing, and HMIS are eligible costs of those program components. These costs are not subject to the expenditure limit in paragraph (c) of this section.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

§576.101 Street outreach component.

(a) *Eligible costs.* Subject to the expenditure limit in §576.100(b), ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, nonfacility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term “unsheltered homeless people” means individuals and families who qualify as homeless under paragraph (1)(i) of the “homeless” definition under §576.2. The eligible costs and requirements for essential services consist of:

(1) *Engagement.* The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

(2) *Case management.* The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under §576.400(d); conducting the initial evaluation required under §576.401(a), including

verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

(3) *Emergency health services.* (i) Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

(iii) Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

(4) *Emergency mental health services.* (i) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

(iii) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances.

(iv) Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

(5) *Transportation.* The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

(i) The cost of a program participant's travel on public transportation;

(ii) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(iii) The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and

(iv) The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

(6) *Services for special populations.* ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence,

sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

(b) *Minimum period of use.* The recipient or subrecipient must provide services to homeless individuals and families for at least the period during which ESG funds are provided.

(c) *Maintenance of effort.* (1) If the recipient or subrecipient is a unit of general purpose local government, its ESG funds cannot be used to replace funds the local government provided for street outreach and emergency shelter services during the immediately preceding 12-month period, unless HUD determines that the unit of general purpose local government is in a severe financial deficit.

(2) Upon the recipient's request, HUD will determine whether the unit of general purpose local government is in a severe financial deficit, based on the recipient's demonstration of each of the following:

(i) The average poverty rate in the unit of general purpose local government's jurisdiction was equal to or greater than 125 percent of the average national poverty rate, during the calendar year for which the most recent data are available, as determined according to information from the U.S. Census Bureau.

(ii) The average per-capita income in the unit of general purpose local government's jurisdiction was less than 75 percent of the average national per-capita income, during the calendar year for which the most recent data are available, as determined according to information from the Census Bureau.

(iii) The unit of general purpose local government has a current annual budget deficit that requires a reduction in funding for services for homeless people.

(iv) The unit of general purpose local government has taken all reasonable steps to prevent a reduction in funding of services for homeless people. Reasonable steps may include steps to increase revenue generation, steps to maximize cost savings, or steps to reduce expenditures in areas other than services for homeless people.

§576.102 Emergency shelter component.

(a) *General.* Subject to the expenditure limit in §576.100(b), ESG funds may be used for costs of providing essential services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.

(1) *Essential services.* ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows:

(i) *Case management.* The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

(A) Using the centralized or coordinated assessment system as required under §576.400(d);

(B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility;

(C) Counseling;

(D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

(E) Monitoring and evaluating program participant progress;

(F) Providing information and referrals to other providers;

(G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

(H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(ii) *Child care.* The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(iii) *Education services.* When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

(iv) *Employment assistance and job training.* The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

(v) *Outpatient health services.* Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and noncosmetic dental care.

(vi) *Legal services.* (A) Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing.

(B) Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

(C) Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence,

sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

(D) Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

(E) Fees based on the actual service performed (*i.e.*, fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(F) Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

(vii) *Life skills training.* The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

(viii) *Mental health services.* (A) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.

(B) ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

(C) Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.

(D) Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(ix) *Substance abuse treatment services.* (A) Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.

(B) ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.

(C) Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

(x) *Transportation.* Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:

(A) The cost of a program participant's travel on public transportation;

(B) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;

(C) The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and

(D) The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

(xi) *Services for special populations.* ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

(2) *Renovation.* Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization.

(3) *Shelter operations.* Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

(4) *Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA).* Eligible costs are the costs of providing URA assistance under §576.408, including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. Persons that receive URA assistance are not considered “program participants” for the purposes of this part, and relocation payments and other URA assistance are not considered “rental assistance” or “housing relocation and stabilization services” for the purposes of this part.

(b) *Prohibition against involuntary family separation.* The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

(c) *Minimum period of use.* (1) *Renovated buildings.* Each building renovated with ESG funds must be maintained as a shelter for homeless individuals and families for not less than a period of 3 or 10 years, depending on the type of renovation and the value of the building. The “value of the building” is the reasonable monetary value assigned to the building, such as the value assigned by an independent real estate appraiser. The minimum use period must begin on the date the building is first occupied by a homeless individual or family after the completed renovation. A minimum period of use of 10 years, required for major rehabilitation and conversion, must be enforced by a recorded deed or use restriction.

(i) *Major rehabilitation.* If the rehabilitation cost of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation, the minimum period of use is 10 years.

(ii) *Conversion.* If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the minimum period of use is 10 years.

(iii) *Renovation other than major rehabilitation or conversion.* In all other cases where ESG funds are used for renovation, the minimum period of use is 3 years.

(2) *Essential services and shelter operations.* Where the recipient or subrecipient uses ESG funds solely for essential services or shelter operations, the recipient or subrecipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The recipient or subrecipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the recipient or subrecipient originally provided the services or shelter.

(d) *Maintenance of effort.* The maintenance of effort requirements under §576.101(c), which apply to the use of ESG funds for essential services related to street outreach, also apply for the use of such funds for essential services related to emergency shelter.

§576.103 Homelessness prevention component.

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in §576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in §576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in §576.105, the short-term and medium-term rental assistance requirements in §576.106, and the written standards and procedures established under §576.400.

§576.104 Rapid re-housing assistance component.

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as rapid re-housing assistance, may be provided to program participants who meet the criteria under paragraph (1) of the “homeless” definition in §576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in §576.105, the short- and medium-term rental assistance requirements in §576.106, and the written standards and procedures established under §576.400.

§576.105 Housing relocation and stabilization services.

(a) *Financial assistance costs.* Subject to the general conditions under §576.103 and §576.104, ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:

(1) *Rental application fees.* ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.

(2) *Security deposits.* ESG funds may pay for a security deposit that is equal to no more than 2 months' rent.

(3) *Last month's rent.* If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. This assistance must not exceed one month's rent and must be included in calculating the program participant's total rental assistance, which cannot exceed 24 months during any 3-year period.

(4) *Utility deposits.* ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed in paragraph (5) of this section.

(5) *Utility payments.* ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.

(6) *Moving costs.* ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance under paragraph (b) of this section and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.

(7) If a program participant receiving short- or medium-term rental assistance under §576.106 meets the conditions for an emergency transfer under 24 CFR 5.2005(e), ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer. These costs are not subject to the 24-month limit on rental assistance under §576.106.

(b) *Services costs.* Subject to the general restrictions under §576.103 and §576.104, ESG funds may be used to pay the costs of providing the following services:

(1) *Housing search and placement.* Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:

(i) Assessment of housing barriers, needs, and preferences;

(ii) Development of an action plan for locating housing;

(iii) Housing search;

(iv) Outreach to and negotiation with owners;

(v) Assistance with submitting rental applications and understanding leases;

(vi) Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;

(vii) Assistance with obtaining utilities and making moving arrangements; and

(viii) Tenant counseling.

(2) *Housing stability case management.* ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

(A) Using the centralized or coordinated assessment system as required under §576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;

(B) Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;

(C) Counseling;

(D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

(E) Monitoring and evaluating program participant progress;

(F) Providing information and referrals to other providers;

(G) Developing an individualized housing and service plan, including planning a path to permanent housing stability; and

(H) Conducting re-evaluations required under §576.401(b).

(3) *Mediation.* ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

(4) *Legal services.* ESG funds may pay for legal services, as set forth in §576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

(5) *Credit repair.* ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

(c) *Maximum amounts and periods of assistance.* The recipient may set a maximum dollar amount that a program participant may receive for each type of financial assistance under paragraph (a) of this section. The recipient may also set a maximum period for which a program participant may receive any of the types of assistance or services under this section. However, except for housing stability case management, the total period for which any program participant may receive the services under paragraph (b) of this section must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

(d) *Use with other subsidies.* Financial assistance under paragraph (a) of this section cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

(e) *Housing counseling.* Housing counseling, as defined in §5.100, that is funded with or provided in connection with ESG funds must be carried out in accordance with §5.111. When recipients or subrecipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of housing counseling, as defined in §5.100, and therefore are not required to be carried out in accordance with the certification requirements of §5.111

[76 FR 75974, Dec. 5, 2011., as amended at 81 FR 80808, Nov. 16, 2016; 81 FR 90659, Dec. 14, 2016]

§576.106 Short-term and medium-term rental assistance.

(a) *General provisions.* Subject to the general conditions under §576.103 and §576.104, the recipient or subrecipient may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance.

(1) Short-term rental assistance is assistance for up to 3 months of rent.

(2) Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.

(3) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.

(4) Rental assistance may be tenant-based or project-based, as set forth in paragraphs (h) and (i) of this section.

(b) *Discretion to set caps and conditions.* Subject to the requirements of this section, the recipient may set a maximum amount or percentage of rental assistance that a program participant may receive, a maximum number of months that a program participant may receive rental assistance, or a maximum number of times that a program participant may receive rental assistance. The recipient may also require program participants to share in the costs of rent.

(c) *Use with other subsidies.* Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources. Rental assistance may not be provided to a program participant who has been provided with replacement housing payments under the URA during the period of time covered by the URA payments.

(d) *Rent restrictions.* (1) Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD, as provided under 24 CFR part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.

(2) For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

(e) *Rental assistance agreement.* The recipient or subrecipient may make rental assistance payments only to an owner with whom the recipient or subrecipient has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the recipient or subrecipient a copy of any notice to the program participant to vacate the housing unit or any complaint used under State or local law to commence an eviction action against the program participant. Each rental assistance agreement that is executed or renewed on or after *December 16, 2016* must include all protections that apply to tenants and applicants under 24 CFR part 5, subpart L, as supplemented by §576.409, except for the emergency transfer plan requirements under 24 CFR 5.2005(e) and 576.409(d). If the housing is not assisted under another “covered housing program”, as defined in 24 CFR 5.2003, the agreement may provide that the owner's obligations under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), expire at the end of the rental assistance period.

(f) *Late payments.* The recipient or subrecipient must make timely payments to each owner in accordance with the rental assistance agreement. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The recipient or subrecipient is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

(g) *Lease.* Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the program participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks. For program participants living in housing with project-based rental assistance under paragraph (i) of this section, the lease must have an initial term of 1 year. Each lease executed on or after *December 16, 2016* must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under 24 CFR part 5, subpart L (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by 24 CFR 576.409, including the prohibited bases for eviction and restrictions on construing lease terms under 24 CFR 5.2005(b) and (c). If the housing is not assisted under another “covered housing program,” as defined in 24 CFR 5.2003, the lease provision or lease addendum may be written to expire at the end of the rental assistance period.

(h) *Tenant-based rental assistance.* (1) A program participant who receives tenant-based rental assistance may select a housing unit in which to live and may move to another unit or building and continue to receive rental assistance, as long as the program participant continues to meet the program requirements.

(2) The recipient may require that all program participants live within a particular area for the period in which the rental assistance is provided.

(3) The rental assistance agreement with the owner must terminate and no further rental assistance payments under that agreement may be made if:

(i) The program participant moves out of the housing unit for which the program participant has a lease;

(ii) The lease terminates and is not renewed; or

(iii) The program participant becomes ineligible to receive ESG rental assistance.

(i) *Project-based rental assistance.* If the recipient or subrecipient identifies a permanent housing unit that meets ESG requirements and becomes available before a program participant is identified to lease the unit, the recipient or subrecipient may enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent in accordance with the following requirements:

(1) The rental assistance agreement may cover one or more permanent housing units in the same building. Each unit covered by the rental assistance agreement ("assisted unit") may only be occupied by program participants, except as provided under paragraph (i)(4) of this section.

(2) The recipient or subrecipient may pay up to 100 percent of the first month's rent, provided that a program participant signs a lease and moves into the unit before the end of the month for which the first month's rent is paid. The rent paid before a program participant moves into the unit must not exceed the rent to be charged under the program participant's lease and must be included when determining that program participant's total rental assistance.

(3) The recipient or subrecipient may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant. When a program participant moves out of an assisted unit, the recipient or subrecipient may pay the next month's rent, *i.e.*, the first month's rent for a new program participant, as provided in paragraph (i)(2) of this section.

(4) The program participant's lease must not condition the term of occupancy to the provision of rental assistance payments. If the program participant is determined ineligible or reaches the maximum number of months over which rental assistance can be provided, the recipient or subrecipient must suspend or terminate the rental assistance payments for the unit. If the payments are suspended, the individual or family may remain in the assisted unit as permitted under the lease, and the recipient or subrecipient may resume payments if the individual or family again becomes eligible and needs further rental assistance. If the payments are terminated, the rental assistance may be transferred to another available unit in the same building, provided that the other unit meets all ESG requirements.

(5) The rental assistance agreement must have an initial term of one year. When a new program participant moves into an assisted unit, the term of the rental assistance agreement may be extended to cover the initial term of the program participant's lease. If the program participant's lease is renewed, the rental assistance agreement may be renewed or extended, as needed, up to the maximum number of months for which the program participant remains eligible. However, under no circumstances may the recipient or subrecipient commit ESG funds to be expended beyond the expenditure deadline in §576.203 or commit funds for a future ESG grant before the grant is awarded.

(j) *Changes in household composition.* The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

[76 FR 75974, Dec. 5, 2011,, as amended at 81 FR 80808, Nov. 16, 2016]

§576.107 HMIS component.

(a) *Eligible costs.* (1) The recipient or subrecipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:

(i) Purchasing or leasing computer hardware;

(ii) Purchasing software or software licenses;

(iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture;

(iv) Obtaining technical support;

(v) Leasing office space;

(vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;

(vii) Paying salaries for operating HMIS, including:

(A) Completing data entry;

(B) Monitoring and reviewing data quality;

(C) Completing data analysis;

(D) Reporting to the HMIS Lead;

(F) Training staff on using the HMIS or comparable database; and

(G) Implementing and complying with HMIS requirements;

(viii) Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act;

(ix) Paying staff travel costs to conduct intake; and

(x) Paying participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the Continuum of Care to operate the area's HMIS.

(2) If the recipient is the HMIS lead agency, as designated by the Continuum of Care in the most recent fiscal year Continuum of Care Homeless Assistance Grants Competition, it may also use ESG funds to pay the costs of:

(i) Hosting and maintaining HMIS software or data;

(ii) Backing up, recovering, or repairing HMIS software or data;

(iii) Upgrading, customizing, and enhancing the HMIS;

(iv) Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems;

(v) Administering the system;

(vi) Reporting to providers, the Continuum of Care, and HUD; and

(vii) Conducting training on using the system or a comparable database, including traveling to the training.

(3) If the subrecipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (*i.e.*, longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

(b) *General restrictions.* Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

§576.108 Administrative activities.

(a) *Eligible costs.* The recipient may use up to 7.5 percent of its ESG grant for the payment of administrative costs related to the planning and execution of ESG activities. This does not include staff and overhead costs directly related to carrying out activities eligible under §576.101 through §576.107, because those costs are eligible as part of those activities. Eligible administrative costs include:

(1) *General management, oversight and coordination.* Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient may either include the entire salary, wages, and related costs allocable to the program of each person whose *primary* responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes *any* program administration assignments. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

- (A) Preparing program budgets and schedules, and amendments to those budgets and schedules;
- (B) Developing systems for assuring compliance with program requirements;
- (C) Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities;
- (D) Monitoring program activities for progress and compliance with program requirements;
- (E) Preparing reports and other documents directly related to the program for submission to HUD;
- (F) Coordinating the resolution of audit and monitoring findings;
- (G) Evaluating program results against stated objectives; and
- (H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through (G) of this section.

(ii) Travel costs incurred for monitoring of subrecipients;

(iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and

(iv) Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.

(2) *Training on ESG requirements.* Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.

(3) *Consolidated plan.* Costs of preparing and amending the ESG and homelessness-related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91.

(4) *Environmental review.* Costs of carrying out the environmental review responsibilities under §576.407.

(b) *Sharing requirement.* (1) *States.* If the recipient is a State, the recipient must share its funds for administrative costs with its subrecipients that are units of general purpose local government. The amount shared must be reasonable under the circumstances. The recipient may share its funds for administrative costs with its subrecipients that are private nonprofit organizations.

(2) *Territories, metropolitan cities, and urban counties.* If the recipient is a territory, metropolitan city, or urban county, the recipient may share its funds for administrative costs with its subrecipients.

§576.109 Indirect costs.

(a) *In general.* ESG grant funds may be used to pay indirect costs in accordance with 2 CFR part 200, subpart E.

(b) *Allocation.* Indirect costs may be allocated to each eligible activity under §576.101 through §576.108, so long as that allocation is consistent with 2 CFR part 200, subpart E.

(c) *Expenditure limits.* The indirect costs charged to an activity subject to an expenditure limit under §576.100 must be added to the direct costs charged for that activity when determining the total costs subject to the expenditure limit.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

Subpart C—Award and Use of Funds

§576.200 Submission requirements and grant approval.

(a) *Application submission and approval.* In addition to meeting the application submission requirements in 24 CFR part 5, subpart K, each State, urban county, or metropolitan city must submit and obtain HUD approval of a consolidated plan in accordance with the requirements in 24 CFR part 91, and each territory must submit and obtain HUD approval of a consolidated plan in accordance with the requirements that apply to local governments under 24 CFR part 91. As provided under 2 CFR 200.207, HUD may impose special conditions or restrictions on a grant, if the recipient is determined to be high risk.

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

§576.201 Matching requirement.

(a) The recipient must make matching contributions to supplement the recipient's ESG program in an amount that equals the recipient's fiscal year grant for ESG. This amount may include contributions to any project under the recipient's ESG program, including any subrecipient's ESG project, if the requirements in this section are met. The first \$100,000 of a State's fiscal year grant is not required to be matched, but the benefit of this exception must pass to the state's subrecipients that are least capable of providing matching contributions. The match requirements under this section do not apply if the recipient is a territory.

(b) To be recognized as match for ESG, each contribution must meet the requirements under 2 CFR 200.306, except that:

(1) Notwithstanding 2 CFR 200.306(b)(4), matching contributions are not subject to the expenditure limits in §576.100; and

(2) Notwithstanding 2 CFR 200.306(b)(5), the recipient may use funds from another Federal program as match for ESG, unless doing so would violate a specific statutory prohibition or the recipient or subrecipient counts ESG funds as match for that program.

(c) The recipient may count as match the value specified in 2 CFR 200.306(d) for any building the recipient or subrecipient donates for long-term use in the recipient's ESG program, provided that depreciation on the building is not counted as match or charged to any Federal award. If a third party donates a building to the recipient or subrecipient, the recipient may count as match either depreciation of the building and fair rental charges for the land for each year the building is used for the recipient's ESG program or, if the building is donated for long-term use in the recipient's ESG program, the fair market value of the capital assets, as specified in 2 CFR 200.306(h)(2), (i), and (j). To qualify as a donation for long-term use, the donation must be evidenced by a recorded deed or use restriction that is effective for at least 10 years after the donation date. If the donated building is renovated with ESG funds, the minimum period of use under §576.102(c) may increase the period for which the building must be used in the recipient's ESG program.

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

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

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

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

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

(3) Some noncash contributions are real property, equipment, goods, or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.

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

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

§576.202 Means of carrying out grant activities.

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

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

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

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

§576.203 Obligation, expenditure, and payment requirements.

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

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

(2) *Funds allocated to metropolitan cities, urban counties, and territories.* Within 180 days after the date that HUD signs the grant agreement (or a grant amendment for reallocation of funds) with the metropolitan city, urban county, or territory, the recipient must obligate all the grant amount, except the amount for its administrative costs. This requirement is met by an agreement with, or a letter of award requiring payment to, a subrecipient; a procurement contract; or a written designation of a department within the government of the recipient to directly carry out an eligible activity. If the recipient is an urban county, this requirement may also be met with an agreement with, or letter of award requiring payment to, a member government, which has designated a department to directly carry out an eligible activity.

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

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

Subpart D—Reallocations

§576.300 In general.

(1) Funds not awarded by HUD due to failure by the recipient to submit and obtain HUD approval of a consolidated plan will be reallocated in accordance with §§576.301 through 576.303.

(2) Recaptured funds will be awarded by formula. In October and April each year, HUD will determine if the amount of recaptured funds is at least 30 percent of the most recent fiscal year appropriation. If so, HUD will amend all existing grants and reallocate the funds. If the amount is less than 30 percent of the most recent fiscal year appropriation, the funds will be reallocated in conjunction with the next fiscal year's allocation of funding.

§576.301 Metropolitan cities and urban counties.

Grant funds returned by a metropolitan city or urban county will be reallocated as follows:

(a) *Eligible recipient.* HUD will make the funds available to the State in which the city or county is located.

(b) *Notification of availability.* HUD will promptly notify the State of the availability of the amounts to be reallocated.

(c) *Application requirement.* Within 45 days after the date of notification, the State must submit to HUD a substantial amendment to its consolidated plan in accordance with 24 CFR part 91.

(d) *Restrictions that apply to reallocated amounts.* The same requirements that apply to grant funds allocated under §576.3 apply to grant funds reallocated under this section, except that the State must distribute the reallocated funds:

(1) To private nonprofit organizations and units of general purpose local government in the geographic area in which the metropolitan city or urban county is located;

(2) If funds remain, to private nonprofit organizations and units of general purpose local government located throughout the State.

§576.302 States.

Grant funds returned by a State will be reallocated as follows:

(a) *Eligible recipients.* HUD will make the funds available:

(1) To metropolitan cities and urban counties in the State that were not allocated funds under §576.3 because the amount they would have been allocated did not meet the minimum requirement under §576.3(b)(2);

(2) If funds remain, to county governments in the State other than urban counties;

(3) Then, if funds remain, to metropolitan cities and urban counties in the State that were allocated funds under §576.3.

(b) *Notification of availability.* HUD will notify eligible recipients of the availability of the funds by a notification letter or FEDERAL REGISTER notice, which will specify how the awards of funds will be made.

(c) *Application requirements.* Within 45 days after the date of notification, the eligible recipient must submit to HUD:

(1) A substantial amendment to its approved consolidated plan in accordance with 24 CFR part 91; or

(2) If the eligible recipient does not have an approved consolidated plan, an abbreviated consolidated plan that meets the requirements in the FEDERAL REGISTER notice or notification letter from HUD.

(d) *Restrictions that apply to reallocated amounts.* The same requirements that apply to grant funds allocated under §576.3 apply to grant funds reallocated under this section.

§576.303 Territories.

(a) *General.* Grant funds returned by a territory will be reallocated to other territories, then if funds remain, to States.

(b) *Allocation method.* The funds will be allocated as follows:

(1) For territories, the funds will be allocated among the territories in direct proportion with each territory's share of the total population of all of the eligible territories. If HUD determines that a territory failed to spend its funds in accordance with ESG requirements, then HUD may exclude the territory from the allocation of reallocation amounts under this section.

(2) For States, the funds will be allocated to each State in direct proportion with each State's share of the total amount of funds allocated to States under §576.3.

(c) *Notification of availability.* HUD will notify eligible recipients of the availability of the fund by a letter or FEDERAL REGISTER notice, which will specify how the awards of funds will be made.

(d) *Application requirements.* Within 45 days after the date of notification, the eligible recipient must submit to HUD a substantial amendment to its consolidated plan in accordance with 24 CFR part 91.

(e) *Restrictions that apply to reallocated amounts.* The same requirements that apply to grant funds allocated under §576.3 apply to grant funds reallocated under this section.

Subpart E—Program Requirements

§576.400 Area-wide systems coordination requirements.

(a) *Consultation with Continuums of Care.* The recipient must consult with each Continuum of Care that serves the recipient's jurisdiction in determining how to allocate ESG funds each program year; developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and developing funding, policies, and procedures for the administration and operation of the HMIS.

(b) *Coordination with other targeted homeless services.* The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the Continuum of Care or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness for that area. These programs include:

- (1) Shelter Plus Care Program (24 CFR part 582);
- (2) Supportive Housing Program (24 CFR part 583);
- (3) Section 8 Moderate Rehabilitation Program for Single Room Occupancy Program for Homeless Individuals (24 CFR part 882);
- (4) HUD—Veterans Affairs Supportive Housing (HUD-VASH) (division K, title II, Consolidated Appropriations Act, 2008, Pub. L. 110-161 (2007), 73 FR 25026 (May 6, 2008));
- (5) Education for Homeless Children and Youth Grants for State and Local Activities (title VII-B of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 *et seq.*));
- (6) Grants for the Benefit of Homeless Individuals (section 506 of the Public Health Services Act (42 U.S.C. 290aa-5));
- (7) Healthcare for the Homeless (42 CFR part 51c);
- (8) Programs for Runaway and Homeless Youth (Runaway and Homeless Youth Act (42 U.S.C. 5701 *et seq.*));
- (9) Projects for Assistance in Transition from Homelessness (part C of title V of the Public Health Service Act (42 U.S.C. 290cc-21 *et seq.*));
- (10) Services in Supportive Housing Grants (section 520A of the Public Health Service Act);
- (11) Emergency Food and Shelter Program (title III of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11331 *et seq.*));
- (12) Transitional Housing Assistance Grants for Victims of Sexual Assault, Domestic Violence, Dating Violence, and Stalking Program (section 40299 of the Violent Crime Control and Law Enforcement Act (42 U.S.C. 13975));
- (13) Homeless Veterans Reintegration Program (section 5(a)(1)) of the Homeless Veterans Comprehensive Assistance Act (38 U.S.C. 2021);
- (14) Domiciliary Care for Homeless Veterans Program (38 U.S.C. 2043);
- (15) VA Homeless Providers Grant and Per Diem Program (38 CFR part 61);

- (16) Health Care for Homeless Veterans Program (38 U.S.C. 2031);
- (17) Homeless Veterans Dental Program (38 U.S.C. 2062);
- (18) Supportive Services for Veteran Families Program (38 CFR part 62); and
- (19) Veteran Justice Outreach Initiative (38 U.S.C. 2031).

(c) *System and program coordination with mainstream resources.* The recipient and its subrecipients must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs for which families and individuals at risk of homelessness and homeless individuals and families may be eligible. Examples of these programs include:

- (1) Public housing programs assisted under section 9 of the U.S. Housing Act of 1937 (42 U.S.C. 1437g) (24 CFR parts 905, 968, and 990);
- (2) Housing programs receiving tenant-based or project-based assistance under section 8 of the U.S. Housing Act of 1937 (42 U.S.C. 1437f) (respectively 24 CFR parts 982 and 983);
- (3) Supportive Housing for Persons with Disabilities (Section 811) (24 CFR part 891);
- (4) HOME Investment Partnerships Program (24 CFR part 92);
- (5) Temporary Assistance for Needy Families (TANF) (45 CFR parts 260-265);
- (6) Health Center Program (42 CFR part 51c);
- (7) State Children's Health Insurance Program (42 CFR part 457);
- (8) Head Start (45 CFR chapter XIII, subchapter B);
- (9) Mental Health and Substance Abuse Block Grants (45 CFR part 96); and
- (10) Services funded under the Workforce Investment Act (29 U.S.C. 2801 *et seq.*).

(d) *Centralized or coordinated assessment.* Once the Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with requirements to be established by HUD, each ESG-funded program or project within the Continuum of Care's area must use that assessment system. The recipient and subrecipient must work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards required by paragraph (e) of this section. A victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system.

(e) *Written standards for providing ESG assistance.* (1) If the recipient is a metropolitan city, urban county, or territory, the recipient must have written standards for providing Emergency Solutions Grant (ESG) assistance and must consistently apply those standards for all program participants. The recipient must describe these standards in its consolidated plan.

- (2) If the recipient is a state:

(i) The recipient must establish and consistently apply, or require that its subrecipients establish and consistently apply, written standards for providing ESG assistance. If the written standards are established by the subrecipients, the recipient may require these written standards to be:

(A) Established for each area covered by a Continuum of Care or area over which the services are coordinated and followed by each subrecipient providing assistance in that area; or

(B) Established by each subrecipient and applied consistently within the subrecipient's program.

(ii) Written standards developed by the state must be included in the state's Consolidated Plan. If the written standards are developed by its subrecipients, the recipient must describe its requirements for the establishment and implementation of these standards in the state's Consolidated Plan.

(3) At a minimum these written standards must include:

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

(ii) Standards for targeting and providing essential services related to street outreach;

(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;

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

(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);

(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 (these policies must include the emergency transfer priority required under §576.409);

(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; and

(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.

(f) *Participation in HMIS.* The recipient must ensure that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient is a victim service provider or a legal services provider, it may use a comparable database that collects client-level data over time (*i.e.*, longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

[76 FR 75974, Dec. 5, 2011, as amended at 81 FR 80808, Nov. 16, 2016]

§576.401 Evaluation of program participant eligibility and needs.

(a) *Evaluations.* The recipient or its subrecipient must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under §576.400(d) and the written standards established under §576.400(e).

(b) *Re-evaluations for homelessness prevention and rapid re-housing assistance.* (1) The recipient or subrecipient must re-evaluate the program participant's eligibility and the types and amounts of assistance the program participant needs not less than once every 3 months for program participants receiving homelessness prevention assistance, and not less than once annually for program participants receiving rapid re-housing assistance. At a minimum, each re-evaluation of eligibility must establish that:

(i) The program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and

(ii) The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.

(2) The recipient or subrecipient may require each program participant receiving homelessness prevention or rapid re-housing assistance to notify the recipient or subrecipient regarding changes in the program participant's income or other circumstances (*e.g.*, changes in household composition) that affect the program participant's need for assistance under ESG. When notified of a relevant change, the recipient or subrecipient must re-evaluate the program participant's eligibility and the amount and types of assistance the program participant needs.

(c) *Annual income.* When determining the annual income of an individual or family, the recipient or subrecipient must use the standard for calculating annual income under 24 CFR 5.609.

(d) *Connecting program participants to mainstream and other resources.* The recipient and its subrecipients must assist each program participant, as needed, to obtain:

(1) Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and

(2) Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:

(i) Medicaid (42 CFR chapter IV, subchapter C):

(ii) Supplemental Nutrition Assistance Program (7 CFR parts 271-283);

(iii) Women, Infants and Children (WIC) (7 CFR part 246);

(iv) Federal-State Unemployment Insurance Program (20 CFR parts 601-603, 606, 609, 614-617, 625, 640, 650);

(v) Social Security Disability Insurance (SSDI) (20 CFR part 404);

(vi) Supplemental Security Income (SSI) (20 CFR part 416);

(vii) Child and Adult Care Food Program (42 U.S.C. 1766(t) (7 CFR part 226));

(viii) Other assistance available under the programs listed in §576.400(c).

(e) *Housing stability case management.* (1) While providing homelessness prevention or rapid rehousing assistance to a program participant, the recipient or subrecipient must:

(i) Require the program participant to meet with a case manager not less than once per month to assist the program participant in ensuring long-term housing stability; and

(ii) Develop a plan to assist the program participant to retain permanent housing after the ESG assistance ends, taking into account all relevant considerations, such as the program participant's current or expected income and expenses; other public or private assistance for which the program participant will be eligible and likely to receive; and the relative affordability of available housing in the area.

(2) The recipient or subrecipient is exempt from the requirement under paragraph (e)(1)(i) of this section if the Violence Against Women Act of 1994 (42 U.S.C. 13701 *et seq.*) or the Family Violence Prevention and Services Act (42 U.S.C. 10401 *et seq.*) prohibits that recipient or subrecipient from making its shelter or housing conditional on the participant's acceptance of services.

§576.402 Terminating assistance.

(a) *In general.* If a program participant violates program requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

(b) *Program participants receiving rental assistance or housing relocation and stabilization services.* To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

(1) Written notice to the program participant containing a clear statement of the reasons for termination;

(2) A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and

(3) Prompt written notice of the final decision to the program participant.

(c) *Ability to provide further assistance.* Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

§576.403 Shelter and housing standards.

(a) *Lead-based paint remediation and disclosure.* The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

(b) *Minimum standards for emergency shelters.* Any building for which Emergency Solutions Grant (ESG) funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards. The recipient may also establish standards that exceed or add to these minimum standards.

(1) *Structure and materials.* The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.

(2) *Access.* The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 *et seq.*) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 *et seq.*) and 28 CFR part 35; where applicable.

(3) *Space and security.* Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.

(4) *Interior air quality.* Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

(5) *Water supply.* The shelter's water supply must be free of contamination.

(6) *Sanitary facilities.* Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

(7) *Thermal environment.* The shelter must have any necessary heating/cooling facilities in proper operating condition.

(8) *Illumination and electricity.* The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

(9) *Food preparation.* Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

(10) *Sanitary conditions.* The shelter must be maintained in a sanitary condition.

(11) *Fire safety.* There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one

working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

(c) *Minimum standards for permanent housing.* The recipient or subrecipient cannot use ESG funds to help a program participant remain or move into housing that does not meet the minimum habitability standards provided in this paragraph (c). The recipient may also establish standards that exceed or add to these minimum standards.

(1) *Structure and materials.* The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.

(2) *Space and security.* Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.

(3) *Interior air quality.* Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.

(4) *Water supply.* The water supply must be free from contamination.

(5) *Sanitary facilities.* Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.

(6) *Thermal environment.* The housing must have any necessary heating/cooling facilities in proper operating condition.

(7) *Illumination and electricity.* The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.

(8) *Food preparation.* All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

(9) *Sanitary conditions.* The housing must be maintained in a sanitary condition.

(10) *Fire safety.* (i) There must be a second means of exiting the building in the event of fire or other emergency.

(ii) 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.

(iii) 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, community rooms, day care centers, hallways, stairwells, and other common areas.

§576.404 Conflicts of interest.

(a) *Organizational conflicts of interest.* The provision of any type or amount of ESG assistance may not be conditioned on an individual's or family's acceptance or occupancy of emergency shelter or housing owned by the recipient, the subrecipient, or a parent or subsidiary of the subrecipient. No

subrecipient may, with respect to individuals or families occupying housing owned by the subrecipient, or any parent or subsidiary of the subrecipient, carry out the initial evaluation required under §576.401 or administer homelessness prevention assistance under §576.103. Recipients and subrecipients must also maintain written standards of conduct covering organizational conflicts of interest required under 2 CFR 200.318.

(b) *Individual conflicts of interest.* For the procurement of goods and services, the recipient and its subrecipients must comply with 2 CFR 200.317 and 200.318. For all other transactions and activities, the following restrictions apply:

(1) *Conflicts prohibited.* No person described in paragraph (b)(2) of this section who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

(2) *Persons covered.* The conflict-of-interest provisions of paragraph (b)(1) of this section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of the recipient or its subrecipients.

(3) *Exceptions.* Upon the written request of the recipient, HUD may grant an exception to the provisions of this subsection on a case-by-case basis, taking into account the cumulative effects of the criteria in paragraph (b)(3)(ii) of this section, provided that the recipient has satisfactorily met the threshold requirements of paragraph (b)(3)(i) of this section.

(i) *Threshold requirements.* HUD will consider an exception only after the recipient has provided the following documentation:

(A) If the recipient or subrecipient is a government, disclosure of the nature of the conflict, accompanied by an assurance that there has been public disclosure of the conflict and a description of how the public disclosure was made; and

(B) An opinion of the recipient's attorney that the interest for which the exception is sought would not violate state or local law.

(ii) *Factors to be considered for exceptions.* In determining whether to grant a requested exception after the recipient has satisfactorily met the threshold requirements under paragraph (b)(3)(i) of this section, HUD must conclude that the exception will serve to further the purposes of the ESG program and the effective and efficient administration of the recipient's or subrecipient's program or project, taking into account the cumulative effect of the following factors, as applicable:

(A) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;

(B) Whether an opportunity was provided for open competitive bidding or negotiation;

(C) Whether the affected person has withdrawn from his or her functions, responsibilities or the decision-making process with respect to the specific activity in question;

(D) Whether the interest or benefit was present before the affected person was in the position described in paragraph (b)(1) of this section;

(E) Whether undue hardship results to the recipient, the subrecipient, or the person affected, when weighed against the public interest served by avoiding the prohibited conflict; and

(F) Any other relevant considerations.

(c) *Contractors.* All contractors of the recipient or subrecipient must comply with the same requirements that apply to subrecipients under this section.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015]

§576.405 Homeless participation.

(a) Unless the recipient is a State, the recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).

(b) If the recipient is unable to meet requirement under paragraph (a), it must instead develop and implement a plan to consult with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG). The plan must be included in the annual action plan required under 24 CFR 91.220.

(c) To the maximum extent practicable, the recipient or subrecipient must involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

§576.406 Equal participation of faith-based organizations.

The HUD program requirements in §5.109 of this title apply to the ESG program, including the requirements regarding disposition and change in use of real property by a faith-based organization.

[81 FR 19418, Apr. 4, 2016]

§576.407 Other Federal requirements.

(a) *General.* The requirements in 24 CFR part 5, subpart A are applicable, including the nondiscrimination and equal opportunity requirements at 24 CFR 5.105(a) and the housing counseling requirements at 24 CFR 5.111. Section 3 of the Housing and Urban Development Act of 1968, 12 U.S.C. 1701u, and implementing regulations at 24 CFR part 135 apply, except that homeless individuals have priority over other Section 3 residents in accordance with §576.405(c).

(b) *Affirmative outreach.* The recipient or subrecipient must make known that use of the facilities, assistance, and services are available to all on a nondiscriminatory basis. If it is unlikely that the procedures that the recipient or subrecipient intends to use to make known the availability of the facilities, assistance, and services will reach persons of any particular race, color, religion, sex, age, national origin, familial status, or disability who may qualify for those facilities and services, the recipient or subrecipient must establish additional procedures that ensure that those persons are made aware of the

facilities, assistance, and services. The recipient and its subrecipients must take appropriate steps to ensure effective communication with persons with disabilities including, but not limited to, adopting procedures that will make available to interested persons information concerning the location of assistance, services, and facilities that are accessible to persons with disabilities. Consistent with Title VI and Executive Order 13166, recipients and subrecipients are also required to take reasonable steps to ensure meaningful access to programs and activities for limited English proficiency (LEP) persons.

(c) *Uniform requirements.* The requirements of 2 CFR part 200 apply to the recipient and subrecipients, and:

(1) Program income may be used as matching contributions, subject to the requirements in §576.201;

(2) The disposition of real property for which ESG funds are used for major rehabilitation, conversion, or other renovation under §576.102 is governed by the minimum period of use requirements under §576.102(c).

(d) *Environmental review responsibilities.* (1) Activities under this part are subject to environmental review by HUD under 24 CFR part 50. The recipient shall supply all available, relevant information necessary for HUD to perform for each property any environmental review required by 24 CFR part 50. The recipient also shall carry out mitigating measures required by HUD or select alternate eligible property. HUD may eliminate from consideration any application that would require an Environmental Impact Statement (EIS).

(2) The recipient or subrecipient, or any contractor of the recipient or subrecipient, may not acquire, rehabilitate, convert, lease, repair, dispose of, demolish, or construct property for a project under this part, or commit or expend HUD or local funds for eligible activities under this part, until HUD has performed an environmental review under 24 CFR part 50 and the recipient has received HUD approval of the property.

(e) *Davis-Bacon Act.* The provisions of the Davis-Bacon Act (40 U.S.C. 276a to 276a-5) do not apply to the ESG program.

(f) *Procurement of Recovered Materials.* The recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

[76 FR 75974, Dec. 5, 2011, as amended at 80 FR 75939, Dec. 7, 2015; 81 FR 90660, Dec. 14, 2016]

§576.408 Displacement, relocation, and acquisition.

(a) *Minimizing displacement.* Consistent with the other goals and objectives of Emergency Solutions Grant (ESG), the recipient and its subrecipients must assure that they have taken all reasonable steps to minimize the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) as a result of a project assisted under Emergency Solutions Grant (ESG).

(b) *Temporary relocation not permitted.* No tenant-occupant of housing (a dwelling unit) that is converted into an emergency shelter may be required to relocate temporarily for a project assisted with ESG funds, or be required to move to another unit in the same building/complex. When a tenant moves

for a project assisted with ESG funds under conditions that trigger the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA), 42 U.S.C. 4601-4655, as described in paragraph (c) of this section, the tenant should be treated as permanently displaced and offered relocation assistance and payments consistent with that paragraph.

(c) *Relocation assistance for displaced persons.* (1) *In general.* A displaced person (defined in paragraph (c)(2) of this section) must be provided relocation assistance at the levels described in, and in accordance with, the URA and 49 CFR part 24. A displaced person must be advised of his or her rights under the Fair Housing Act (42 U.S.C. 3601 *et seq.*). Whenever possible, minority persons shall be given reasonable opportunities to relocate to comparable and suitable decent, safe, and sanitary replacement dwellings, not located in an area of minority concentration, that are within their financial means. This policy, however, does not require providing a person a larger payment than is necessary to enable a person to relocate to a comparable replacement dwelling. (See 49 CFR 24.205(c)(2)(ii)(D).) As required by Section 504 of the Rehabilitation Act (29 U.S.C. 794) and 49 CFR part 24, replacement dwellings must also contain the accessibility features needed by displaced persons with disabilities.

(2) *Displaced Person.* (i) For purposes of paragraph (c) of this section, the term “displaced person” means any person (family, individual, business, nonprofit organization, or farm, including any corporation, partnership, or association) that moves from real property, or moves personal property from real property, permanently, as a direct result of acquisition, rehabilitation, or demolition for a project assisted under the ESG program. This includes any permanent, involuntary move for an assisted project, including any permanent move from the real property that is made:

(A) After the owner (or person in control of the site) issues a notice to move permanently from the property or refuses to renew an expiring lease, if the move occurs on or after:

(I) The date of the submission by the recipient (or subrecipient, as applicable) of an application for assistance to HUD (or the recipient, as applicable) that is later approved and funded if the recipient (or subrecipient, as applicable) has site control as evidenced by a deed, sales contract, or option contract to acquire the property; or

(II) The date on which the recipient (or subrecipient, as applicable) selects the applicable site, if the recipient (or subrecipient, as applicable) does not have site control at the time of the application, provided that the recipient (or subrecipient, as applicable) eventually obtains control over the site;

(B) Before the date described in paragraph (c)(2)(i)(A) of this section, if the recipient or HUD determines that the displacement resulted directly from acquisition, rehabilitation, or demolition for the project; or

(C) By a tenant-occupant of a dwelling unit and the tenant moves after execution of the agreement covering the acquisition, rehabilitation, or demolition of the property for the project.

(ii) Notwithstanding paragraph (c)(2)(i) of this section, a person does not qualify as a displaced person if:

(A) The person has been evicted for cause based upon a serious or repeated violation of the terms and conditions of the lease or occupancy agreement; violation of applicable Federal, State or local law, or other good cause; and the recipient determines that the eviction was not undertaken for the purpose of evading the obligation to provide relocation assistance.

(B) The person moved into the property after the submission of the application but, before signing a lease and commencing occupancy, was provided written notice of the project, its possible impact on the person (*e.g.*, the person may be displaced), and the fact that the person would not qualify as a “displaced person” (or for any assistance under this section) as a result of the project;

(C) The person is ineligible under 49 CFR 24.2(a)(9)(ii); or

(D) HUD determines that the person was not displaced as a direct result of acquisition, rehabilitation, or demolition for the project.

(iii) The recipient or subrecipient may, at any time, request that HUD to determine whether a displacement is or would be covered by this rule.

(3) *Initiation of negotiations.* For purposes of determining the type of replacement housing payment assistance to be provided to a displaced person pursuant to this section:

(i) If the displacement is the direct result of privately undertaken rehabilitation, demolition, or acquisition of the real property, "initiation of negotiations" means the execution of the agreement between the recipient and the subrecipient or the agreement between the recipient (or subrecipient, as applicable) and the person owning or controlling the property;

(ii) If site control is only evidenced by an option contract to acquire the property, the "initiation of negotiations" does not become effective until the execution of a written agreement that creates a legally enforceable commitment to proceed with the purchase, such as a sales contract.

(d) *Real property acquisition requirements.* The acquisition of real property, whether funded privately or publicly, for a project assisted with Emergency Solutions Grant (ESG) funds is subject to the URA and Federal governmentwide regulations at 49 CFR part 24, subpart B.

(e) *Appeals.* A person who disagrees with the recipient's (or subrecipient's, if applicable) determination concerning whether the person qualifies as a displaced person, or the amount of relocation assistance for which the person may be eligible, may file a written appeal of that determination with the recipient under 49 CFR 24.10. A low-income person who disagrees with the recipient's determination may submit a written request for review of that determination by the appropriate HUD field office.

§576.409 Protection for victims of domestic violence, dating violence, sexual assault, or stalking.

(a) *Applicability of VAWA protections.* The core statutory protections of VAWA that prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking applied upon enactment of VAWA 2013 on March 7, 2013. The VAWA regulatory requirements under 24 CFR part 5, subpart L, as supplemented by this section, apply to all eligibility and termination decisions that are made with respect to ESG rental assistance on or after *December 16, 2016*. The recipient must ensure that the requirements under 24 CFR part 5, subpart L, are included or incorporated into rental assistance agreements and leases as provided in §576.106(e) and (g).

(b) *Covered housing provider.* For the ESG program, "covered housing provider," as such term is used in HUD's regulations in 24 CFR part 5, subpart L, refers to:

(1) The recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2005(e);

(2) The housing owner for the purposes of 24 CFR 5.2005(d)(1), (d)(3), and (d)(4) and 5.2009(a);

(3) The housing owner and the recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2005(d)(2); and

(4) The housing owner and the recipient or subrecipient that administers the rental assistance for the purposes of 24 CFR 5.2007. However, the recipient or subrecipient may limit documentation requests under 24 CFR 5.2007 to only the recipient or subrecipient, provided that:

(i) This limitation is made clear in both the notice described under 24 CFR 5.2005(a)(1) and the rental assistance agreement;

(ii) The entity designated to receive documentation requests determines whether the program participant is entitled to protection under VAWA and immediately advise the program participant of the determination; and

(iii) If the program participant is entitled to protection, the entity designated to receive documentation requests must notify the owner in writing that the program participant is entitled to protection under VAWA and work with the owner on the program participant's behalf. Any further sharing or disclosure of the program participant's information will be subject to the requirements in 24 CFR 5.2007.

(c) *Notification.* As provided under 24 CFR 5.2005(a) each recipient or subrecipient that determines eligibility for or administers ESG rental assistance is responsible for ensuring that the notice and certification form described under 24 CFR 5.2005(a)(1) is provided to each applicant for ESG rental assistance and each program participant receiving ESG rental assistance at each of the following times:

- (1) When an individual or family is denied ESG rental assistance;
- (2) When an individual or family's application for a unit receiving project-based rental assistance is denied;
- (3) When a program participant begins receiving ESG rental assistance;
- (4) When a program participant is notified of termination of ESG rental assistance; and
- (5) When a program participant receives notification of eviction.

(d) *Emergency transfer plan.* (1) The recipient must develop the emergency transfer plan under 24 CFR 5.2005(e) or, if the recipient is a state, require its subrecipients that administer ESG rental assistance to develop the emergency transfer plan(s) required under 24 CFR 5.2005(e). If the state's subrecipients are required to develop the plan(s), the recipient must specify whether an emergency transfer plan is to be developed for:

- (i) The state as a whole;
- (ii) Each area within the state that is covered by a Continuum of Care; or
- (iii) Each subrecipient that administers ESG rental assistance.

(2) Once the applicable plan is developed in accordance with this section, the recipient and each subrecipient that administers ESG rental assistance must implement the plan in accordance with 24 CFR 5.2005(e).

(3) Each emergency transfer plan must meet the requirements in 24 CFR 5.2005(e) and include the following program requirements:

(i) For families living in units receiving project-based rental assistance (assisted units), the required policies must provide that if a program participant qualifies for an emergency transfer, but a safe unit is not immediately available for an internal emergency transfer, that program participant shall have priority over all other applicants for tenant-based rental assistance, utility assistance, and units for which project-based rental assistance is provided.

(ii) For families receiving tenant-based rental assistance, the required policies must specify what will happen with respect to the non-transferring family member(s), if the family separates in order to effect an emergency transfer.

(e) *Bifurcation*. For the purposes of this part, the following requirements shall apply in place of the requirements at 24 CFR 5.2009(b):

(1) When a family receiving tenant-based rental assistance separates under 24 CFR 5.2009(a), the family's tenant-based rental assistance and utility assistance, if any, shall continue for the family member(s) who are not evicted or removed.

(2) If a family living in a unit receiving project-based rental assistance separates under 24 CFR 5.2009(a), the family member(s) who are not evicted or removed can remain in the assisted unit without interruption to the rental assistance or utility assistance provided for the unit.

(f) *Emergency shelters*. The following requirements apply to emergency shelters funded under §576.102:

(1) No individual or family may be denied admission to or removed from the emergency shelter on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy.

(2) The terms “affiliated individual,” “dating violence,” “domestic violence,” “sexual assault,” and “stalking” are defined in 24 CFR 5.2003.

[81 FR 80808, Nov. 16, 2016]

Subpart F—Grant Administration

§576.500 Recordkeeping and reporting requirements.

(a) *In general*. The recipient must have policies and procedures to ensure the requirements of this part are met, including those required by 2 CFR part 200. The policies and procedures must be established in writing and implemented by the recipient and its subrecipients to ensure that ESG funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the recipient and HUD to determine whether ESG requirements are being met.

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

worker observations if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made; and if the HMIS prevents overrides or changes of the dates on which entries are made.

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

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

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

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

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

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

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

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

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

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

(4) If the individual or family qualifies as homeless under paragraph (3) of the homeless definition in §576.2, because the individual or family does not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute or section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), the evidence must include:

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

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

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

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

(5) If the individual or family qualifies under paragraph (4) of the homeless definition in §576.2, because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other housing. If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household; or a certification by the intake worker. Otherwise, the oral statement that the individual or head of household seeking assistance has not identified a subsequent residence and lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain housing must be documented by a certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The

written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

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

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

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

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

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

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

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

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

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

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

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

(C) To the extent that source documents and third-party verification are unobtainable, a written statement by the recipient's or subrecipient's intake staff that the staff person has visited the applicant's residence and determined that the applicant meets one or more of the criteria under paragraph (1)(iii) of

the definition or, if a visit is not practicable or relevant to the determination, a written statement by the recipient's or subrecipient's intake staff describing the efforts taken to obtain the required evidence; or

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

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

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

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

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

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

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

(f) *Program participant records.* In addition to evidence of homeless status or "at risk of homelessness" status, as applicable, records must be kept for each program participant that document:

(1) The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;

(2) Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities provisions at §576.101 through §576.106, the provision on determining eligibility and amount and type of assistance at §576.401(a) and (b), and the provision on using appropriate assistance and services at §576.401(d) and (e); and

(3) Where applicable, compliance with the termination of assistance requirement in §576.402.

(g) *Centralized or coordinated assessment systems and procedures.* The recipient and its subrecipients must keep documentation evidencing the use of, and written intake procedures for, the

centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

(h) *Rental assistance agreements and payments.* The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

(i) *Utility allowance.* The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

(j) *Shelter and housing standards.* The records must include documentation of compliance with the shelter and housing standards in §576.403, including inspection reports.

(k) *Emergency shelter facilities.* The recipient must keep records of the emergency shelters assisted under the ESG program, including the amount and type of assistance provided to each emergency shelter. As applicable, the recipient's records must also include documentation of the value of the building before the rehabilitation of an existing emergency shelter or after the conversion of a building into an emergency shelter and copies of the recorded deed or use restrictions.

(l) *Services and assistance provided.* The recipient must keep records of the types of essential services, rental assistance, and housing stabilization and relocation services provided under the recipient's program and the amounts spent on these services and assistance. The recipient and its subrecipients that are units of general purpose local government must keep records to demonstrate compliance with the maintenance of effort requirement, including records of the unit of the general purpose local government's annual budgets and sources of funding for street outreach and emergency shelter services.

(m) *Coordination with Continuum(s) of Care and other programs.* The recipient and its subrecipients must document their compliance with the requirements of §576.400 for consulting with the Continuum(s) of Care and coordinating and integrating ESG assistance with programs targeted toward homeless people and mainstream service and assistance programs.

(n) *HMIS.* The recipient must keep records of the participation in HMIS or a comparable database by all projects of the recipient and its subrecipients.

(o) *Matching.* The recipient must keep records of the source and use of contributions made to satisfy the matching requirement in §576.201. The records must indicate the particular fiscal year grant for which each matching contribution is counted. The records must show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

(p) *Conflicts of interest.* The recipient and its subrecipients must keep records to show compliance with the organizational conflicts-of-interest requirements in §576.404(a), a copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in §576.404(b), and records supporting exceptions to the personal conflicts of interest prohibitions.

(q) *Homeless participation.* The recipient must document its compliance with the homeless participation requirements under §576.405.

(r) *Faith-based activities.* The recipient and its subrecipients must document their compliance with the faith-based activities requirements under §576.406.

(s) *Other Federal requirements.* The recipient and its subrecipients must document their compliance with the Federal requirements in §576.407 and §576.409, as applicable, including:

(1) Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under §576.407(a) and the affirmative outreach requirements in §576.407(b), including:

(i) Data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds; and

(ii) Documentation required under 24 CFR 5.168 in regard to the recipient's Assessment of Fair Housing and the certification that the recipient will affirmatively further fair housing.

(2) Records demonstrating compliance with the uniform administrative requirements in 2 CFR part 200.

(3) Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.

(4) Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.

(5) Data on emergency transfers requested under §576.409, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.

(t) *Relocation.* The records must include documentation of compliance with the displacement, relocation, and acquisition requirements in §576.408.

(u) *Financial records.* (1) The recipient must retain supporting documentation for all costs charged to the ESG grant.

(2) The recipient and its subrecipients must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under §§576.101 through 576.109, financial management in 2 CFR 200.302, and the cost principles in 2 CFR part 200, subpart E.

(3) The recipient and its subrecipients must retain records of the receipt and use of program income.

(4) The recipient must keep documentation of compliance with the expenditure limits in §576.100 and the expenditure deadline in §576.203.

(v) *Subrecipients and contractors.* (1) The recipient must retain copies of all solicitations of and agreements with subrecipients, records of all payment requests by and dates of payments made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable. If the recipient is a State, the recipient must keep records of each recapture and distribution of recaptured funds under §576.501.

(2) The recipient and its subrecipients must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 2 CFR part 200, subpart D.

(3) The recipient must ensure that its subrecipients comply with the recordkeeping requirements specified by the recipient and HUD notice or regulations.

(w) *Other records specified by HUD.* The recipient must keep other records specified by HUD.

(x) *Confidentiality.* (1) The recipient and its subrecipients must develop and implement written procedures to ensure:

(i) All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;

(ii) The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and

(iii) The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of the recipient or subrecipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

(2) The confidentiality procedures of the recipient and its subrecipients must be in writing and must be maintained in accordance with this section.

(y) *Period of record retention.* All records pertaining to each fiscal year of ESG funds must be retained for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

(1) Documentation of each program participant's qualification as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served;

(2) Where ESG funds are used for the renovation of an emergency shelter involves costs charged to the ESG grant that exceed 75 percent of the value of the building before renovation, records must be retained until 10 years after the date that ESG funds are first obligated for the renovation; and

(3) Where ESG funds are used to convert a building into an emergency shelter and the costs charged to the ESG grant for the conversion exceed 75 percent of the value of the building after conversion, records must be retained until 10 years after the date that ESG funds are first obligated for the conversion.

(z) *Access to records.* (1) *Federal Government rights.* Notwithstanding the confidentiality procedures established under paragraph (x) of this section, the recipient and its subrecipients must comply with the requirements for access to records in 2 CFR 200.336.

(2) *Public rights.* The recipient must provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligations of confidentiality and the confidentiality requirements in this part) to records regarding any uses of ESG funds the recipient received during the preceding 5 years.

(aa) *Reports.* The recipient must collect and report data on its use of ESG funds in the Integrated Disbursement and Information System (IDIS) and other reporting systems, as specified by HUD. The recipient must also comply with the reporting requirements in 2 CFR part 200 and 24 CFR part 91 and the reporting requirements under the Federal Funding Accountability and Transparency Act of 2006, (31 U.S.C. 6101 note), which are set forth in appendix A to 2 CFR part 170.

§576.501 Enforcement.

(a) *Performance reviews.* (1) HUD will review the performance of each recipient in carrying out its responsibilities under this part whenever determined necessary by HUD, but at least annually. In conducting performance reviews, HUD will rely primarily on information obtained from the records and reports from the recipient and, when appropriate, its subrecipients, as well as information from onsite monitoring, audit reports, and information from IDIS and HMIS. Where applicable, HUD may also consider relevant information pertaining to the recipient's performance gained from other sources, including citizen comments, complaint determinations, and litigation. Reviews to determine compliance with specific requirements of this part will be conducted as necessary, with or without prior notice to the recipient.

(2) If HUD determines preliminarily that the recipient or one of its subrecipients has not complied with an ESG program requirement, HUD will give the recipient notice of this determination and an opportunity to demonstrate, within the time prescribed by HUD and on the basis of substantial facts and data, that the recipient has complied with Emergency Solutions Grant (ESG) requirements. HUD may change the method of payment to require the recipient to obtain HUD's prior approval each time the recipient draws down Emergency Solutions Grant (ESG) funds. To obtain prior approval, the recipient may be required to manually submit its payment requests and supporting documentation to HUD in order to show that the funds to be drawn down will be expended on eligible activities in accordance with all ESG program requirements.

(3) If the recipient fails to demonstrate to HUD's satisfaction that the activities were carried out in compliance with ESG program requirements, HUD will take one or more of the remedial actions or sanctions specified in paragraph (b) of this section.

(b) *Remedial actions and sanctions.* Remedial actions and sanctions for a failure to meet an ESG program requirement will be designed to prevent a continuation of the deficiency; mitigate, to the extent possible, its adverse effects or consequences; and prevent its recurrence.

(1) HUD may instruct the recipient to submit and comply with proposals for action to correct, mitigate, and prevent noncompliance with ESG requirements, including:

(i) Preparing and following a schedule of actions for carrying out activities affected by the noncompliance, including schedules, timetables, and milestones necessary to implement the affected activities;

(ii) Establishing and following a management plan that assigns responsibilities for carrying out the remedial actions;

(iii) Canceling or revising activities likely to be affected by the noncompliance, before expending ESG funds for the activities;

(iv) Reprogramming ESG funds that have not yet been expended from affected activities to other eligible activities;

(v) Suspending disbursement of ESG funds for some or all activities;

(vi) Reducing or terminating the remaining grant of a subrecipient and reallocating those funds to other subrecipients; and

(vii) Making matching contributions before or as draws are made from the recipient's ESG grant.

(2) HUD may change the method of payment to a reimbursement basis.

(3) HUD may suspend payments to the extent HUD deems it necessary to preclude the further expenditure of funds for affected activities.

(4) HUD may remove the recipient from participation in reallocations of funds under subpart D of this part.

(5) HUD may deny matching credit for all or part of the cost of the affected activities and require the recipient to make further matching contributions to make up for the contribution determined to be ineligible.

(6) HUD may require the recipient to reimburse its line of credit in an amount equal to the funds used for the affected activities.

(7) HUD may reduce or terminate the remaining grant of a recipient and reallocate those funds to other recipients in accordance with subpart D of this part.

(8) HUD may condition a future grant.

(9) HUD may take other remedies that are legally available.

(c) *Recipient sanctions.* If the recipient determines that a subrecipient is not complying with an ESG program requirement or its subgrant agreement, the recipient must take appropriate actions, as prescribed for HUD in paragraphs (a) and (b) of this section. If the recipient is a State and funds become available as a result of an action under this section, the recipient must reallocate those funds to other subrecipients as soon as practicable. If the recipient is a unit of general purpose local government of territory, it must either reallocate those funds to other subrecipients or reprogram the funds for other activities to be carried out by the recipient as soon as practicable. The recipient must amend its Consolidated Plan in accordance with its citizenship participation plan if funds become available and are reallocated or reprogrammed under this section. The reallocated or reprogrammed funds must be used by the expenditure deadline in §576.203.

<https://www.hudexchange.info/programs/esg/>

The screenshot shows a web browser window with the URL <https://www.hudexchange.info/programs/esg/>. The page header includes the HUD Exchange logo and navigation menus. The main content area features a large heading for the Emergency Solutions Grants Program, followed by a detailed description of the program's history and regulations. A list of links provides access to various resources, including guides, tools, and webinars. On the right side, there are three highlighted boxes: 'Learn About Homelessness Assistance Programs', 'Planning and Reporting for ESG', and 'ESG Program Limits'. The page also includes a 'NEED HOUSING ASSISTANCE?' button and a user profile dropdown.

Resources and assistance to support HUD's community partners

HUD EXCHANGE
Secretary Ben Carson

My HUD Exchange Programs Resources Trainings Program Support Grantees News

Home Programs ESG: Emergency Solutions Grants Program

Emergency Solutions Grants Program

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The second allocation of FY 2011 ESG funding and future years are all subject to the ESG regulations. The first allocation of FY 2011 ESG funding and prior years are subject to the Emergency Shelter Grants Program regulations. [View HUD Secretary Donovan's video introducing the Emergency Solutions Grants \(ESG\) program.](#)

- [Learn about ESG Requirements](#)
- [View ESG Law, Regulations, and Notices](#)
- [View the SNAPs Weekly Focus](#)
- [View SNAPs-Shots](#)
- [View Other ESG Program Information](#)

ESG Program Guides, Tools, and Webinars

Guides, tools, webinars, and other resources are provided to assist grantees and program partners in designing and implementing their programs.

[View ESG Program Guides, Tools, and Webinars](#)

[View ESG Peer to Peer Resources](#)

ESG News & Announcements

[HUD Conducting Survey of All RRH Programs](#)
Date Posted: June 26, 2018

[Save the Date: Rapid Re-Housing Institutes - October 2-3, 2018 and October 16-17, 2018](#)
Date Posted: June 22, 2018

[Register Today: Best Practices for Setting Up and Completing the CAPER in the eCon Planning Suite - July 26, 2018 - 1:00 PM EDT](#)
Date Posted: June 22, 2018

[The FY 2018 CoC Program Competition is Now Open](#)
Date Posted: June 20, 2018

[From Our Partners: CDC Releases Official Health Advisory Related to Hepatitis A Outbreaks among Persons Experiencing Homelessness](#)
Date Posted: June 20, 2018

[2018 NHSDC Fall Conference - Portland, Oregon - October 17-18, 2018](#)
Date Posted: June 19, 2018

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Planning and Reporting for ESG

[IDIS: Integrated Disbursement and Information System](#)

[Consolidated Plan, Action Plan, and CAPER](#)

[ESG CAPER Guides, Tools, and Webinars](#)

[HMIS: Homeless Management Information System](#)

[Housing Inventory Count \(HIC\)/Point-In-Time \(PIT\) Count](#)

[Annual Homeless Assessment Report \(AHAR\)](#)

ESG Program Limits

[ESG Income Limits](#)