

## APPENDIX B

### ESG Substantial Amendment to 2011 Action Plan

**Emergency Solutions Grant Program  
Substantial Amendment to  
2011 Action Plan**

**I. Federal Application Form SF-424.**

Federal Application Form SF-424 is attached.

**II. Summary of Consultation Process with Continuum of Care**

The Snohomish County Office of Community and Homeless Services (OCHS) within the Human Services Department consulted with the local Continuum of Care regarding how to allocate ESG funds for eligible activities, developing performance standards for ESG-assisted projects, evaluating the outcomes of ESG-assisted projects, and developing funding, policies, and procedures for the administration and operation of the Homeless Management Information System (HMIS).

OCHS held an initial consultation meeting in February 2012 with members of the Continuum of Care Coordinating Committee and other key Continuum of Care stakeholders, including current ESG project sponsors. OCHS staff provided information on the new ESG regulations and the new ESG funding available and facilitated a discussion on several related items. A summary of the main items discussed is included below.

The group discussed how to allocate ESG funding for eligible activities. Items discussed included, but were not limited to, the need to continue to make funding available for emergency shelter activities from the total annual ESG allocation, the limited amount of new ESG funding available and how to strategically and efficiently target these resources, HUD regulations and guidance for use of the new funds, reasons for not funding homeless prevention assistance, a proposed budget for using the new funds for grant administration, HMIS, and rapid re-housing, the effectiveness of various models that may be utilized to provide rapid re-housing and rent assistance, and how to geographically distribute funds, to the extent feasible, given the limited resources. The group also discussed additional areas where consultation with the Continuum of Care is needed including performance standards for ESG projects and designing a collaborative process for evaluating the outcomes of ESG projects. The meeting participants decided to continue consultation regarding these items via e-mail. Additional consultation followed thereafter via e-mail regarding performance standards for ESG projects

and for input on draft written standards for provision of services by ESG subrecipients. Consultation with the CoC will continue regarding designing a collaborative process for evaluating the outcome of ESG projects.

The consultation activities discussed above are in addition to several consultation and planning activities that have occurred over the past year between the County and the Continuum of Care to set priorities for Federal, state, and local funding. Use of ESG funding was considered in the broad scope of these funding priorities.

In addition, the County regularly consults with the Continuum of Care regarding the local HMIS. The Snohomish County HMIS is a partnership between the Continuum of Care and County government. The procurement of the local HMIS system and the ongoing development of the local HMIS policies and procedures has been done in consultation with the HMIS Partners Group. The HMIS Partners Group meets quarterly and consists of an evolving group of Continuum of Care members, including some HMIS users and other program managers. Updates to HMIS policies and procedures are vetted through the HMIS Partners Group prior to implementation. The County seeks input from the HMIS Partners Group on an ongoing basis in order to improve the system and operation of HMIS. The County also provides updates and seeks input on HMIS from the larger Continuum of Care/Homeless Policy Task Force which meets every other month. The County will continue to consult with the Continuum of Care regarding HMIS through these processes.

### **III. Summary of Citizen Participation Process**

The Snohomish County Housing and Community Services Division followed its Citizen Participation Plan for this substantial amendment. The proposed substantial amendment was published as part of the Draft 2012 Action Plan, which was open for a 30-day public review and comment period. A public notice was published in the Everett Herald, the local newspaper of general circulation. The notice included a summary of the proposed amendment and information on the public review and comment period and the public hearing. The notice was e-mailed to the mailing list of interested persons and organizations maintained by the Snohomish County Human Services Department Office of Housing and Community Development(OHCD), e-mailed to the Homeless Policy Task Force distribution list maintained by the Snohomish County Human Services Department Office of Community and Homeless Services (OCHS), e-mailed to

the Housing Consortium of Everett and Snohomish County, and e-mailed to the mayors of Consortium-member cities. Information on the amendment and the opportunity to comment was posted on the County's Human Services Department and OHCD/OCHS websites. Paper copies were also available at the Snohomish County libraries of Consortium-member cities, the local city halls of Consortium member cities, and at the Snohomish County Human Services Department OHCD office. The 30-day public review and comment period was open from April 6, 2012, through May 7, 2012. A public hearing was held on May 4, 2012. The Snohomish County Council approved the amendment on May 9, 2012, as part of the 2012 Action Plan. No comments were received regarding this amendment.

#### **IV. Matching Funds**

ESG funds carry a dollar for dollar matching fund requirement.

The County will require subrecipients of ESG funds to provide dollar for dollar matching fund contributions totaling the amount of their ESG sub-award. Matching funds provided for rapid re-housing activities will be used to pay for additional rapid re-housing activity costs. Matching funds provided for HMIS activities will be used to pay for additional HMIS activity costs. Matching funds will be provided from eligible Federal, state, local or private sources.

The County will provide dollar for dollar matching fund contributions for administration costs and for any HMIS costs utilized by the County. Matching funds provided for administration costs will be used to pay for additional grant administrative costs related to the planning and execution of ESG activities. Matching funds provided for HMIS costs will be used to pay for additional County HMIS costs. Matching funds will be provided from eligible Federal or local sources.

#### **V. Proposed Activities and Overall Budget**

##### **A. Proposed Activities**

The first allocation of 2011 ESG funds totaled \$135,197. Of these funds, \$128,437.15 was allocated to emergency shelters (including transitional housing eligible under the grant) and \$6,759.85 was allocated to grant administration.

The second allocation of 2011 ESG funds consists of an additional \$76,048. Snohomish County plans to allocate these funds as follows: \$59,360 to rapid re-housing activities, \$7,604.47 to HMIS costs, and \$9,083.53 to grant administration costs.

While the emergency shelter component is slightly over 60 percent of the total 2011 ESG allocation, it is less than the 2010 obligated amount for homeless assistance activities. Therefore, the emergency shelter component is within the allowable hold harmless amount for these activities for the 2011 program year. The 2010 obligated amount for homeless assistance activities is shown in Table 1 below.

**Table 1: HUD Suggested Format for Declaration of Program Year 2010 Grant Fund Commitments**

<b>Activity Type</b>	<b>Obligated Amount</b>
Homeless Assistance	\$128,782
Homeless Prevention	\$0
Administrative Activities	\$6,778
<b>Total FY 2010 Award</b>	<b>\$135,560</b>

The following four pages provide descriptions of the activities to be funded with the second phase allocation of Program Year 2011 ESG funds.

**Table 3C**  
**Consolidated Plan Listing of Projects: 2011 Action Plan**

**Jurisdiction's Name:** Snohomish County

**Priority Need:** Planning/Administration, Strategy CD-6

**Project Title:** ESG Administration

**Description:**

Funds will be used by Snohomish County for administrative activities related to the planning and execution of ESG activities. Eligible administrative costs include: 1.) overall program management, coordination, monitoring, and evaluation, 2.) providing training on ESG requirements and attending HUD-sponsored ESG trainings, 3.) preparing and amending the ESG and homeless-related sections of the consolidated plan, and 4.) carrying out required environmental review responsibilities.

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

**Location/Target Area:**

3000 Rockefeller Avenue, M/S 305, Everett, WA 98201. County-wide.

Objective Number CD-6 PAO-1	Project ID
HUD Matrix Code	CDBG Citation
Type of Recipient	CDBG National Objective
Start Date (mm/dd/yyyy) 07/01/12	Completion Date (mm/dd/yyyy) 06/30/14
Performance Indicator N/A	Annual Units N/A
Local ID	Units Upon Completion N/A

**Funding Sources:**

CDBG	.....
ESG	9,083.53
HOME	.....
HOPWA	.....
Total Formula	9,083.53
Prior Year Funds	.....
Assisted Housing	.....
PHA	.....
Other Funding	9,083.53
Total	18,167.06

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

**Table 3C**  
**Consolidated Plan Listing of Projects: 2011 Action Plan**

**Jurisdiction's Name:** Snohomish County – Human Services Department and/or ESG Subrecipients

**Priority Need:** Affordable Housing, Strategy H-2

**Project Title:** HMIS

**Description:**

Funds will be used to pay for eligible Homeless Management Information System (HMIS) costs by the County Human Services Department and/or ESG recipients such as costs to contribute data to the local HMIS, County Human Services Department HMIS lead agency costs, and/or the costs of an ESG subrecipient which is a victim services provider or a legal services provider to establish and operate a comparable database that collects the required data.

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

**Location/Target Area:**

3000 Rockefeller Avenue, M/S 305, Everett, WA 98201. County-wide.

Objective Number	Project ID
HUD Matrix Code	CDBG Citation
Type of Recipient	CDBG National Objective
Start Date (mm/dd/yyyy) 07/01/2012	Completion Date (mm/dd/yyyy) 06/30/2014
Performance Indicator 1 % unit/bed coverage in HMIS	Accomplishments: Annual & Upon Completion 99% Households (HH) w/ children 97% HH w/o children 100% HH w/ only children
Performance Indicator 2 Data Quality	Accomplishments: Annual & Upon Completion a. 100% HMIS records w/ no missing values b. Ten data elements w/ minimum 90% completeness

**Funding Sources:**

CDBG	.....
ESG	7,604.47
HOME	.....
HOPWA	.....
Total Formula	7,604.47
Prior Year Funds	.....
Assisted Housing	.....
PHA	.....
Other Funding	7,604.47
Total	15,208.94

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





**Table 3C**  
**Consolidated Plan Listing of Projects: 2012 Action Plan**

**Jurisdiction's Name:** Snohomish County

**Priority Need:** Public Service Programs, Strategy CD-5

**Project Title:** Rapid Re-Housing – Housing Relocation & Stabilization Services

**Description:**

Funds will be used to provide rapid re-housing housing relocation and stabilization services to homeless persons and/or families. Individuals or families staying in emergency shelters or staying in places not meant for human habitation or youth existing transitional housing or facilities will be prioritized for rapid re-housing assistance. Persons assisted will include homeless families, veterans, and youth, though not exclusively. Project sponsor(s) to be selected through an RFP process.

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

**Location/Target Area:**

County-wide.

Objective Number PSO-1	Project ID
HUD Matrix Code	ESG Citation
Type of Recipient	CDBG National Objective N/A
Start Date (mm/dd/yyyy) 07/01/2012	Completion Date (mm/dd/yyyy) 06/30/2014
Performance Indicator Households Served	Annual Units 20
Local ID	Units Upon Completion 40

**Funding Sources:**

CDBG	.....
ESG	21,370.00
HOME	.....
HOPWA	.....
Total Formula	21,370.00
Prior Year Funds	.....
Assisted Housing	.....
PHA	.....
Other Funding	21,370.00
Total	42,740.00

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

**Table 3C**  
**Consolidated Plan Listing of Projects: 2012 Action Plan**

**Jurisdiction's Name:** Snohomish County

**Priority Need:** Public Service Programs, Strategy CD-5

**Project Title:** Rapid Re-Housing Tenant Based Rental Assistance

**Description:**

Funds will be used to provide rapid re-housing tenant-based rental assistance to homeless persons and/or families. Individuals or families staying in emergency shelters or staying in places not meant for human habitation or youth existing transitional housing or facilities will be prioritized for rapid re-housing assistance. Persons assisted will include homeless families, veterans, and youth, though not exclusively. Project sponsor(s) to be selected through an RFP process.

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

**Location/Target Area:**

County-wide.

Objective Number PSO-1	Project ID
HUD Matrix Code	CDBG Citation
Type of Recipient	CDBG National Objective
Start Date (mm/dd/yyyy) 07/01/2012	Completion Date (mm/dd/yyyy) 06/30/2014
Performance Indicator Households Served	Annual Units 20
Local ID	Units Upon Completion 40

**Funding Sources:**

CDBG	.....
ESG	37,990.00
HOME	.....
HOPWA	.....
Total Formula	37,990.00
Prior Year Funds	.....
Assisted Housing	.....
PHA	.....
Other Funding	37,990.00
Total	75,980.00

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

## B. Discussion of Funding Priorities

There are four eligible uses for the second phase of PY 2011 ESG funds. These eligible uses include grant administration costs, HMIS activities, homeless prevention assistance, and rapid re-housing assistance. Snohomish County has allocated these funds to three of the four eligible activities. The following is explanation of the funding priorities chosen for these funds.

1. Administration: The revised ESG regulations have increased the cap on allowable grant administration costs from 5 percent to 7.5 percent of the total grant amount. This amendment allocates the total allowable increased administration costs to the County. The previous cap on these funds has not been adequate. In addition, the new ESG regulations require increased administrative functions, including additional strategic planning and program oversight. HUD has indicated that by raising the expenditure limit on administrative activities, it is increasing communities' capacity to engage in the additional required functions.
2. HMIS Activities: The County and provider agencies have been looking at ways to meet the increased HMIS requirements from HUD. The County carries the greatest burden for HMIS administration, but our non-profit provider agencies also have needs for covering the cost of data entry into the system. The County will need to increase staff time to meet the increased requirements. This amendment allocates ten percent of the second phase of 2011 ESG funds to HMIS activities, which will allow both the County and our provider agencies to utilize ESG funds to help support HMIS at a level needed to meet the requirements.

The HMIS allocation will be offered first to the provider(s) should they need the funding to support their ESG HMIS activities. Any funds not allocated to the provider(s) will be retained by the County for County costs related to HMIS.

Providing ESG funding for HMIS activities also supports Objective 2 of the national priorities established in "Opening Doors: Federal Strategic Plan to Prevent and End Homelessness." Objective 2 is to strengthen the capacity of public and private organizations by increasing knowledge about collaborations, homelessness, and successful interventions to prevent and end homelessness. The funds will support local HMIS

activities which are consistent with federal strategies including more readily available local information and data on best practices and special populations, increased use of HMIS, inventory of emergency response programs in HMIS, and common data standards and uniform performance measures. The local HMIS is compliant and consistent with HUD data standards, and ESG funds will support increased use of HMIS to provide information and evaluation for planning and for implementation of new federal HEARTH Act measures for our local CoC.

3. Rapid Re-Housing Activities: Due to the limited funding available, HUD's preference to fund rapid re-housing over homeless prevention, and community need, the remainder of funding is allocated to rapid re-housing activities.

HUD strongly encourages jurisdictions to prioritize rapid re-housing for homeless persons living on the streets or in emergency shelters over homeless prevention assistance. This focus on rapid re-housing is intended to help decrease the number of persons who are homeless and to help ensure that existing shelter resources are used to serve people with the most urgent housing crises. HUD has also indicated that the success of homeless prevention activities is much more difficult to measure and harder to strategically target.

In the 2012 Annual Point in Time (PIT) Count of homeless persons in Snohomish County, 378 persons were in emergency shelters and 717 persons were unsheltered. Both of these numbers reflect an increase from 2011 PIT data, although the data is subject to variables that affect the count. Although not a complete count of homeless persons, the PIT data demonstrates the need for additional assistance in our community for homeless persons to obtain and maintain their housing. Rapid re-housing has been identified as a solution to help address this need. The intent is to target rapid re-housing activities to people living in places not meant for human habitation and in emergency shelters. In addition to the ESG funding that will be allocated to these activities, the County has dedicated some additional state and local funds for rapid re-housing activities.

Providing funding for rapid re-housing activities also supports Objectives 3, 6, and 10 of the national priorities established in "Opening Doors: Federal Strategic Plan to Prevent and End Homelessness."

Objective 3 is to provide affordable housing to people experiencing or at most risk of homelessness utilizing the rent assistance and improve access to assistance strategies, and consistency with the families and children signature initiative. The rapid re-housing activities will provide rental assistance and housing stability services to help homeless persons obtain and maintain permanent housing that is affordable for their income/resource level, to the extent practicable. In addition, families with children will be one of the target populations for this assistance, although not the exclusive population assisted, which is also consistent with local homeless strategies.

Objective 6 is to reduce financial vulnerability through improved access to income supports. The rapid re-housing activities will be coordinated with other mainstream systems resources to ensure that persons are accessing income supports that they are eligible to receive or employment supports to reduce their financial vulnerability to homelessness. The program will be integrated into the systems change effort begin led by the County in partnership with the Workforce Development Council of Snohomish County to improve access to income supports and economic opportunities.

Objective 10 is to transform the crisis response systems to prevent homelessness and rapidly return people who experience homelessness to stable housing. The rapid re-housing activities currently underway with other funding will be enhanced by the addition of the ESG funds for rapid re-housing as the County and the CoC re-tool our homeless assistance system. The rapid re-housing strategy is identified as a best practice to move persons from homelessness to permanent housing quickly. The model used locally was developed from local lessons learned through the Homeless Prevention and Rapid Re-Housing Program (HPRP) and is consistent with HEARTH Act strategies. In addition, mainstream services will be coordinated with and utilized in our re-tooling efforts.

4. Obstacles to Meeting Underserved Needs in the Community:

The greatest obstacle to meeting underserved needs for homeless persons and persons at risk in the community is that the need for housing and services to help them achieve stability and self-sufficiency is greater than the resources available to help meet these needs.

### **C. Detailed Budget.**

Snohomish County is not re-programming any funds from the first allocation of 2011 ESG funds. A detailed budget of the planned activities and funding levels for the second allocation of 2011 ESG funds is included on the following page using the HUD Table 3 format.

**Table 3: FY 2011 Detailed Budget Table**

First Allocation		Second Allocation		Total Fiscal Year 2011	
First Allocation	\$135,197.00	Second Allocation	\$76,048.00	Total Fiscal Year 2011	\$211,245.00
Second Allocation	\$76,048.00	Grant Amount	\$211,245.00	Total Administration	\$15,843.38
Grant Amount	\$211,245.00	<b>FY 2011</b>			
Total Administration	\$15,843.38	<b>Emergency Shelter Grants/Emergency Solutions Grants</b>			
		<b>Program Allocations</b>			
		<b>First Allocation</b>		<b>Second Allocation</b>	<b>Total Fiscal Year 2011</b>
	<b>Eligible Activities</b>	<b>Activity Amount</b>	<b>Reprogrammed Amount</b>	<b>Activity Amount</b>	<b>Activity Amount</b>
<b>Emergency Shelter Grants Program</b>	Homeless Assistance	<b>\$128,437.15</b>	<b>\$0.00</b>		<b>\$128,437.15</b>
	<i>Rehab/Conversion</i>	\$0.00	\$0.00		\$0.00
	<i>Operations</i>	\$102,359.15	\$0.00		\$102,359.15
	<i>Essential Services</i>	\$26,078.00	\$0.00		\$26,078.00
	Homelessness Prevention	<b>\$0.00</b>	<b>\$0.00</b>		<b>\$0.00</b>
	Administration	<b>\$6,759.85</b>	<b>\$0.00</b>		<b>\$6,759.85</b>
	<b>Emergency Shelter Grants Subtotal</b>	<b>\$135,197.00</b>	<b>\$0.00</b>		<b>\$135,197.00</b>
<b>Emergency Solutions Grants Program</b>	Emergency Shelter**			<b>\$0.00</b>	<b>\$0.00</b>
	<i>Renovation**</i>			\$0.00	\$0.00
	<i>Operation**</i>			\$0.00	\$0.00
	<i>Essential Service**</i>			\$0.00	\$0.00
	<i>URA Assistance**</i>			\$0.00	\$0.00
	Street Outreach - Essential Services**			<b>\$0.00</b>	<b>\$0.00</b>
	HMIS		<b>\$0.00</b>	<b>\$7,604.47</b>	<b>\$7,604.47</b>
	Rapid Re-housing		<b>\$0.00</b>	<b>\$59,360.00</b>	<b>\$59,360.00</b>
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$21,370.00	\$21,370.00
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$37,990.00	\$37,990.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Homelessness Prevention		<b>\$0.00</b>	<b>\$0.00</b>	<b>\$0.00</b>
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$0.00	\$0
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$0.00	\$0
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Administration			<b>\$9,083.53</b>	<b>\$9,083.53</b>
		<b>Emergency Solutions Grants Subtotal</b>		<b>\$0.00</b>	<b>\$76,048.00</b>
		<b>Total Grant Amount:</b>		<b>\$211,245.00</b>	

#### **D. Written Standards for Provision of ESG Assistance**

Snohomish County will require subrecipients of ESG funding to follow and consistently apply the following written standards for providing assistance with ESG funds.

1. Evaluation of individuals' and families' eligibility for assistance under ESG.
  - a. To be eligible for ESG assistance, all households must meet the homeless definitions that apply to the type of ESG activity, such as rapid re-housing (24 CFR 576.2 Definitions).
    - i. In order to be consistent with the homeless definitions used by other Continuum of Care funded projects, at this time the County will not serve individuals and families qualifying under Homeless Category 3. Should the County and the Continuum of Care move forward with completing the activities under Homeless Category 3 per HUD CPD Notice 12-01 and be approved for Continuum of Care funded projects, then ESG projects will be notified of whether they may qualify ESG participants under Homeless Category 3 for any eligible ESG activities.
    - ii. The County is not proposing the use of ESG funds for homeless prevention activities at this time. Therefore, the at risk of homelessness definitions will not apply to ESG-funded projects. Should the County choose to fund homeless prevention activities in the future, any ESG projects will qualify participants per the homeless prevention definitions.
    - iii. Emergency shelter participants qualified under Category 2 must lack other resources or social networks to obtain other appropriate shelter or housing.
    - iv. Rapid re-housing participants must be qualified under Category 1, literally homeless individuals and families currently living in an emergency shelter, in places not meant for human habitation, or youth exiting transitional housing.



b. Participant evaluation

- i. All individuals or families will be initially evaluated to determine eligibility for ESG assistance, and to determine the amount and types of assistance needed to regain stability in permanent housing.
- ii. Individuals and families receiving rapid re-housing assistance will be re-evaluated at least annually.
- iii. Annual income, if documentation is required, must be determined according to 24 CFR 5.609.
- iv. All individuals and families must be evaluated to determine that they lack the resources and social networks to obtain or sustain housing without ESG assistance.

c. Documentation

- i. Eligibility and evaluation must be documented in client files for each participant or family served with ESG assistance.
- ii. Documentation must meet the ESG requirements in 24 CFR 576.
- iii. Third party documentation is the preferred method, except for persons qualified under Category 4 to avoid placing the individual or family at risk of violence.
- iv. Other methods consistent with 24 CFR 576 may be used, though the client file should contain documentation that there was an attempt to obtain third party documentation or the justifications that third party documentation could not be obtained or obtained in a timely manner.

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

County ESG funding will not be used to provide essential services related to street outreach at this time.

3. Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG.

a. Admission

- i. Per eligibility standards.
- ii. For rapid re-housing, priority will be given to individuals or families staying on the streets, in cars, etc., or to persons residing in emergency shelters, or unaccompanied youth exiting transitional housing or youth facilities.

b. Diversion

Individuals or families seeking shelter should be referred to other prevention or rapid re-housing programs to avoid homelessness or to re-house those who are experiencing homelessness.

c. Referral

Participants and families will be assessed to make appropriate referrals to mainstream services, including public benefit programs, housing programs, and services.

d. Discharge

To the degree possible, persons discharging from emergency shelter will be assisted in accessing housing that best fits their needs, with a preference for assisting people to access permanent housing. Discharge may also include persons entering treatment facilities to address mental health, substance abuse, or medical needs. Providers will coordinate with the treatment provider to support a successful transition. When possible, housing options or other resources should be provided at discharge, so that persons have knowledge of where to go when treatment is completed.

- e. Length of stay
    - i. The overarching goal is to reduce the time spent homeless. To the extent practicable, individuals and families will be assisted in obtaining housing within 30 days of emergency shelter entry. All ESG-funded shelters will strive to reduce the average length of stay (includes transitional housing assisted with ESG funding). However, persons may stay longer to prevent them from becoming homeless on the streets or other places not meant for human habitation.
    - ii. Individuals or families provided rapid re-housing assistance will stay according to the model funded with ESG assistance, which will allow some flexibility to avoid persons becoming homeless again.
  - f. Safeguards to meet safety and shelter needs for special populations
    - i. Projects serving individuals or families qualified under Category 4 (persons fleeing or attempting to flee violent situations) must follow all related Federal and state laws, follow confidentiality policies, and provide specific services to meet the safety and special needs of this population.
    - ii. Projects serving individuals and families with very high needs must provide shelter and services that meet the special needs for these populations.
4. Policies and procedures for assessing, prioritizing, and reassessing individual's and families' needs for essential services related to emergency shelter.
- a. Each individual and family will be assessed to identify needs and barriers to obtain housing and increased self-sufficiency.
  - b. Assessments will be completed at program entry, then re-assessed at 30-days or sooner if needed to assist persons moving to housing. If person's stay in shelter is longer than 30-days, then reassessment must be done every 30-days and show that the person or household needs additional time in shelter to obtain other housing, and would be homeless unsheltered without ESG assistance.

- c. Each person or family must have a housing stability plan in place, which is updated at least every 30-days. The plan will be derived from the assessment and include the individual or family's participation in developing their own individualized service plan to obtain housing and maintain housing stability.
  - d. Essential services should be tied directly to the needs and barriers identified in the assessment, and agencies are encouraged to build on the individual or families strengths to attain increased self-sufficiency and housing stability.
  - e. Obtaining appropriate housing, especially permanent housing, and addressing the most immediate and manageable barriers will be the priority for emergency shelters. Given the expected short period of assistance, the focus will need to be on those barriers that can be addressed during the timeframe of assistance. In addition, each individual or household will have a housing stability plan that may include longer-term solutions to other barriers or risk-factors that might destabilize a household after assistance has ended.
5. Policies and procedures for coordination among emergency shelter providers, essential services providers, homeless prevention providers, rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

The County and the Continuum of Care have been engaged in planning activities to increase systems coordination among the various housing and service providers to improve access for clients and to better target funding and efforts to address the housing and service needs in our community. The County and ESG subrecipients will coordinate and integrate, to the maximum extent practicable, ESG-funded activities with mainstream housing, health, social services, employment, education, and youth programs, including those in 24 CFR 576.440(b) and (c). ESG funded projects will be expected to coordinate and integrate with County or Continuum of Care initiatives or other efforts to improve coordination with mainstream resources, which includes those noted in 24 CFR 576.440(b).

6. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homeless prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
  - a. County ESG funding will not be used to provide homeless prevention assistance at this time. The County is funding homeless prevention assistance with other financial resources.
  - b. Individuals or families staying in emergency shelters or staying in places not meant for human habitation or youth exiting transitional housing or facilities will be prioritized for rapid re-housing assistance. Persons assisted will include homeless families, veterans, and youth, though not exclusively.
  - c. Persons needing homeless prevention assistance will be referred to homeless prevention programs.
7. Standards for:
  - i.) determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homeless prevention or rapid re-housing assistance,
  - ii.) determining how long a particular program participant will be provided with rental assistance and how the amount of assistance will be adjusted over time, and
  - iii.) standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant.
  - a. County funds will not be used to provide homeless prevention assistance as this time.
  - b. Individuals and families will be assessed to determine if they fit into a 6-month maximum or 12-month maximum mode of rent assistance. Rent assistance will be graduated, so the participant's share of rent will increase until they pay full rent. Should a participant experience a situation that prevents them from achieving the graduated subsidy goal, then the subsidy may be extended or adjusted with a revised graduated subsidy established. Participants must be in compliance with the program and working on their housing stability plan to be considered for an extension or revised graduated subsidy plan.

- c. Individuals and families may receive up to 24 months of housing stability services to help them obtain and sustain housing stability. Services may be provided consecutively or intermittently, as needed to maintain housing stability.
- d. Participants may receive up to two subsequent financial assistance payments after their graduated subsidy has ended, if they were compliant with their housing stability plan and they experienced a hardship that prevented them from making their payment.
- e. Hardships may include a job loss or reduction in pay/hours, medical expenses, or other similar situation. The participant must not have exited the program to receive assistance.
- f. High needs participants may receive additional housing stability services for a period not to exceed three (3) years, as long as they have not exited the program and the services support the household in maintaining their housing.
- g. Financial assistance and housing stability services must be in compliance with 24 CFR 576.104, 24 CFR 576.105, 24 CFR 576.106 and 24 CFR 576.400.

#### **E. Process for Making Sub-Awards**

Snohomish County will use the following process for making sub-awards of these ESG funds for HMIS and rapid re-housing activities.

With regard to the ESG funds allocated to HMIS costs, these costs would first be offered to the ESG provider(s), should they need funding to support their ESG HMIS activities. Any funds not allocated to the provider(s) will be retained by the County for County costs related to HMIS. For 2011 ESG projects that were already awarded ESG funding during the first allocation phase for 2011 ESG funding, funding for HMIS costs will be made available based on a showing of need for these funds. For 2011 ESG rapid re-housing project(s), which have not yet been selected, applicants may request funding for HMIS costs through the planned RFP process for these project(s).

The County will issue an RFP for specific rapid re-housing and related HMIS activities. County staff will review the proposals and submit them to the Housing and Community Development Policy Advisory Board (PAB) for

review and funding recommendations. If required, there would be a 30-day public review and comment period. Final approval of project award(s) will be by the County Council, or through a request for delegation of approval authority, by the County Executive or his designee. Due to the limited amount of funds available, it is anticipated that only one or two projects will be funded.

#### **F. Homeless Participation Requirement**

The County currently has a process for obtaining input from homeless and formerly homeless persons and is in the process of developing an enhanced plan for outreach to, and consultation with, homeless or formerly homeless individuals. The additional consultation will focus on considering and making policies and decisions regarding any facilities or services that receive funding under ESG.

The County and the Continuum of Care work in partnership to conduct the annual Point in Time (PIT) Count of homeless persons, which includes a survey that provides input for planning. In addition, the County and the Continuum of Care partner to conduct an annual Project Homeless Connect (PHC) event. At this event, homeless and formerly homeless persons complete a survey which provides input that can be used for planning. The County and the Continuum of Care will explore how to obtain additional input at the PIT Count and PHC event that will provide more specific input on ESG activities. This might, for example, include a few survey or interview questions about rapid re-housing and/or emergency shelter activities and how these programs are meeting or not meeting the needs of persons assisted. The County will continue to explore other options that may include focus groups consisting of persons who are currently or were previously assisted with ESG funds. In addition, the County anticipates that other opportunities to enhance outreach and input will be provided as the County and the Continuum of Care work to implement the upcoming Continuum of Care regulations.

#### **G. Performance Standards**

The following performance standards will apply to ESG-funded projects and will be incorporated into ESG contracts. Standards include HEARTH Act requirements and individual project requirements. Benchmarks, outputs, and outcomes will be set as initial standards. Standards will be revised and aligned with the upcoming HUD Continuum of Care regulations when they are

published.

1. General Continuum of Care system performance measures will include:

- a. Reduce the time spent in shelters and residing in public or private places not ordinarily used as regular sleeping accommodations for human beings, including a car, park, abandoned building, bus or train station, or camping ground.
- b. Reduce recidivism by homeless persons who were housed in permanent housing but became homeless again. This will be measured by a benchmark percentage.
- c. System occupancy/utilization is at or above a specified percentage.

2. ESG performance measures will include:

- a. Emergency shelter output and outcome measures.

Numbers served, reduce average length of stay, percentage of unit or bed utilization, percentage exiting to permanent housing, and access to mainstream resources.

- b. Rapid re-housing performance measures will include:

Numbers served, benchmark to re-house persons in permanent housing within 30 days, housing stability benchmarks (6 months, 12 months, etc.), access to mainstream resources, recidivism per benchmark, and cost per households/person served.

- c. HMIS performance measures will include:

Unit and bed coverage in HMIS, successful AHAR data submission (includes data quality), quality ESG reporting data, and training and technical assistance for agencies and users.

## **H. Certifications**

The required certifications will be attached to the approve amendment with its submission to HUD.



**I. Written standards required for recipients who are eligible and decide to use part of the second allocation of 2011 ESG funds for emergency shelter and street outreach activities.**

Not applicable. Snohomish County will not be using any part of the second allocation of 2011 ESG funds for emergency shelter or street outreach activities.

**J. Requirements for recipients who plan to use the risk factor under paragraph (1)(iii)(G) of the “at risk of homelessness” definition.**

Not applicable. Snohomish County will not be using any part of the second allocation of 2011 ESG funds for homeless prevention activities and does not intend to use this risk factor.