

APPROVED  
BY ORANGE COUNTY BOARD  
OF COUNTY COMMISSIONERS  
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Substantial Amendment  
2011-2012 Annual Action Plan  
to include

# EMERGENCY SOLUTIONS GRANT

Housing and Community Development Division

**SUBSTANTIAL AMENDMENT**

**2011-2012 ANNUAL ACTION PLAN**  
**TO INCLUDE**

**EMERGENCY SOLUTIONS GRANT**

Orange County Housing and Community Development Division  
525 E. South Street, Orlando, Florida 32801

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# **SUBSTANTIAL AMENDMENT**

## **2011-2012 ANNUAL ACTION PLAN TO INCLUDE EMERGENCY SOLUTIONS GRANT**

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### **Introduction**

In 2009, programs under the Mc Kinney-Vento Homeless Assistance Act were consolidated into a single program. The Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act formally codified the Continuum of Care planning process within federal regulations. As a result, the Emergency Shelter Grants Program became the Emergency Solutions Grant. The interim rule establishing regulations for the Emergency Solutions Grant took effect on January 4, 2012.

On November 15, 2011, the Department of Housing and Urban Development (HUD) posted the interim rule for the Emergency Solutions Grants program and Consolidated Plan conforming amendments on HUD's Homelessness Resource Exchange Web site at [www.hudhre.info/esg](http://www.hudhre.info/esg). On that date, HUD also announced the amounts of a second allocation under the Fiscal Year 2011 Emergency Shelter Grants program/Emergency Solutions Grants (ESG) program. Orange County was awarded an additional \$151,745 in ESG funds.

To receive funds from the second allocation, Orange County must prepare and obtain HUD approval of a substantial amendment to its 2011 Annual Action Plan. The HUD announcement provided guidance on critical decisions to be made in the planning process.

The funds provided to recipients in the second allocation are subject to all ESG requirements under the interim rule. The interim rule shifts the main focus from emergency shelter to assisting people to quickly regain stability in permanent housing. HUD is encouraging communities to focus on rapidly re-housing persons who experience a housing crisis and/or become literally homeless, with a view to reducing the number of households falling into homelessness.

## **A. Requirements for Preparation of Substantial Amendment**

### **1. Consultation**

The Emergency Solutions Grants (ESG) interim rule includes a new requirement, consistent with the McKinney-Vento Act, for jurisdictions that are ESG recipients to consult with the Continuum of Care within their geographic area. This requirement for consultation is intended to increase and facilitate discussions and coordination in regard to:

- Determining how to allocate ESG funds for eligible activities
- Developing the performance standards for activities funded under ESG; and
- Developing funding, policies, and procedures for the operation and administration of the Homeless Management Information System (HMIS)

Orange County has noted and complied with this requirement for consultation, which is designed to foster closer coordination between the Emergency Solutions Grant and Continuum of Care programs, and also other mainstream programs involving housing and services. The intent is to provide increased resources for homeless persons and persons at imminent risk of homelessness. A summary of Orange County's consultation process undertaken as required for this Substantial Amendment is provided below at item B 2.

### **2. Citizen Participation**

In keeping with HUD regulatory requirements for grant recipients, Orange County established a Citizen Participation Plan to encourage and facilitate input by community residents and establish standards for its public participation process. Orange County's Citizen Participation Plan is committed to citizen participation in all stages of its consolidated planning process, including proposed substantial amendments. Accordingly, the County complied with the requirement for citizens to participate in this Substantial Amendment pertaining to the Emergency Solutions Grant. A summary of Orange County's citizen participation process for this Substantial Amendment is provided below at item B 3.

## **B. Required Contents - Substantial Amendment**

### **1. Standard Form 424 (SF-424)**

The Department of Housing and Urban Development (HUD) Form SF-424 Application for Federal Assistance is a requirement for this Substantial Amendment.

### **2. Summary of Consultation Process**

#### **Consultation with Continuum of Care**

In compliance with the requirement for ESG recipients to consult with their local Continuum of Care (CoC), Orange County Housing and Community Development Division initiated a meeting with the Continuum of Care serving Orange County and surrounding jurisdictions. In addition, there were consultations with another local jurisdiction and with a service provider with homeless prevention and rapid re-housing expertise.

On February 1, 2012, Orange County Housing and Community Development Division staff met with the Executive Director of the Homeless Services Network, who administers the local Continuum of Care. The Manager of the County's Division of Mental Health and

Homeless Issues, who also serves on the Board of the Continuum of Care, was also in attendance. The meeting was held at the office of the Homeless Services Network.

**Allocation of ESG funds for Eligible Activities and Priority Need** – Attendees discussed the requirements of the Emergency Solutions Grant (ESG) Program, including use of HUD’s expanded definition of the homeless, the additional activities carried over from the Homeless Prevention and Rapid Re-housing Program (HPRP) to the new ESG program, and the requirement for increased collaboration and consultation with the Continuum of Care. Attendees then discussed how to allocate ESG funds for eligible activities, determining that priorities would be based on need. The priority need was determined to be homeless and at risk families with children. This determination was based on counts and data that indicated there were insufficient emergency beds for families with children in the area served by the Continuum of Care. The problem had been made worse in recent years due to the economy, job losses and the high foreclosure rate in the state.

**Performance Standards for Activities funded under ESG** – The development of suitable performance standards to ensure desired outcomes was discussed. Written standards would be prepared as required for provision of ESG funding for homelessness prevention and rapid re-housing. These standards would include:

- Standardized policies and procedures for evaluating eligibility for ESG assistance
- Policies and procedures for coordination among service providers
- Policies and procedures for determining and prioritizing eligibility for homelessness prevention and rapid re-housing
- Standards for determining participant’s share of rent and utilities (if any) under prevention and re-housing assistance
- Standards for determining the length of time and adjustment of rental assistance
- Standards for determining type, amount, duration, and limits for homelessness prevention and rapid re-housing

In evaluating eligibility for ESG assistance, there was consensus that priority would be given to homeless families with children. CoC and local jurisdictions would continue to work together to increase coordination among service providers, through referrals and other means. In terms of workload, Rapid Re-housing case managers could generally handle about thirty (30) clients each, of which, around fifteen (15) clients may be moving into housing at any given time. Clients could include difficult to place clients, with poor credit and/or criminal records.

Attendees discussed evaluation of outcomes and related matters. The CoC agreed to share information on appropriate performance standards to evaluate outcomes, and other outcome-related details for ESG funded activities. In providing guidelines, HUD had given some flexibility to local jurisdictions to determine the type, amount, and duration of rental assistance they could provide to program participants seeking homelessness prevention and rapid re-housing. Local conditions and needs would be among the factors considered in determining the scope of assistance. It was agreed that local assistance would likely be narrower in scope in most cases. Written policies and procedures now required in relation to administration of the ESG program would be prepared as part of the Substantial Amendment to the ESG program within the context of the County’s 2011-2012 Action Plan.

**Operation of the Homeless Management Information System (HMIS)** – Orange County planned to allocate some funding [\$5,000 each year in FY 2011-2012 and FY 2012-2013] from the ESG to assist with administering the HMIS. This system was already an important mechanism for ESG reporting, access by grantees and service providers to HMIS records; and provision of numbers for various federal and other reports. HMIS staff would continue to assist with obtaining licenses for use by service providers that needed to access the system. ESG funding would help support HMIS efforts to assist with/manage reporting relating to provision of homeless prevention, housing stabilization and rapid re-housing clients. For HMIS to access the funding allocated by Orange County, it was anticipated that a contract and monthly billing would be necessary. The HMIS office would provide a contract.

In addition to the required consultation, County staff and the CoC administrator discussed other related topics as follows:

**County and CoC joint coordination efforts** - Attendees agreed that ongoing efforts to enhance coordination of homeless assistance, through meetings, information and data sharing, and other consultation would be documented and reported in Annual Action Plan.

**Coordination of Homeless Assistance with Mainstream Resources** – The need to connect homeless and at risk persons with mainstream resources and advantages of doing so were discussed. This requirement would be emphasized and communicated to service providers. Such resources could include, but are not limited to, housing programs, health services, social services, employment programs, education and youth services. The need to establish and place another case management position to speed rapid re-housing, and possibly conduct housing inspections, was discussed.

**CoC Centralized coordinated assessment system** - Attendees discussed the upcoming requirement to use the CoC Centralized coordinated assessment system to evaluate eligibility. Some access points, such as the 211 program administered by United Way and the 311 County operated system are already in place. However, there was insufficient information available at the time concerning requirements and guidelines.

**Area Wide System Coordination** - There was not sufficient information available at the time to determine specific requirements and guidelines.

**Involvement of a current or formerly homeless person** - A formerly homeless person, now a business person, currently sits on the CoC Board and is assisting with preparation of discharge policy. Additional homeless or formerly homeless persons may be added.

**Conflict of interest** – The need to ensure compliance with HUD conflict of interest requirements that were developed specifically for the ESG program was emphasized. These requirements were relevant to all program participants, including agencies, case managers, landlords, and tenants. The County and CoC would provide details to service providers.

**Fair Housing and Section 3 regulations/guidelines** – These would be discussed in briefings with service providers.

## **Meeting with the City of Orlando**

Orange County and the City of Orlando are both local jurisdictions engaged in administering homeless assistance within their boundaries. Both are within the area served by the local Continuum of Care, and share similar concerns about the local homeless population and those at risk of homelessness. Though HUD's requirement for consultation on the Substantial Amendment referred to the Continuum of Care, HUD continues to encourage collaboration among jurisdictions, agencies, organizations and individuals interested in homelessness and community development. For this reason, Orange County staff met with City of Orlando staff, as on past occasions, to discuss topics of mutual interest, and more specifically, the development of the Substantial Amendment. County and City staff met at the Orange County Housing and Community Development Division office on February 6, 2012. The following is a report of the meeting.

Staff discussed details of the requirements of the proposed Substantial Amendment to the ESG program under the FY 2011-2012 Action Plan. The Substantial Amendment was required prior to HUD's provision of a second ESG allocation for the current year. Following HUD's initial announcement of ESG funding for the current grant year, the allocation had been changed to a first and possible second allocation.

**Consultation with the local Continuum of Care regarding homeless assistance** - This is a requirement for both jurisdictions, since both are recipients of ESG funding. County staff had met with the Continuum of Care on February 1. County and City staff discussed the expanded homeless definition, and the additional and enhanced ESG components and requirements.

**Allocation of ESG funds for eligible activities** - This was discussed and the consensus concerning priorities for funding was that eligible families with children are the highest priority at this time. The population of newly homeless or at-risk families had grown in the local community due to the economic climate, the job market and the ongoing high foreclosure rate, and had attracted attention in the national media.

**Performance standards for activities under ESG** - This topic was expected to be an important aspect of the Substantial Amendment. Staff discussed the written standards, policies and procedures that were required, but were confident these could be readily developed based on past HPRP experience and HUD's guidelines and interim regulations. The Continuum of Care could assist with policies and procedures for evaluating eligibility for ESG. Both jurisdictions expected that there would likely be some limitations on the type, extent and duration of assistance allowed by HUD guidelines.

**Operation of the Homeless Management Information System (HMIS)** - On the subject of HMIS funding, both jurisdictions would contribute funds to assist with the operation and administration of the system. Both benefit from the reporting, data and other assistance the system provides. The City planned to allocate most of its second ESG allocation to conduct Rapid Re-housing activities for eligible homeless families. Service providers of rapid re-housing under the Homelessness Prevention and Rapid Re-housing Program (HPRP) would have the necessary experience to comply with HUD's objective of addressing the urgent need for this service. Staff also discussed the requirement for matching funds.



## **Meeting with Heart of Florida United Way**

A meeting was held with the Heart of Florida United Way at that agency's office on February 21, 2012 at 2:00 p.m. Heart of Florida United Way has provided services under Orange County's recent Homeless Prevention and Rapid Re-housing Program (HPRP) and is a service provider for re-housing families under the current Emergency Shelter/Solutions Grant Program. Based on its experience with HPRP and more recent re-housing efforts, the agency was interested in discussing the expanded ESG Program, HUD's requirements and expectations, and the Substantial Amendment required by HUD prior to releasing the second allocation of 2011-2012 ESG funds. The County had begun preparing the Substantial Amendment for submittal to HUD by May 15. A Notice of the Public Hearing for the Substantial Amendment would be published March 18. The following is a report of the meeting.

**Consultation** – Attendees discussed the benefits of increased consultation among all parties interested in homelessness assistance, and in particular, consultation between the County and the Continuum of Care, now a mandatory ESG requirement. County staff had recently met with the Continuum of Care and planned to do so from time to time. United Way planned to meet later that week with the Continuum of Care and would discuss outcomes, among other matters.

**Allocation of ESG funds for eligible activities and Priority Need** - Attendees took note of the additional components and activities now carried over from HPRP to the new ESG program, and the added emphasis on some components and activities. Since the County had previously partnered with United Way to conduct HPRP, UW could adapt various forms to meet the new ESG requirements and guidelines. The County's consultation efforts to date had resulted in the shared conclusion that the current ESG Priority Need for the area is eligible families with children. This was based on counts and information that indicated there are not enough emergency beds for families with children in the area served by the local Continuum of Care. Attendees acknowledged that homeless families with children were living in cars, motels and other places. United Way already has "a natural tie-in" to reach these families (through school system liaisons and other means). Attendees discussed HUD's expanded homeless definition.

**Performance Standards for Activities funded under ESG** – There was a lengthy discussion pertaining to the various written standards to be established by grantees and implemented by sub recipients administering ESG assistance. HUD provided guidelines, but had allowed some discretion to grantees developing these written standards, policies and procedures to enable them to adapt them based on local needs and community characteristics.

**Operation of the Homeless Management Information System (HMIS)** – United Way was already a participant utilizing HMIS in keeping with the requirement for funded agencies

**Centralized or coordinated assessment system to evaluate eligibility** - This is included in HUD's plans for the new ESG, to ensure the initial assessment of eligibility and the needs of each individual or family seeking homeless assistance or homelessness prevention. This will be developed by the CoC in line with minimum requirements from HUD.

**Required conflict of interest statement from agencies** – Need for an expanded statement along specified ESG guidelines, to avoid conflict or fraud, was discussed. This should consider both the agency and staff, such as case managers working with ESG.

**Fair Housing and Anti-Discrimination** – HUD expected full compliance with these regulations and guidelines by service providers, landlords, property managers and others, engaged in administering or dealing with housing clients utilizing or benefitting from funding.

**Requirements for Re-Housing Activities** – Habitability standards and rent reasonableness were requirements for funding.

**Conclusion** - The consensus from this and earlier meetings was that families with children recently made homeless or facing homelessness would be the priority target population for assistance. This population includes homeless students in the Orange County Public School system. All parties would work to move this population towards permanent housing and self sufficiency. United Way was scheduled to meet later that week with the CoC and would include a discussion of “outcomes.” Coordinated assessment details would be developed by CoC and would come later. The Substantial Amendment would be prepared by County staff.

### **3. Summary of the Citizen Participation Process**

In keeping with Orange County’s Citizen Participation Plan to encourage and facilitate citizen input on the Consolidated Plan and related Substantial Amendments, the following outreach actions were taken to provide notice of the upcoming public hearing, and to seek public comment. Any Comments and responses are included in the Substantial Amendment.

- A Public Notice announcing the Public Hearing for the Substantial Amendment was published in the Orlando Sentinel on March 18, 2012 and also published in El Sentinel (a Spanish language newspaper)
- A Draft of the Substantial Amendment was posted on the Orange County website: [www.ocfl.net/neighborhousing.aspx](http://www.ocfl.net/neighborhousing.aspx)
- The Substantial Amendment was made available at the Housing and Community Development Division at 525 E. South St., Orlando, and at the Orange County Public Library (Main Library) at 101 E. Central Blvd., Orlando
- The Public Notice was sent to the Homeless Services Network for announcement to its membership, and e-mailed to Housing and Community Development Division funded public service providers (including those assisting disabled persons, minorities, Non-English language speakers, and homeless and at risk persons)
- The Public Notice was e-mailed for posting at County Community Centers and Neighborhood Centers for Families

In addition to the information provided above, a copy of the Public Notice and related attachments are included as Attachment 1 in the List of Attachments to this document.

#### **4. Match**

Orange County anticipates receiving a second ESG Allocation in the amount of \$151,745 for the current year, FY 2011-2012. In keeping with match requirements stated in the Emergency Solutions Grants Program regulations (24 CFR Part 576), all recipient jurisdictions must provide an eligible match for the second ESG allocation; however, a recipient may require its subrecipients to provide a match equal to 100% of the value of their individual allocation. Accordingly, Orange County will request a match of equal value from agencies that are subrecipients anticipating funding under the second allocation. A match may be from a single source or may include a combination of funds from various resources, equal in value to 100% of the allocation. Acceptable sources of matching funds are federal resources (other than the ESG and CDBG programs) consistent with any exceptions or limitations, and provided the laws/regulations governing those funds permit their use as a match. Other acceptable sources are state, local and private resources. ESG subrecipients must describe their match in terms of:

- Types of cash and/or non-cash resources used as match
- Specific amounts of resources used as the match
- The proposed uses of match resources

Any Orange County subrecipient providing a match that includes cash contributions must utilize the cash contributions for allowable costs, as defined by OMB Circulars A-87 (2 CFR part 225) and A-122 (2 CFR 230). Noncash contributions may include the value of any real property, equipment, goods, or services contributed to the subrecipient's ESG program, provided that if the subrecipient had been required to pay for them with grant funds, the costs would have been allowable, and based on a method that considers fair market value.

A match may also involve salary paid to staff carrying out the ESG Program; and/or time and services contributed by volunteers to carry out the ESG Program. Services provided by individual volunteers must be valued at rates consistent with those ordinarily paid for similar work in the 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.

Some noncash contributions are real property, equipment, goods, or services that, if the subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions may only be given if the subrecipient has established, along with its regular indirect cost rate, a special rate for allocating the value of the matching contributions to individual projects and programs. For the current year, Orange County ESG subrecipients are contributing matches equal to the first ESG allocation. The County anticipates agencies will continue these matches, increasing these as necessary, to comply with requirements of the second allocation. The County will review each match.

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

##### **a. Proposed Activities**

Orange County Housing and Community Development Division will allocate the second allocation of the Emergency Solutions Grant to fund the following activities:

- Emergency Shelter - Operations and Essential Services
- Rapid Re-housing - Homeless Relocation and Stabilization Services Rent Assistance
- Homeless Prevention - Rental Assistance
- HMIS
- Administration

Orange County's second allocation will be awarded to homeless service providers initially funded under the first ESG program allocation. The County does not anticipate re-allocating ESG funds awarded in the 2011 Annual Action Plan.

#### **b. Discussion of Funding Priorities**

In accordance with the requirements, Orange County will focus its second allocation of the Emergency Solutions Grant award of \$151,745 on the following priorities:

- Emergency Shelter Activities Priority Need (serving the homeless)
- Rapid Re-Housing (serving the homeless)
- Homelessness Prevention (serving those at risk of homelessness)
- HMIS and Administration

#### **c. Detailed Budget**

A copy of the Fiscal Year 2011-2012 Detailed Budget Table is included as Attachment 3 in the List of Attachments to this document.

### **6. Written Standards for Provision of ESG for Homeless Prevention and Rapid Re-Housing**

#### **a. Standard Policies and Procedures for ESG Eligibility Assistance**

The ESG program requires Orange County to establish a series of written standards (policies and procedures) to be used in administering ESG activities. These standards will be specified, enforced, and monitored through a project administration agreement between the County and each of the agencies (subrecipients) awarded ESG funding. To effectively comply with written standards, policies and procedures, subrecipients must first become fully aware of HUD's expanded homeless definition to be used in administering the ESG program. This definition is as follows:

**Homeless Definition** - This is stated in Section 103 of the McKinney Act (42 U.S.C. 11302).  
 (a) IN GENERAL — for purposes of this Act, the term “homeless,” “homeless individual,” and “homeless person” means:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence;
- (2) 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;

(3) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including hotels and motels paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, congregate shelters, and transitional housing);

(4) An individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided;

(5) An individual or family who:

(A) Will imminently lose their housing, including housing they own, rent, or live in without paying rent, are sharing with others, and rooms in hotels or motels not paid for by Federal, State, or local government programs for low-income individuals or by charitable organizations, as evidenced by:

(i) A court order resulting from an eviction action that notifies the individual or family that they must leave within 14 days;

(ii) The individual or family having a primary nighttime residence that is a room in a hotel or motel and where they lack the resources necessary to reside there for more than 14 days; or

(iii) Credible evidence indicating that the owner or renter of the housing will not allow the individual or family to stay for more than 14 days, and any oral statement from an individual or family seeking homeless assistance that is found to be credible shall be considered credible evidence for purposes of this clause;

(B) Has no subsequent residence identified; and

(C) Lacks the resources or support networks needed to obtain other permanent housing; and

(6) Unaccompanied youth and homeless families with children and youth defined as homeless under other Federal statutes who:

(A) Have experienced a long term period without living independently in permanent housing,

(B) Have experienced persistent instability as measured by frequent moves over such period, and

(C) 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, the presence of a child or youth with a disability, or multiple barriers to employment

(7) DOMESTIC VIOLENCE AND OTHER DANGEROUS OR LIFE-THREATENING CONDITIONS - Notwithstanding any other provision of this section, HUD shall consider to be homeless any individual or family who is fleeing, or is attempting to flee,

domestic violence, dating violence, sexual assault, stalking, or other dangerous or life threatening conditions in the individual's or family's current housing situation, including where the health and safety of children are jeopardized, and who have no other residence and lack the resources or support networks to obtain other permanent housing.

The **First Step** in the process of administering any Orange County ESG program activity is to determine client eligibility. Orange County requests third party documentation as the preferred documentation of homeless status. Whenever possible, agencies should obtain third-party documentation of the criteria used to establish client eligibility. An exception for third party documentation can be made for subrecipients that provide emergency shelter assistance (i.e. a bed for one night for homeless individuals and families or victims of domestic violence).

- **Initial Consultation & Eligibility Determination:** The household must receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed. ESG clients must meet one of the following definitions of homelessness (see Homeless Definition above):
  1. Literally homeless
  2. At imminent risk of homelessness
  3. Homeless under federal status
  4. Fleeing/attempting to flee domestic violence
- **Income:** The household's total income must be below 30 percent of Area Median Income (AMI)
- **Housing Status:** Case files must document the current housing status of the client. To receive rental financial assistance, a client must have recently become homeless (to receive rapid re-housing assistance), or is imminently at risk of losing housing (to receive homelessness prevention assistance)

The criteria listed above are the minimum criteria established by HUD to determine eligibility for ESG (See Attachment 4 – Documentation Checklist for Participant's Income Eligibility). HUD allows jurisdictions such as Orange County to consider other local needs and additional risk factors to help determine if these should apply in establishing eligibility requirements. Accordingly, the following will also apply in establishing eligibility:

- **Residency:** All households receiving prevention or rapid re-housing assistance under ESG must be residents of unincorporated Orange County or residing within eligible municipalities specified in the agency's project administration agreement with Orange County.

In order to receive ESG rental financial assistance, the client must also demonstrate the following circumstances:

1. No appropriate subsequent housing options have been identified;

2. The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
3. The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

When it has been determined that the client meets the homeless definition, income, and housing status criteria based on the regulations, it is important to then assess whether the ESG program is the most appropriate program for that individual or household.

The **Second Step** is to determine the type of service(s) that the client will be receiving. ESG clients receiving services must have had an initial evaluation, including verification of eligibility (first step).

- **Street Outreach Essential Services** - Services for unsheltered clients may include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services and transportation. (Orange County is did not receive any proposals and is not funding Street Outreach in the current year)
- **Emergency Shelter Essential Services:** Services for sheltered clients may include all of the services mentioned under street outreach. Case management offered at the emergency shelter may include, but is not limited to a centralized, coordinated system, counseling, mentoring, securing other services, providing ongoing risk assessment and safety planning for victims of domestic violence, and developing an individualized housing and service plan.
- **Rapid Re-housing Services:** Services consisting of short term and medium term rental assistance, and housing relocation and stabilization services (moving costs, rent application fees, security deposits or first month's rent, last month's rent, utility payments, housing search and placement, case management, mediation, legal services, and similar assistance). The service is targeted for individuals who are literally homeless; however, in Orange County, priority will be given to families with children in Orange County public schools who have recently become homeless.
- **Homeless Prevention Services:** Services consist of short term and medium term rental assistance, and housing relocation and stabilization services (moving costs, rent application fees, security deposits, last month's rent, utility payments, housing search and placement, case management, mediation, legal services, etc). These services are targeted for individuals and families who are at imminent risk of homelessness. Documentation of imminent loss of housing includes not only a court order resulting from an eviction action or the equivalent notice under Florida law, but also a formal eviction notice, a Notice to Quit, or a Notice to Terminate, that require the individual or family to leave their residence within 14 days after the date of their application for homeless prevention assistance.

Both homelessness prevention and relocation services require inclusion of the following in the client's file:

- Documentation showing eligible use of ESG Financial Assistance and Housing Unit (Refer to Attachment 5 Documentation Checklist for Housing Unit Assistance)

- Assessment of clients, coordination of services and monitoring of progress to facilitate housing stability (Refer to Attachment 7 – Matrix to Assess Risk of Homelessness and Self-Sufficiency).

ESG financial assistance cannot be provided to eligible individuals or families for the same period of time and for the same cost types, for which they are being provided assistance through another federal, state, or local housing subsidy program. These costs include, but are not limited to: rent payments, security deposits, utility deposits, utility payments, and moving cost assistance. For example, if a client is receiving rental assistance from another source, (either a full or partial subsidy) ESG funds may not be provided to that client for rental assistance during that same time period.

#### **b. Policies and Procedures for Service Providers Coordination**

The ESG program requires, and is more effective when there is coordination among participating agencies. All ESG subrecipients in Orange County are experienced homeless providers with a minimum of two years experience, demonstrated fiscal accountability, and a good track record in the provision of homeless services. Additionally, the County's project administration agreement with ESG subrecipients will require coordination among agencies receiving ESG funds to administer emergency shelter, essential services, homelessness prevention, re-housing services and related assistance. All must be capable and willing to facilitate access to mainstream services and housing providers for clients. ESG funded agencies have access to membership in the Continuum of Care, which has over 100 member organizations, including homeless service providers, veteran service representatives, churches, and government organizations. The Continuum of Care meets on a monthly basis and shares information about services among participating agencies.

At a minimum, clients should be provided with information about the following programs and given assistance accessing those programs that would meet their needs:

- 211 Information hotline for social services
- Social security benefits
- Food stamp assistance
- Low Income Energy Assistance Programs
- Affordable housing database
- Job training programs
- Health services such as those provided by PCAN clinics, Health Care Center for the Homeless, Mental Health Services, and similar services
- Education programs
- Specialized services such as legal services, credit counseling
- Services for victims of domestic violence
- Veteran services

#### **c. Policies and Procedures to Determine and Prioritize Assistance**

As explained in Section 6.a, *Standard Policies and Procedures for evaluating individual's and families' eligibility for assistance under ESG*, to be eligible for ESG assistance, grantees and subrecipients must establish policies to assess and document that the individual or family is eligible to receive ESG assistance. While meeting one of the HUD's definitions for



homelessness is essential, it is more challenging to identify which families and individuals will receive homeless prevention assistance or re-housing assistance.

Service providers must first consider that homeless prevention assistance is aimed at households who are at risk of losing their present housing and becoming homeless. While there are many people who are housed and have a great need for rental assistance, not everyone will become homeless without assistance. HUD requires ESG grantees and subrecipients to target prevention assistance to those households that are at the greatest risk of homelessness. Subrecipients will utilize the Matrix to Assess Risk of Homelessness and Self-Sufficiency (included in Attachment 5) to assess the level of crisis of a client and prioritize those who are at greatest risk of becoming homeless. The matrix ranks several areas of a client's need (income, housing, food, childcare, health care, life skills, and other needs) and measures the level of need to provide a risk assessment that is fair and objective. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the client meets the eligibility and priority criteria. Additionally, these households must demonstrate that they will imminently lose their housing, if they do not receive the ESG assistance.

It should be noted that homeless re-housing assistance is intended for individuals or families who meet the homeless definition described in Section 103, 42 USC 11302 of the McKinney Vento Act, as amended by the HEARTH Act (see above). While there are many homeless individuals and families in Orange County on any given night, the re-housing assistance is intended for households who are actually homeless, but have recently become homeless and lack the resources to stabilize their housing needs. In particular, these families would include families that have become homeless and have children in Orange County schools. This priority was established after consultation with the Continuum of Care and the Heart of Florida United Way. The assistance will be provided on a first come, first served basis for households who meet all the required eligibility criteria.

#### **d. Standards for Determining Participant's Share of Rent and Utilities**

Orange County's ESG rental assistance is intended to stabilize individuals and families who have recently endured difficult financial circumstances that have led them into homelessness, or who are at imminent risk of becoming homeless. For homeless prevention assistance, the rental assistance consists of short term rental assistance (3 months); extended under certain circumstances to medium term rental assistance (for an additional 3 months). The total maximum length of assistance is 6 months. Not every individual or family in need of rental assistance is a candidate for ESG homelessness prevention or rapid re-housing assistance. ESG rental assistance is not a substitute for Section 8 rental assistance or a permanent rental subsidy, but a tool to help stabilize families or individuals who are at imminent risk of becoming homeless and lack any other resources to help them stabilize their housing situation.

As a general rule, individuals or households may pay up to approximately 30% of their income towards rent. However, ESG clients are experiencing an acute financial hardship, and are literally homeless, or at imminent risk of homelessness, with no other resources. Orange County will require a minimum client/participant payment of \$25 towards rent in order to receive ESG rent assistance. ESG assistance will consist of the remaining portion of the rent, up to \$800 (excluding the clients' contribution towards the rent). Clients are re-assessed 3 months after initial intake. If a client is still experiencing extreme financial hardship, after consideration of specific circumstances, the ESG assistance may be

extended over a period of 3 additional months, but the ESG portion of the rent will be reduced and the client will be required to pay 30% of their adjusted income towards rent. There is a maximum cap on prevention assistance per client, per fiscal year of \$4,000.

Due to the limited amount of funds available, ESG assistance will not exceed \$1,000 per client, per month in combined ESG assistance, including rent and utility payments. Generally, clients should be responsible for paying for their own utility costs while provided with ESG for rental assistance, unless they are experiencing acute financial hardship, or are at risk of losing their housing due to utility shut off. Clients seeking utility assistance may be eligible for ESG assistance if it can be documented that they will lose their housing and become literally homeless if utility assistance is not provided; however, the household must meet other ESG eligibility requirements. In such cases, the subrecipient must show documentation in the case file that the utility company will in fact disconnect the utility service if the full amount or a partial payment is not paid, and that if there is disconnection of utility service it will cause housing to be unsafe, or otherwise cause eviction (i.e. applicant is required to have utility service per their lease). Subrecipients must document that the client has not received other utility assistance such as the local Low Income Housing Energy Assistance Program (LIHEAP) in the past six months. Whenever possible, clients will be referred to or will be assisted by other local funds. Assistance for utility arrears should not be greater than 2 months total.

A utility shut-off notice or arrears statement is not sufficient in itself to document program eligibility. Subrecipients are responsible for verifying and documenting eligibility for all ESG clients prior to providing ESG rental assistance. Subrecipients with insufficient case file documentation may be found out of compliance with ESG program regulations during a monitoring visit.

Under re-housing assistance, a client's share of rent should be based on a client's ability to pay during their path to housing stabilization, with a minimum \$25 client contribution. Clients receiving re-housing assistance must be re-assessed at least once during a 6 month period. The maximum length of re-housing assistance will be 6 months and the total maximum ESG assistance per client in the 2011-2012 fiscal year is \$5,000. The assistance should not exceed \$1,000 per month per client, except for the first month of assistance if client requires assistance with other re-housing expenses such as rent deposits or utility deposits.

#### **e. Standards to Determine Rental Assistance's Length of Time**

ESG assistance consists of short term (up to 3 months) to medium term (up to 6 months) rental assistance, to allow individuals or families who have recently encountered a financial crisis that has led them into homelessness or at imminent risk of homelessness, to gain housing stabilization. Since the program consists of temporary assistance aimed at rapid stabilization of households, clients are required to contribute a portion of their income towards rent. Clients with no potential to earn income may not be suitable candidates for this type of assistance, unless other subsidies can be accessed after the ESG assistance expires.

Clients assisted under ESG Prevention Assistance are eligible to receive the rental assistance for up to 3 months, if they meet income eligibility during the 3 month period and comply with the case management requirements of the program. At the end of the third month, clients must be re-assessed to determine if the client's rental assistance needs to be extended for an additional 3 month period. If the ESG rental assistance is extended for an

additional 3 months, the ESG assistance is reduced or adjusted over the time that the client is receiving rental assistance and the client's portion of the rent should be 30% of their adjusted household income.

Clients assisted under ESG Re-housing Assistance are eligible to receive rental and utility assistance for up to 6 months if they meet income eligibility during the 6 month period. Re-housing clients must be evaluated at least once during the 6 month period. Monthly case management is highly recommended. The ESG rental assistance should be reduced gradually and the client's portion of the rent should be 30% of their adjusted household income by the end of the 6 month period.

**f. Standards to Determine Type, Amount, Duration and Limits**

Due to limited funds, Orange County will determine each fiscal year the maximum amount of total prevention or re-housing assistance to be given to clients in a given fiscal year. For fiscal year 2011-2012, the maximum amount per client for prevention services (including rent and utilities) is \$4,000. The maximum for re-housing services is \$5,000. These limits will be included in the project administration agreement with the sub-recipient.

For clients who are able to afford their rent and avoid eviction, if they are assisted with utility costs, the maximum prevention assistance for utilities may not exceed \$300 per month. The maximum period for utility arrears is 2 months. However, these clients must not have received LIHEAP assistance in the past six (6) months.

The following tables describe the specific activities, eligibility length of assistance and expenditure limits for Orange County's Homeless Prevention and Rapid Re-housing services under the ESG.

**Table 1: ORANGE COUNTY ESG HOMELESS PREVENTION ACTIVITIES**

<b>HOMELESS PREVENTION/ Housing Stabilization</b>				
<b>Activity</b>	<b>Purpose</b>	<b>Eligibility Criteria</b>	<b>Expenditure and Length of Assistance Limits</b>	<b>Comments</b>
<b>Case Management</b>	<p>To provide counseling to people who receive assistance and link them to other community services.</p> <p>Case management may include but not limited to budget and financial counseling, crisis intervention, legal services, social services referrals and relocation services, if necessary.</p>	<p>Client/Household must meet ESG definition for "at risk of homelessness"</p> <p>A Client/Household's total income must be below 30 percent of the Area Median Income (AMI) and cannot exceed 30 percent for the period of the ESG assistance.</p> <p>A client/household must be a resident of unincorporated Orange County or eligible municipality.</p>	<p>A client/household must receive at least an initial consultation and eligibility assessment.</p> <p>After the initial intake, the minimum case management requirement is one meeting per month.</p> <p>An evaluation and certification of ESG eligibility must be conducted at least once every 3 months.</p> <p>Case management may be extended after the ESG assistance terminates.</p>	<p>Case files and documentation are required to demonstrate that the subrecipient has assessed the client's eligibility, financial resources, housing stability efforts and referrals to support networks.</p>

**Continuation - TABLE 1: HOMELESS PREVENTION ACTIVITIES**

<b>HOMELESS PREVENTION/ Housing Stabilization</b>				
<b>Activity</b>	<b>Purpose</b>	<b>Eligibility Criteria</b>	<b>Expenditure and Length of Assistance Limits</b>	<b>Comments</b>
<b>Financial Assistance</b>	<p>To provide financial assistance related to housing stability.</p> <p>Eligible costs include utility arrears, rent arrears (if needed to obtain stabilization), moving costs when the client/household requires relocation, and other costs directly associated with housing stabilization.</p> <p>Utility assistance may be eligible but the client may not have received utility assistance in the past six months.</p>	<p>Client/Household must meet all the eligibility requirements established under Case Management eligibility criteria.</p>	<p>Financial Assistance under Homeless Prevention is one-time assistance. Maximum assistance for utility or rent arrears is two months.</p> <p>If it can be documented that the client will lose their housing and become literally homeless due to utility shut off, ESG may pay for utility costs; maximum assistance limits still apply.</p> <p>Due to the limited amount of funds available, the ESG assistance will not exceed \$1,000 per client, per month in combined ESG assistance. There is a maximum cap of ESG assistance per household of \$4,000 which includes tenant based rental assistance payments.</p>	<p>Case files must document the current housing status of the client.</p> <p>Client cannot be receiving subsidies, for the same type of assistance at the time of application or during the period of assistance.</p> <p>Generally, clients should be responsible for paying their own utility bills while provided rental assistance with ESG.</p>

**Continuation - TABLE 1: HOMELESS PREVENTION ACTIVITIES**

<b>HOMELESS PREVENTION/ Tenant Based Rental Assistance</b>				
<b>Activity</b>	<b>Purpose</b>	<b>Eligibility Criteria</b>	<b>Expenditure and Length of Assistance Limits</b>	<b>Comments</b>
<b>Short Term Rental Assistance</b>	To provide limited rental assistance to households at risk of homelessness.	<p>Client/Household must demonstrate that they will imminently lose their housing if they do not receive the ESG assistance (no recourse other than ESG assistance).</p> <p>Documentation/verification of eviction notice, valid lease, and landlord/residential ownership.</p> <p>Unincorporated residents of Orange County or eligible municipalities only.</p> <p>No Conflict of Interest (i.e. family leases, relative of case worker, etc.)</p>	<p>Up to \$800 in rental assistance based on the client's ability to pay. A minimum \$25 initial client contribution is required.</p> <p>The client's portion should increase gradually to advance stabilization.</p> <p>Maximum length of assistance is 3 months.</p> <p>Maximum cap of ESG assistance of \$1,000 per month and up to \$4,000 total assistance per household applies.</p>	<p>ESG Tenant Based Rental Assistance is not a substitute for Section 8 or a permanent rental subsidy program.</p> <p>The client must be re-certified within 3 months from the date on which the client receives financial assistance.</p> <p>Monthly case management required.</p>

**Continuation - Table 1: HOMELESS PREVENTION ACTIVITIES**

<b>HOMELESS PREVENTION/ Tenant Based Rental Assistance</b>				
<b>Activity</b>	<b>Purpose</b>	<b>Eligibility Criteria</b>	<b>Expenditure and Length of Assistance Limits</b>	<b>Comments</b>
<b>Medium Term Rental Assistance</b>	To extend rental assistance to clients experiencing acute financial hardship after following the terms of their short term (3 month) case management plan, and who are likely to reach stabilization if rental assistance is extended.	At the end of the third month of the short term rental assistance, clients must be re-assessed to determine if the client's rental assistance needs to be extended for an additional 3 month period.  Clients must continue to meet all eligibility criteria in regards to income and residency and should show progress and commitment to their stabilization case management plan. An extended rental assistance will likely result in stabilization.	The client's portion of the rent should increase gradually to advance stabilization. It is recommended that a client's portion of the rent should be at 30% of their adjusted household income by the end of the ESG assistance period to ease stabilization.  The maximum length of medium term assistance is 3 months (6 months total ESG rental assistance including short term assistance). Maximum cap of ESG assistance of \$1,000 per month and up to \$4,000 total assistance per household applies.	Case management is required on a monthly basis.

**Table 2: ORANGE COUNTY ESG RAPID RE-HOUSING ACTIVITIES**

<b>RAPID RE-HOUSING/ Housing Relocation and Stabilization</b>				
<b>Activity</b>	<b>Purpose</b>	<b>Eligibility Criteria</b>	<b>Expenditure and Length of Assistance Limits</b>	<b>Comments</b>
<b>Case Management</b>	<p>To provide re-housing services and case management, including access to mainstream services.</p> <p>Re-housing services include locating affordable housing, conducting housing habitability standards inspections, negotiating rent rates and deposits, and securing housing stability.</p> <p>Case management should focus on housing stabilization but may include linkage to services to address other needs such as legal assistance, education and health care.</p>	<p>1) The Client must be homeless according to ESG definition.</p> <p>2) Client must meet income eligibility requirements (total income must be below 30 percent of the Area Median Income (AMI)).</p> <p>3) Client must be a resident of unincorporated Orange County or eligible municipality.</p> <p>4) Client must lack the financial resources or support networks to obtain housing.</p>	<p>A client/household must receive at least an initial consultation and eligibility assessment.</p> <p>An evaluation and certification of ESG eligibility must be conducted at least once every 3 months.</p> <p>Case management may be extended after the ESG assistance terminates.</p>	<p>Case files and documentation are required to demonstrate that the subrecipient has assessed the client's eligibility, financial resources, housing stability efforts and referrals to support networks.</p>



**Continuation - TABLE 2: RAPID RE-HOUSING ACTIVITIES**

<b>RAPID RE-HOUSING/ Housing Relocation and Stabilization</b>				
<b>Activity</b>	<b>Purpose</b>	<b>Eligibility Criteria</b>	<b>Expenditure and Length of Assistance Limits</b>	<b>Comments</b>
<b>Financial Assistance</b>	<p>To provide financial assistance related to re-housing and stabilization.</p> <p>Eligible costs include utility deposits, moving costs and rent deposits.</p>	<p>Client/Household must meet all the eligibility requirements established under Case Management eligibility criteria.</p>	<p>Financial Assistance under Re-Housing is a one-time assistance.</p> <p>Due to the limited amount of funds available, the ESG assistance will not exceed \$1,000 per client, per month in combined ESG assistance.</p> <p>There is a maximum cap of ESG re-housing assistance per household of \$5,000 which includes tenant based rental assistance payments.</p>	<p>Case files must document the eligibility and housing status of client.</p> <p>Client cannot be receiving subsidies, for the same type of assistance at the time of application or during the period of assistance.</p> <p>Generally, clients should be responsible to pay their own utility bills while provided rental assistance with ESG.</p>

**Continuation - TABLE 2: RAPID RE-HOUSING ACTIVITIES**

<b>RAPID RE-HOUSING/ Tenant Based Rental Assistance</b>				
<b>Activity</b>	<b>Purpose</b>	<b>Eligibility Criteria</b>	<b>Expenditure and Length of Assistance Limits</b>	<b>Comments</b>
<b>Short Term Rental Assistance</b>	To provide limited rental assistance to households who have recently become homeless and are able to reach stabilization if rapidly re-housed.	Client must meet household income, housing status and homeless definition for rapid re-housing assistance.  Unincorporated residents of Orange County or eligible municipalities only.  No Conflict of Interest (i.e. family leases, relative of case worker, etc.)	Up to \$800 in rental assistance based on the client's ability to pay. A minimum \$25 initial client contribution is required. The client's portion should increase gradually to advance stabilization.  Maximum length of assistance is 3 months.  Maximum cap of ESG assistance of \$1,000 per month and up to \$5,000 total assistance per household applies.	ESG Tenant Based Rental Assistance is not a substitute for Section 8 or a permanent rental subsidy program.  A rent reasonableness assessment must be made prior to moving the client into the unit.  A habitability standards inspection must be conducted prior to moving the client into the unit.

**Continuation - TABLE 2: RAPID RE-HOUSING ACTIVITIES**

<b>RAPID RE-HOUSING/ Tenant Based Rental Assistance</b>				
<b>Activity</b>	<b>Purpose</b>	<b>Eligibility Criteria</b>	<b>Expenditure and Length of Assistance Limits</b>	<b>Comments</b>
<b>Medium Term Rental Assistance</b>	To extend rental assistance to clients experiencing acute financial hardship after following the terms of their short term (3 months) case management plan, and who are likely to reach stabilization if rental assistance is extended.	At the end of the third month of the short term rental assistance, clients must be re-assessed to determine if the client's rental assistance needs to be extended for an additional 3-month period.  Clients must continue to meet all eligibility criteria in regards to income and residency and should show progress and commitment to their stabilization case management plan. An extended rental assistance will likely result in stabilization.	The client's portion of the rent should increase gradually to advance stabilization. It is recommended that a client's portion of the rent should be at 30% of their adjusted household income by the end of the ESG assistance period to ease stabilization.  The maximum length of medium term assistance is 3 months (6 months total ESG rental assistance including short term assistance). Maximum cap of ESG assistance of \$1,000 per month and up to \$5,000 total assistance per household applies.	Case management is required on a monthly basis.

## **7. Sub-Awards**

The Orange County Housing and Community Development Division administered \$2.5 million dollars under the three year Homelessness Prevention and Rapid Re-housing Program (HPRP) that began in 2009. The new Emergency Solutions Grant Program has been designed to include many aspects of the HPRP. In addition, a number of public service providers have participated in administering the previous Emergency Shelter Grant within the community. The County anticipates that these service providers, who are currently participating in the ESG program, will utilize their experience, particularly in re-housing and homelessness prevention, to continue assisting homeless under the Emergency Solutions Grant program.

Each year, the County has solicited proposals from eligible, local non-profit agencies for the provision of homeless related ESG activities and services. To receive funding, sub recipients are required to execute an Agreement with Orange County for project administration. In preparation for the current fiscal year, 2011-2012, the Division solicited proposals for the initial ESG award of \$269,768. The County now anticipates awarding grants under the second allocation of \$151,745 subject to approval of this Substantial Amendment and the subsequent amendment of the 2011-2012 ESG Agreements with participating agencies. These agreements will include all requirements for administering ESG under the interim regulations. The Division will not use its second allocation of ESG dollars for the current year (FY 2011-2012) to fund any new agencies under the Emergency Solutions Grant. The Housing and Community Development Division will provide additional grant amounts to the current ESG subrecipients based on their current activities and consistent with eligible activities under the Interim Rule. Orange County will execute Agreements with current ESG sub recipients after notice from HUD of the approval of the Substantial Amendment and execution of the grant agreement.

## **8. Homeless Participation Requirement**

HUD has had an ongoing requirement for jurisdictions to facilitate participation of a homeless or formerly homeless person on boards and other bodies that may be involved in considering and making decisions and policies regarding homeless facilities, services, and other homeless assistance. Under the ESG interim regulations, jurisdictions that are not able to meet this requirement must show alternative actions taken to obtain the input of one or more homeless persons. As a county governed by an elected Mayor and Board of County Commissioners (BCC), Orange County does not meet this HUD requirement, but does follow an alternative action plan to obtain homeless input on all matters affecting the homeless. The BCC is the policy making entity for the county which considers, makes decisions, and approves matters relating to application for and use of federal funds, including the Emergency Solutions Grant. In addition, the County has an established Community Development Advisory Board (CDAB), which serves in an advisory capacity to the Housing and Community Development Division and in a liaison capacity with County residents on community development matters. Each BCC member appoints one citizen for their district, and the Mayor appoints one at-large member to the CDAB.

Orange County obtains the input of homeless participants in other ways. Through its participation in and collaboration with the local Continuum of Care (CoC), the County obtains input of a formerly homeless individual who serves on the Continuum's board, and other formerly homeless persons who provide input at CoC membership meetings from time to time. In addition, in keeping with its HUD approved Citizen's Participation Plan, during the

development of this Substantial Amendment, (and for all Consolidated and Annual Action Plans) a public notice was published in the local newspaper, and posted in various community locations (library, community centers, emergency shelters) accessed by homeless and at risk persons. This notice invited their comments, and their participation at the public hearing to discuss the amendment.

## **9. Performance Standards**

Based on previously discussed collaboration and consultation, and consideration of homeless factors in the local community, Orange County is proposing the following performance standards for the 2011-2012 Emergency Solutions Grant:

### **Performance Measures for Homelessness Prevention:**

- a. A reduction in the number of homeless households involving families with children within Orange County (a priority need for homeless assistance within the local Continuum of Care community).
- b. Expected Outcome: At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance provided under ESG.

### **Performance Measures for Homeless Rapid Re-Housing:**

- a. A reduction in the number of homeless households involving families with children, both sheltered and unsheltered, within Orange County (a priority need for homeless assistance within the local Continuum of Care community).
- b. Expected Outcome: At least 35% of participants assisted will remain in permanent housing six (6) months after the last assistance provided under ESG.

## **10. Certifications**

Required certifications are included with the plan.

### **C. Written Standards for Emergency Shelter and Street Outreach Activities**

In Orange County, street outreach activities were not proposed or funded by the first FY 2011-2012 ESG allocation, and there are no funds designated from the second ESG allocation for these activities during the remainder of the current grant year. Existing street outreach activities in Orange County are currently funded from other sources. After consulting with HUD, and considering local, ongoing, extenuating homeless needs, Orange County opted to use part of the second ESG allocation for emergency shelter activities, in addition to homelessness prevention and rapid re-housing activities, and funding of HMIS.

Orange County will ensure that the following standards are maintained by Emergency shelters funded with ESG that assist homeless individuals who meet the ESG eligibility criteria and are seeking shelter. Emergency shelters should:

- a. Ensure that the client meets the definition of homeless as established for the Emergency Solutions Grant, e.g. literally homeless, homeless under federal status, or fleeing or attempting to flee domestic violence
- b. Ensure client's household income is below 30 percent of Area Median Income (AMI) (except victims fleeing domestic violence)
- c. Ensure client provides agency with required documentation for identification, homeless status and program eligibility purposes; however, service providers may make exceptions under extenuating circumstances that warrant an extension of time permitted to provide documentation, and when serving victims fleeing domestic violence
- d. Provide shelter for clients for a period from one night to 30 days for emergency shelter, but this may be extended by the agency, if deemed necessary and if reasons are documented on file
- e. Provide special considerations to clients with special needs, or with the highest barriers to housing, including ensuring their safety while in emergency shelter
- f. Provide clients requiring special assistance not provided by the emergency shelter with such assistance as is needed identifying and accessing service providers that can meet their needs
- g. Provide and document notice of written termination for clients that refuse or fail to comply with program requirements, but should do so only in extenuating circumstances, after all efforts to resolve concerns have been exhausted.
- h. Record client's discharge and information as to destination, e.g. into permanent housing, as far as agency is able to determine this.

Orange County will ensure that the following standards are maintained by Emergency shelters funded with ESG that assist homeless individuals who meet the ESG eligibility criteria and are seeking or in need of essential services. Emergency shelters should:

- a. Conduct assessment of client needs and referrals to services available at the shelter to meet those needs that may include, but is not limited to, child care, education services, employment assistance, job training, legal services, life skills training, and transportation
- b. Provide case management at the emergency shelter that may include a centralized coordinated system with access, for example to health and mental health services, substance abuse treatment, counseling, mentoring, securing mainstream benefits and services, and safety planning for victims of domestic violence
- i. Include in case management the development of an individualized housing plan for permanent housing for client upon exit, and prioritizing housing of homeless families with children
- c. Record client's discharge and information as to destination, e.g. into permanent housing, as far as agency is able to determine this.

#### **D. Requirements for Recipients Using "at risk of homelessness" Definition**

Attachment 7 – Matrix to Assess Risk of Homeless and Self Sufficiency, provide details of the type of assessment and risk factors to be considered when determining risk of homelessness and self sufficiency levels of each client. In addition, Section 6.c of this Substantial Amendment outlines the Policies and Procedures for determining and prioritizing the clients that are at risk of homelessness and will be provided homeless prevention assistance.

## **E. Requirements for Optional Changes to FY 2011 Annual Action Plan**

### **1. Centralized or Coordinated Assessment System**

The Interim Rule introduces a proposed requirement for ESG recipients and subrecipients to use a centralized or coordinated system to initially assess the eligibility and needs of each individual or family who seeks homeless assistance or homeless prevention assistance. This centralized or coordinated system would be developed and implemented by the Continuum of Care in accordance with the minimum requirements established by HUD. It should be noted that during administration of the Homeless Prevention and Rapid Re-housing program (HPRP), Orange County used a centralized system (211) in coordination with the local United Way organization, which has been successful in matching individuals to homeless prevention and rapid re-housing services. The 211 system has been in operation for several years and continues to be heavily used. In addition, the HMIS, administered by the Homeless Services Network, and the Network itself continue to provide information concerning bed and service availability. Local agencies have also been developing partnerships and relationships that ensure that they obtain needed assistance for clients. For example, the Healthcare Center for the homeless, which receives some funding from the County, plays a significant and centralized role in the areas of health, mental health and substance abuse assessment, diversion, and counseling for the local homeless population and in collaboration with local service providers.

HUD is currently developing its minimum requirements for public review and comment in the upcoming proposed rule for the Continuum of Care program. At this time, Orange County is not required to use a centralized or coordinated assessment system until the Continuum of Care final rule has been published and until the Continuum of Care for the Central Florida area develops and implements a system that meets the minimum requirements in the final rule. However, many factors are in place, which indicate that a more centralized or coordinated assessment system can be developed in the near future.

### **2. Monitoring**

Orange County has an established monitoring system in place for the programs it administers. In the County, project monitoring is an ongoing process of reviewing a sub-recipient's performance in meeting goals, identifying program deficiencies, and of enhancing management capacity through technical assistance or other corrective actions. Activities selected for funding must meet eligibility requirements before they are funded. Following the notice of funding, Orange County conducts a technical assistance session for potential sub-recipients. In this session, sub-recipients learn details of specific program rules and regulations. On approval of the Substantial Amendment, the Housing and Community Development Division will prepare amendments to the Agreements with existing ESG sub-recipients. The amended Agreements will specify performance standards, goals, priorities, rules and regulations, certifications, approved budget, HUD ESG requirements, and monitoring requirements. Orange County will also conduct on site monitoring visits to its funded ESG agencies and provide technical assistance as needed. In addition to site monitoring the County will also conduct desk monitoring involving monthly subrecipient reports to ensure compliance with existing agreements. These reports must be submitted in a timely manner and are carefully reviewed. The Monitoring Forms for ESG is included as Attachment 7 in the List of attachments to this document.

# LIST OF ATTACHMENTS

- ATTACHMENT 1: PUBLIC NOTICES
- ATTACHMENT 2: PUBLIC COMMENTS
- ATTACHMENT 3: FY 2011-2012 DETAILED BUDGETS: AGENCY ALLOCATIONS  
DETAIL BUDGET: ALLOCATION BY ACTIVITIES
- ATTACHMENT 4: DOCUMENTATION CHECKLIST FOR  
PARTICIPANT INCOME ELIGIBILITY
- ATTACHMENT 5: DOCUMENTATION CHECKLIST FOR  
HOUSING UNIT ASSISTANCE
- ATTACHMENT 6: MATRIX TO ASSESS RISK OF  
HOMELESSNESS AND SELF SUFFICIENCY
- ATTACHMENT 7: MONITORING FORMS
- ATTACHMENT 8: SUBSTANTIAL AMENDMENT - STATE CLEARANCE LETTER
- ATTACHMENT 9: ESG SUBSTANTIAL AMENDMENT SUBMISSION CHECKLIST



**ATTACHMENT 1  
PUBLIC NOTICES**

**SUBSTANTIAL AMENDMENT  
ORANGE COUNTY EMERGENCY SOLUTIONS GRANT  
ANNUAL ACTION PLAN 2011-2012**

This notice advises the public of the amount awarded and proposed activities for the allocation of the 2011-2012 Emergency Solutions Grant. The Emergency Solutions Grant is provided by the U.S. Department of Housing and Urban Development (HUD) and administered in accordance with the McKinney-Vento Act, as amended by the Homeless Emergency and Rapid Transition to Housing (HEARTH) Act of 2009.

Orange County was initially awarded \$269,768, as a first allocation under the Emergency Shelter Grant Program, to provide essential services, operational costs at shelters, and prevention services for persons at risk of homelessness. On January 17, 2012, Orange County was awarded a second allocation of \$151,745 under the new Emergency Solutions Grant (ESG). This grant replaced the Emergency Shelter Grant to emphasize additional activities, such as the rapid re-housing of homeless individuals and families into permanent housing.

To receive the second allocation under the new ESG Program, Orange County must prepare a substantial amendment to its 2011-2012 Action Plan for submission to HUD no later than May 15, 2012. The ESG substantial amendment will provide information about the federal requirements, activities, budget and homeless strategies to be implemented upon approval by HUD.

The ESG amendment will be available for public comment from March 20, 2012 to April 20, 2012 at the Orange County Housing and Community Development Division, located at 525 E. South Street in Orlando, and at the Orlando Public Library located at 101 East Central Boulevard in Orlando, Florida. A public hearing on the substantial amendment will be held on March 21, 2012 at 6:00 p.m. at the Orange County Internal Operations Center, First Floor, Largo Training Room, 450 E. South Street, Orlando, Florida. Comments on the plan should be submitted in writing during the public comment period to: [nancy.sharifi@ocfl.net](mailto:nancy.sharifi@ocfl.net) or by mail to:

Orange County Housing and Community Development Division  
Attn: Nancy Sharifi, Program Manager  
525 E. South Street, Orlando, Florida 32801

Para información en Español, por favor llame al 407-836-5191 o por correo electrónico (E-mail) a [elizabeth.rico@ocfl.net](mailto:elizabeth.rico@ocfl.net)

**AVISO PÚBLICO**  
**Programa de Soluciones de Emergencia**  
**del Condado de Orange**  
**Año Fiscal 2011-2012**

Por medio de este aviso se informa al público el monto otorgado y las actividades propuestas para llevar a cabo con la cuota asignada al Programa de Soluciones de Emergencia del año 2011-2012. El Programa de Soluciones de Emergencia lo administra el Departamento de Vivienda y Desarrollo Urbano de los Estados Unidos (HUD por sus siglas en inglés) según la Ley McKinney-Vento, tal como la enmendó la Ley de Emergencia y Transición Rápida a Vivienda para personas ambulantes (HEARTH por sus siglas en inglés) de 2009.

Al Condado de Orange se le habían otorgado inicialmente \$269,768, como primera asignación bajo el Programa de Refugios de Emergencia, para brindar servicios esenciales, costos operativos para refugios y servicios de prevención para personas en riesgo de quedarse sin hogar. El 17 de enero de 2012, al Condado de Orange se le otorgó una segunda asignación de \$151,745 bajo el nuevo Programa de Soluciones de Emergencia (ESG por sus siglas en inglés). Este programa reemplazó al Programa de Refugios de Emergencia para enfatizar actividades adicionales, tales como la relocalización rápida a vivienda permanente para individuos y familias sin hogar.

Para recibir la segunda asignación bajo el nuevo Programa ESG, el Condado de Orange tiene que preparar una enmienda considerable al Plan de Acción de 2011-2012 para presentarla ante HUD a más tardar el 15 de mayo de 2012. La enmienda considerable al ESG brindará información sobre los requisitos federales, las actividades, el presupuesto y las estrategias para las personas sin hogar que se implementarán una vez recibida la aprobación por parte de HUD. La enmienda al ESG estará disponible para comentarios del público desde el 20 de marzo de 2012 hasta el 20 de abril de 2012 en la División de Vivienda y Desarrollo Comunitario del Condado Orange, ubicada en 525 E. South Street en Orlando, y en la Biblioteca Pública de Orlando ubicada en 101 East Central Boulevard, Orlando, Florida. Una audiencia pública sobre la enmienda significativa se llevará a cabo el 21 de marzo de 2012 a las 6:00 p.m. en Orange County Internal Operations Center, Primer Piso, Salón Largo, 450 E. South Street, Orlando, Florida. Los comentarios sobre el plan se deben presentar por escrito durante el período de comentarios del público a: nancy.sharifi@ocfl.net o por correo a:

Orange County Housing and Community Development Division  
Attn: Nancy Sharifi, Program Manager  
525 E. South Street, Orlando, Florida 32801

Para información en español, por favor llame al 407-836-5191 o por correo Electrónico a Elizabeth.Rico@ocfl.net .

La sección 266.0105 de los Estatutos de Florida estipula que si una persona decide apelar una decisión tomada por una junta directiva, agencia o comisión con respecto a algún asunto considerado en una reunión o audiencia, necesitará el acta del proceso y que, para dicho propósito, podría necesitar asegurar que se haga un acta al pie de la letra del proceso, dicha acta incluirá el testimonio y las pruebas sobre las cuales se basa la apelación. Conforme a la Ley de Estadounidenses con Discapacidades (ADA por su sigla en inglés), si alguna persona con discapacidad, tal como lo define la ley ADA, necesita acomodación especial para participar en el proceso, él o ella debe comunicarse con la División de Vivienda y Desarrollo Comunitario al 407-836-5191 a más tardar dos días hábiles antes del proceso.

Para más información en español, por favor llame a la División de Vivienda y Desarrollo Comunitario al número 407-836-5191.

# The Orlando Sentinel

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633 North Orange Avenue  
MP 132  
Orlando, FL 32801

Orange County Office of Community  
#814 150 006

To: Elizabeth Hico

This is to confirm that the advertisement for Orange County Office of Community published in *The Orlando Sentinel* on the following date.

Publication Date: Saturday, March 17, 2012

Ad Caption: 2011 ESG Amend.

Section: Zone - El Sentinel

Size: 3 columns x 10.50"

Job: #091 195 701

Should you need further information, please feel free to contact me.

Sincerely,



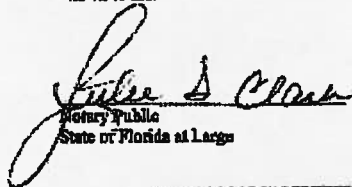
Aracelis Crespo  
Account Representative Assistant  
The Orlando Sentinel

/s/

---

State of Florida  
County of Orange

The foregoing instrument was acknowledged before me this 26<sup>th</sup> day of March 2012, by Aracelis Crespo, who is personally known to me.



Julie S. Clark  
Notary Public  
State of Florida at Large



303700202 00000000



HOUSING AND COMMUNITY DEVELOPMENT DIVISION

MITCHELL L. GLASSER, *Manager*

525 East South Street • Orlando, Florida 32801

407-836-5150 • Fax: 407-836-5193

www.OrangeCountyFL.net

March 19, 2012

Ms. Tracy Zampaglione, Public Relations Administrator  
Orange County Public Library  
3<sup>rd</sup> Floor,  
101 E. Central Blvd.  
Orlando, FL 32801

Subject: Orange County Draft Substantial Amendment to the Emergency Solutions Grant program included in the Action Plan for FY2011-2012

Dear Ms. Zampaglione:

Attached is the Draft Substantial Amendment to the Emergency Solutions Grant (ESG) program included in the Orange County Action Plan for FY2011-2012. We are asking that you place this document for **public review** from **March 20, 2012, through April 20, 2012**. The document is also available for review at Orange County Housing and Community Development Division, 525 East South Street, Orlando, Florida 32801.

The purpose of the public review period is to solicit input from the community concerning this Draft Substantial Amendment to the Emergency Solutions Grant program included in the Orange County Action Plan for FY2011-2012, which is due to be presented to the Orange County Board of County Commissioners on May 8, 2012. Orange County was initially awarded \$269,768 as a first funding allocation of ESG for FY 2011-2012. The Substantial Amendment pertains to a second allocation of \$151,745 to be also utilized for ESG activities during FY 2011-2012. This public review is in keeping with the Orange County Citizen Participation Plan and its established standards and guidelines for the process of public participation in the development of the Annual Action Plan. The Action Plan provides details of projects and activities proposed and/or being implemented each year within unincorporated Orange County with ESG and other funds from the United States Department of Housing and Urban Development (HUD). All comments received from citizens will be included with the Substantial Amendment and forwarded to HUD.

Comments from the public should be forwarded to the attention of Mitchell Glasser, Manager, Orange County Housing and Community Development Division; 525 E. South Street; Orlando, Florida 32801. Should you have additional questions, please contact Nancy Sharifi at (407) 836-0963 or Nancy.Sharifi@ocfl.net. Thank you for your assistance.

Sincerely,

A handwritten signature in black ink, appearing to read "Nancy Sharifi".

Nancy Sharifi,  
Program Manager,  
Housing and Community Development

Attachment

**ATTACHMENT 2**

**PUBLIC COMMENTS**

**SUBSTANTIAL AMENDMENT  
ORANGE COUNTY EMERGENCY SOLUTIONS GRANT  
ANNUAL ACTION PLAN 2011-2012**

There were no public comments received during the public comment period.

**ATTACHMENT 3  
FY 2011-2012 DETAILED BUDGETS: AGENCY ALLOCATIONS**

<b>DESCRIPTION</b>	<b>Initial 2011-2012 Budget</b>	<b>2nd Allocation</b>	<b>Revised 2011-2012 Budget</b>
<b>EMERGENCY SHELTER</b>			
<i>Shelter Operations</i>			
Coalition for the Homeless of Central Florida	\$62,000	\$22,772	\$84,772
Covenant House of Florida, Inc.	\$25,200	\$9,255	\$34,455
Harbor House of Central Florida, Inc.	<u>\$18,000</u>	<u>\$6,611</u>	<u>\$24,611</u>
<b>Subtotal Operations</b>	<b>\$105,200</b>	<b>\$38,638</b>	<b>\$143,838</b>
<i>Essential Services</i>			
Catholic Charities of Central Florida, Inc.	\$28,800	\$10,578	\$39,378
Family Promise of Greater Orlando, Inc.	<u>\$27,850</u>	<u>\$10,229</u>	<u>\$38,079</u>
<b>Subtotal Essential Services</b>	<b><u>\$56,650</u></b>	<b><u>\$20,807</u></b>	<b><u>\$77,457</u></b>
<b>TOTAL EMERGENCY SHELTER</b>	<b>\$161,850</b>	<b>\$59,445</b>	<b>\$221,295</b>
<b>HOMELESS PREVENTION</b>			
Heart of Florida United Way	\$72,918	\$0	\$72,918
Salvation Army	<u>\$35,000</u>	<u>\$22,925</u>	<u>\$57,925</u>
<b>Total Homeless Prevention</b>	<b>\$107,918</b>	<b>\$22,925</b>	<b>\$130,843</b>
<b>RADID RE-HOUSING</b>			
Heart of Florida United Way	\$0	<u>\$47,762</u>	<u>\$47,762</u>
<b>Total Rapid Re-housing</b>		<b>\$47,762</b>	<b>\$47,762</b>
<b>ADMINISTRATION</b>	<b>\$0</b>	<b>\$16,613</b>	<b>\$16,613</b>
<i>HMIS (Data Collection)</i>			
Homeless Services Network	\$0	\$5,000	\$5,000
<b>TOTAL ESG BUDGET</b>	<b>\$269,768</b>	<b>\$151,745</b>	<b>\$421,513</b>

**ATTACHMENT 3 - Continued  
DETAILED BUDGET: ALLOCATIONS BY ACTIVITIES**

<b>FY 2011 Detailed Budget Table</b>					
<b>First Allocation</b>	<b>\$269,768.00</b>	<b>FY 2011</b>			
<b>Second Allocation</b>	<b>\$151,745.00</b>	<b>Emergency Shelter Grants/Emergency Solutions Grants</b>			
<b>Grant Amount</b>	<b>\$421,513.00</b>	<b>Program Allocations</b>			
<b>Total Administration</b>	<b>\$16,613.00</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	\$161,850.00			\$161,850.00
	Rehab/Conversion				\$0.00
	Operations	\$105,200.00			\$105,200.00
	Essential Services	\$56,650.00			\$56,650.00
	Homelessness Prevention	\$107,918.00			\$107,918.00
	Administration	\$0.00			\$0.00
	<b>Emergency Shelter Grants Subtotal</b>	<b>\$269,768.00</b>			<b>\$269,768.00</b>
<b>Emergency Solutions Grants Program</b>	Emergency Shelter**			\$59,445.00	\$59,445.00
	Renovation**			\$0.00	\$0.00
	Operation**			\$38,638.00	\$38,638.00
	Essential Service**			\$20,807.00	\$20,807.00
	URA Assistance**			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS			\$5,000.00	\$5,000.00
	Rapid Re-housing		\$0.00	\$47,762.00	\$47,762.00
	Housing Relocation and Stabilization Services			\$7,762.00	\$7,762.00
	Tenant-Based Rental Assistance			\$40,000.00	\$40,000.00
	Project-Based Rental Assistance				\$0.00
	Homelessness Prevention		\$0.00	\$22,925.00	\$22,925.00
	Housing Relocation and Stabilization Services			\$10,000.00	\$10,000.00
	Tenant-Based Rental Assistance			\$12,925.00	\$12,925.00
	Project-Based Rental Assistance				\$0.00
	Administration			\$16,613.00	\$16,613.00
	<b>Emergency Solutions Grants Subtotal</b>			<b>\$0.00</b>	
			<b>Total Grant Amount:</b>		<b>\$421,513.00</b>

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

**ATTACHMENT 4  
DOCUMENTATION CHECKLIST FOR PARTICIPANT INCOME ELIGIBILITY**

ESG Participant Household Name: \_\_\_\_\_

Initial or Re-Assessment: <input checked="" type="checkbox"/>	Date:	Staff Initials:
<input type="checkbox"/> Initial Eligibility Assessment		
<input type="checkbox"/> Eligibility Re-Assessment		

<b>In File (Always Applicable)</b> <input checked="" type="checkbox"/>	<b>Documentation</b>
<input type="checkbox"/>	<b>COMPLETED INITIAL/RECERTIFICATION CONSULTATION</b> – ESG staff assessment with applicant/participant to determine eligibility and appropriate assistance type and amount (or recertify eligibility and reassess appropriate assistance type and amount).

<b>Applicable</b> <input checked="" type="checkbox"/>	<b>In File</b> <input checked="" type="checkbox"/>	<b>HOUSEHOLD INCOME</b> – Documentation of each identified source of current income for the household and documentation of household income calculation indicating household income at or below 30% Area Median Income
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>WAGES &amp; SALARY</b> <input type="checkbox"/> <b>Written Third Party:</b> Copy of most recent paystub(s) OR other written verification from employer -- OR -- <input type="checkbox"/> <b>Oral Third Party:</b> Verification of income form or other case file record of income information obtained verbally by ESG staff <input type="checkbox"/> Brief, written explanation by ESG staff for using oral third party -- OR -- <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of income statement <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>SELF EMPLOYMENT/BUSINESS INCOME</b> <input type="checkbox"/> <b>Written Third Party:</b> Copy of most recent federal or state tax return showing net business income -- OR -- <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of income statement <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>INTEREST &amp; DIVIDEND INCOME</b> <input type="checkbox"/> <b>Written Third Party:</b> Copy of most recent interest or dividend income statement OR Copy of most recent federal or state tax return showing interest, dividend or other net income -- OR -- <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of income statement <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>PENSION/RETIREMENT INCOME</b> <input type="checkbox"/> <b>Written Third Party:</b> Copy of most recent payment statement OR benefit notice OR bank deposit statement OR other written verification from income source -- OR --



Applicable <input checked="" type="checkbox"/>	In File <input checked="" type="checkbox"/>	<b>HOUSEHOLD INCOME</b> – Documentation of each identified source of current income for the household and documentation of household income calculation indicating household income at or below 30% Area Median Income
		<input type="checkbox"/> <b>Oral Third Party:</b> Verification of income form or other case file record of income information obtained by ESG staff <input type="checkbox"/> Brief, written explanation by ESG staff for using oral third party -- OR -- <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of income statement <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>UNEMPLOYMENT &amp; DISABILITY INCOME</b> <input type="checkbox"/> <b>Written Third Party:</b> Copy of most recent payment statement OR benefit notice OR bank deposit statement OR other written verification from income source -- OR -- <input type="checkbox"/> <b>Oral Third Party:</b> Verification of income form or other case file record of income information obtained by ESG staff <input type="checkbox"/> Brief, written explanation by ESG staff for using oral third party -- OR -- <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of income statement <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>TANF/PUBLIC ASSISTANCE</b> <input type="checkbox"/> <b>Written Third Party:</b> Copy of most recent payment statement OR benefit notice OR bank deposit statement OR other written verification from income source -- OR -- <input type="checkbox"/> <b>Oral Third Party:</b> Verification of income form or other case file record of income information obtained by ESG staff <input type="checkbox"/> Brief, written explanation by ESG staff for using oral third party -- OR -- <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of income statement <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>ALIMONY, CHILD SUPPORT AND FOSTER CARE INCOME</b> <input type="checkbox"/> <b>Written Third Party:</b> Copy of most recent payment statement OR benefit notice OR bank deposit statement OR other written verification from income source -- OR -- <input type="checkbox"/> <b>Oral Third Party:</b> Verification of income form or other case file record of income information obtained by ESG staff <input type="checkbox"/> Brief, written explanation by ESG staff for using oral third party -- OR -- <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>ARMED FORCES INCOME</b> <input type="checkbox"/> <b>Written Third Party:</b> Copy of most recent paystub(s) OR other written verification from employer -- OR -- <input type="checkbox"/> <b>Oral Third Party:</b> Verification of income form or other case file record of income information obtained by ESG staff

<b>Applicable</b> <input checked="" type="checkbox"/>	<b>In File</b> <input checked="" type="checkbox"/>	<b>HOUSEHOLD INCOME</b> – Documentation of each identified source of current income for the household and documentation of household income calculation indicating household income at or below 30% Area Median Income
		<input type="checkbox"/> Brief, written explanation by ESG staff for using oral third party -- OR -- <input type="checkbox"/> Self-Declaration: Applicant self-declaration form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>NO INCOME</b> <input type="checkbox"/> Self-Declaration: Applicant self-declaration form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration (e.g., "Applicant reports no current income.")

<b>In File</b> (Always Applicable) <input checked="" type="checkbox"/>	<b>HOUSEHOLD INCOME</b> – Documentation of each identified source of current income for the household and documentation of household income calculation indicating household income at or below 30% Area Median Income
<input type="checkbox"/>	<b>INCOME CALCULATION WORKSHEET</b> – Documentation showing income calculation (estimated annual income based on current income) and comparison to Area Median Income.

<b>Applicable</b> <input checked="" type="checkbox"/>	<b>In File</b> <input checked="" type="checkbox"/>	<b>HOUSING STATUS</b> - Documentation of the current living situation of the household.
<b>HOMELESS SITUATIONS [RAPID RE-HOUSING]</b>		
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>EMERGENCY SHELTER</b> <input type="checkbox"/> Written Third Party: ESG record of shelter stay OR homeless certification form OR emergency shelter provider letter
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>PLACE NOT MEANT FOR HUMAN HABITATION</b> <input type="checkbox"/> Written Third Party: Homeless certification form OR homeless street outreach provider or referral source letter -- OR -- <input type="checkbox"/> Self-Declaration: Applicant self-declaration of homelessness form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>HOSPITAL OR OTHER INSTITUTION</b> (if stay is 90 days OR less and was in emergency shelter or place not meant for human habitation prior to admission) <input type="checkbox"/> Written Third Party: Letter from hospital or other institution -- AND -- <input type="checkbox"/> Written Third Party: HMIS record of shelter stay (if previously sleeping in emergency shelter) OR homeless certification form OR emergency shelter or homeless street outreach provider letter -- OR -- <input type="checkbox"/> Self-Declaration: Applicant self-declaration of homelessness form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>TRANSITIONAL HOUSING</b> (if graduating from or timing out of) <input type="checkbox"/> Written Third Party: Homeless certification form OR transitional housing provider letter

Applicable <input checked="" type="checkbox"/>	In File <input checked="" type="checkbox"/>	<b>HOUSING STATUS</b> - Documentation of the current living situation of the household.
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>DOMESTIC VIOLENCE</b> <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of homelessness form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration (i.e., "Applicant is fleeing domestic violence situation.")
<b>HOUSED SITUATIONS [HOMELESSNESS PREVENTION]</b>		
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>COPY OF CURRENT LEASE OR OTHER WRITTEN OCCUPANCY AGREEMENT</b> – For applicant, if renting OR for their host family/friend if doubled up. NOTE: "N/A" should only be checked if applicant (or their host) is a homeowner or if applicant is staying in a hospital, other institution, or hotel/motel. – OR (if applicant is doubled up and attempt to obtain copy of host lease is unsuccessful) – <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of housing status form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>RENTED BY APPLICANT (select applicable situation)</b>  <u><b>POTENTIAL HOUSING LOSS DUE TO NON-PAYMENT OF RENT OR OTHER VIOLATION</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Copy of eviction notice or letter indicating intent to evict (typed or handwritten) from landlord/owner OR court order  <u><b>POTENTIAL HOUSING LOSS DUE TO UTILITY NON-PAYMENT</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Copy of utility shut-off notice – AND – <input type="checkbox"/> Lease indicates applicant is responsible for utilities and utility shut-off will cause eviction – OR – <input type="checkbox"/> Other evidence of housing being unfit for habitation due to utility shut-off (e.g., other third party provider assessment or ESG staff assessment)  <u><b>POTENTIAL HOUSING LOSS DUE TO FORECLOSURE ON RENTAL PROPERTY</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Copy of foreclosure notice from landlord/owner or other public record/publication  <u><b>POTENTIAL HOUSING LOSS DUE TO UNINHABITABLE CONDITIONS</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Copy of notice from landlord/property manager, public health, code enforcement, fire marshal, child welfare or other government entity that housing is condemned  <b>RECERTIFICATION ONLY (if other situations do not apply at recertification)</b> <u><b>POTENTIAL HOUSING LOSS DUE TO PRESENCE OF HOUSING RETENTION BARRIERS (e.g. insufficient income to pay housing costs, behavior that will potentially cause lease non-compliance, etc.).</b></u> <input type="checkbox"/> <b>Self-Declaration:</b> Brief, written description by ESG staff indicating current housing retention barriers and justification for continued ESG assistance, as recorded on assessment form
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>OTHER HOUSING OCCUPIED BY APPLICANT WITHOUT PAYING RENT (INCLUDING HOUSING SHARED WITH FRIENDS OR FAMILY) (select applicable situation)</b>  <u><b>POTENTIAL HOUSING LOSS DUE TO EVICTION (REQUEST TO LEAVE) BY HOST FRIEND OR FAMILY</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Copy of eviction notice or letter indicating request to leave (typed or handwritten) from host friend or family – OR –

Applicable <input checked="" type="checkbox"/>	In File <input checked="" type="checkbox"/>	<b>HOUSING STATUS</b> - Documentation of the current living situation of the household.
		<input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of housing status form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration <u><b>POTENTIAL HOUSING LOSS DUE TO FORECLOSURE ON RENTAL PROPERTY</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Copy of foreclosure notice from landlord/owner or other public record/publication <u><b>POTENTIAL HOUSING LOSS DUE TO UNINHABITABLE CONDITIONS</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Copy of notice from landlord/property manager, public health, code enforcement, fire marshal, child welfare or other government entity that housing is condemned
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>OWNED BY APPLICANT</b> – The program will not pay mortgage payments. If the household has recently lost their primary residence due to foreclosure and it has become homeless, it may be eligible for re-housing services. Must meet income guidelines and other requirements (must not own other real estate assets, etc.). <u><b>HOUSING LOSS DUE TO FORECLOSURE ON OWNER-OCCUPIED PROPERTY</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Copy of foreclosure notice from lending institution
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>HOSPITAL OR OTHER INSTITUTION</b> (if stay is less than 90 days AND previously in emergency shelter or place not meant for human habitation prior to admission) <u><b>POTENTIAL HOUSING LOSS DUE TO INSTITUTIONAL DISCHARGE</b></u> <input type="checkbox"/> <b>Written Third Party:</b> Statement from hospital or other institution
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>HOTEL/MOTEL</b> (Refer to McKinney Vento Act section 103(a)(3) and (5)(A)). <u><b>POTENTIAL HOUSING LOSS DUE TO NON-PAYMENT OF HOTEL/MOTEL COSTS</b></u> <input type="checkbox"/> <b>Self-Declaration:</b> Applicant self-declaration of housing status form <input type="checkbox"/> Brief, written explanation by ESG staff for using self-declaration

In File (Always Applicable) <input checked="" type="checkbox"/>	<b>OTHER HOUSING OPTIONS, FINANCIAL RESOURCES AND SUPPORT NETWORKS</b> - Documentation of whether household will become or remain homeless "but for" ESG assistance.
<input type="checkbox"/>	<b>OTHER SUBSEQUENT HOUSING OPTIONS</b> <input type="checkbox"/> <b>Self-Declaration:</b> Description of lack of other housing options as recorded on assessment form or other case file documentation (e.g., case notes) <input type="checkbox"/> Brief, written description by ESG staff indicating absence of appropriate and/or reasonable housing options sufficient to prevent or end homelessness
<input type="checkbox"/>	<b>FINANCIAL RESOURCES AND SUPPORT NETWORKS</b> <input type="checkbox"/> <b>Self-Declaration:</b> Description of lack of other financial resources and support networks as recorded on assessment form or other case file documentation (e.g., case notes) <input type="checkbox"/> Self-declaration includes current bank account balance(s) <input type="checkbox"/> Assessment and documentation (if applicable) of other assets, per ESG grantee asset policy, indicating allowable amount <input type="checkbox"/> Brief, written description by ESG staff indicating absence of financial resources and support networks sufficient to prevent or end homelessness
<input type="checkbox"/>	<b>SIGNED STAFF CERTIFICATION OF ELIGIBILITY FOR ESG ASSISTANCE</b>

<b>Applicable</b> <input checked="" type="checkbox"/>	<b>In File</b> <input checked="" type="checkbox"/>	<b>HOUSING STATUS</b> - Documentation of the current living situation of the household.
<b>Notes:</b>		

**ATTACHMENT 5  
DOCUMENTATION CHECKLIST FOR HOUSING UNIT ASSISTANCE**

ESG Participant Household Name: \_\_\_\_\_

<b>In File (Always Applicable)</b>		<b>Documentation</b>
<input type="checkbox"/>		<b>HOUSEHOLD MEMBER IDENTIFICATION</b> – Verification of each household member’s identity, per requirement/standard set by ESG grantee.
<input type="checkbox"/>		<b>ESG FINANCIAL ASSISTANCE NOT USED FOR SAME COST TYPE AND SAME PERIOD AS OTHER FEDERAL, STATE, LOCAL PROGRAM ASSISTANCE</b> – ESG staff assessment with participant to identify if other federal, state, local program is assisting with same cost type for same period.
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<b>ESG FINANCIAL ASSISTANCE</b> – 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"/>	<b>RENTAL ASSISTANCE</b> <input type="checkbox"/> Supporting documentation for expense (e.g., eviction letter, court documents, bill/invoice, etc.) <ul style="list-style-type: none"> <li><input type="checkbox"/> Rental arrears – supporting documentation. ESG payment may not exceed two months of arrears.</li> <li><input type="checkbox"/> Current/ongoing rental assistance – supporting documentation</li> <li><input type="checkbox"/> Rental application fees – supporting documentation</li> <li><input type="checkbox"/> Other ESG eligible fees/penalties (see ESG guidance/FAQs) – supporting documentation</li> </ul> -- AND -- <input type="checkbox"/> Copy of rental lease or occupancy agreement for unit assisted with ESG <ul style="list-style-type: none"> <li><input type="checkbox"/> Rental arrears – copy of lease or occupancy agreement</li> <li><input type="checkbox"/> Current/ongoing rental assistance – copy of lease or occupancy agreement</li> </ul> -- AND -- <input type="checkbox"/> Documentation indicating arrears assistance not greater than 2 months total -- AND -- <input type="checkbox"/> Documentation indicating total assistance (including arrears) not greater than 3 months without re-assessment ( 6 months total ESG assistance)
<input type="checkbox"/> YES  <input type="checkbox"/> NO	<input type="checkbox"/>	<b>UTILITY PAYMENT (only if client meets homeless or at risk of homeless eligibility)</b> <input type="checkbox"/> Supporting documentation for expense (e.g., shut-off notice, print-out from utility company, bill/invoice, etc.) <ul style="list-style-type: none"> <li><input type="checkbox"/> Utility arrears – supporting documentation, maximum 2 months assistance.</li> <li><input type="checkbox"/> Current/ongoing utility assistance – supporting documentation</li> <li><input type="checkbox"/> Other ESG eligible fees/penalties (see ESG guidance/FAQs) – supporting documentation</li> </ul> -- 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 2 months total -- AND -- <input type="checkbox"/> Documentation indicating assistance up to a period of 3 months and not greater than 6 months total after re-assessment

<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>SECURITY DEPOSIT (Housing Relocation or Re-housing services only)</b> <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"/>	<b>UTILITY DEPOSIT (Housing Relocation or Re-housing services only)</b> <input type="checkbox"/> Supporting documentation for expense (e.g., letter from utility company, bill/invoice, etc.) -- AND (if applicable)-- <input type="checkbox"/> If utility not in ESG participant name, other documentation indicating ESG participant responsibility for utility
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>MOVING COSTS (Housing Relocation or Re-housing services only)</b> <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"/>	<b>MOTEL/HOTEL VOUCHER (when paid by charitable organization; not paid by client, local, state or federal government)</b> <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)) -- AND -- <input type="checkbox"/> Documentation indicating subsequent housing identified but not yet available for move-in (e.g., copy of executed lease indicating lease start date, letter from landlord/owner indicating intent to lease and start date) -- AND -- <input type="checkbox"/> Documentation indicating assistance not greater than thirty (30) days or until participant is in housing, which ever occurs sooner
<b>Notes:</b>		

Applicable	In File	
<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<b>HOUSING UNIT</b> - Documentation showing ESG assistance used for eligible housing unit.
<input type="checkbox"/> YES <input type="checkbox"/> NO	<input type="checkbox"/>	<b>RENT REASONABLENESS</b> – 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"/>	<b>HABITABILITY STANDARDS INSPECTION</b> – 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"/>	<b>LEAD-BASED PAINT INSPECTION</b> – 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

<b>Applicable</b> <input checked="" type="checkbox"/>	<b>In File</b> <input checked="" type="checkbox"/>	<b>HOUSING UNIT</b> - Documentation showing ESG assistance used for eligible housing unit.
<input type="checkbox"/> <b>NO</b>		or pregnant woman in household. <input type="checkbox"/> Documentation indicating unit passed lead-based paint inspection.
<b>Notes:</b>		



**ATTACHMENT 6**  
**MATRIX TO ASSESS RISK OF HOMELESSNESS AND SELF-SUFFICIENCY**  
 (Sample Form to Assess Risk of Homelessness and Self Sufficiency)

Client Name: \_\_\_\_\_

Date: \_\_\_\_\_ Client #: \_\_\_\_\_

<b>DOMAIN</b>	<b>1 - In Crisis</b>	<b>2 - Vulnerable</b>	<b>3 - Safe</b>	<b>4 - Building Capacity</b>	<b>5 - Empowered</b>
<b>Income</b> (parenthesis comment for income support)	No income.	Inadequate income and/or spontaneous or inappropriate spending.	Can meet basic needs with subsidy; appropriate spending. (Income supports w additional income needs)	Can meet basic needs and manage debt without assistance. ( has balanced budget & expenses)	Income is sufficient, well managed; has discretionary income and is able to save.
<b>Employment</b> (Skip if Unemployable)	No job.	Temporary, part-time or seasonal; inadequate pay, no benefits.	Employed full time; inadequate pay; few or no benefits.	Employed full time with adequate pay and benefits.	Maintains permanent employment with adequate income and benefits. (1 yr or more ongoing)
<b>Housing</b>	Homeless or threatened with eviction.	In transitional, temporary or substandard housing; and/or current rent/mortgage payment is unaffordable (> 30% of income). Household is on food stamps.	In stable housing that is safe but only marginally adequate.	Household is in safe, adequate subsidized housing.	Household is safe, adequate, unsubsidized housing.
<b>Food</b>	No food or means to prepare it. Relies to a significant degree on other sources of free or low-cost food.	Household is on food stamps.	Can meet basic food needs, but requires occasional assistance.	Can meet basic food needs without assistance.	Can choose to purchase any food household desires.
<b>Childcare</b> Skip if no age appropriate children	Needs childcare, but none is available/ accessible, and/or child is not eligible.	Childcare is unreliable or unaffordable, inadequate supervision is a problem for childcare that is available.	Affordable subsidized childcare is available, but limited.	Reliable, affordable childcare is available, no need for subsidies.	Able to select quality childcare of choice.
<b>Children's Education</b> Skip if no school age children	One or more eligible children not enrolled in school.	One or more eligible children enrolled in school, but not attending classes.	Enrolled in school, but one or more children only occasionally attending classes.	Enrolled in school and attending classes most of the time.	All eligible children enrolled and attending on a regular basis.
<b>Adult Education / Literacy</b>	Literacy problems and/or no high school diploma/GED are serious barriers to employment.	Enrolled in literacy and/or GED program and/or has sufficient command of English to where language is not a barrier to employment.	Has high school diploma/GED.	Needs additional education or training to improve employment situation and/or to resolve literacy problems to where they are able to function effectively in society.	Has completed education/training needed to become employable. No literacy problems.

<b>DOMAIN</b>	<b>1 - In Crisis</b>	<b>2 - Vulnerable</b>	<b>3 - Safe</b>	<b>4 - Building Capacity</b>	<b>5 - Empowered</b>
<b>Legal</b>	Current outstanding tickets or warrants of other unresolved legal issues.	Current charges/trial pending. Noncompliance with probation/parole/ legal issues impacting housing.	Fully compliant with probation/parole terms or working on other plan to resolve other legal issues.	Has successfully completed probation/parole within past 12 months, no new charges filed or recently resolved other legal issues.	No active legal issues in more than 12 months and/or no felony criminal history.
	Circle legal issues impacting housing: Sex Offender, Drug Charges, Violent Crimes, Civil Judgments, Custody, Family Law, Credit Issues/Judgments, Bankruptcy				
<b>Health Care</b>	No medical coverage with immediate need.	No medical coverage and great difficulty accessing medical care when needed. Some household members may be in poor health.	Some members (e.g. Children) on ABW or MiChild.	All members can get medical care when needed, but may strain budget.	All members are covered by affordable, adequate health insurance.

To determine Life Skills Rating (Page 2 - BELOW), rate the following areas 1 to 5 and use the most frequent rating for the overall on Page 2: hygiene, food preparation, time management, high risk behaviors, money management, basic communication including response to authority, and anger management. (RATING SCALE: 1- In Crisis, 2- Vulnerable, 3 - Safe, 4 - Building Capacity, 5 - Empowered) This refers to skills rather than access.

<b>Life Skills (Use Guidance Above)</b>	Unable to meet basic needs such as hygiene, food, activities of daily living. <b>1 - In Crisis</b>	Can meet a few but not all needs of daily living without assistance. <b>2 - Vulnerable</b>	Can meet most but not all daily living needs without assistance. <b>3 - Safe</b>	Able to meet all basic needs of daily living without assistance. <b>4 - Building Capacity</b>	Able to provide beyond basic needs of daily living for self and family. <b>5 - Empowered</b>
<b>Mental Health</b>	Danger to self or others; recurring suicidal ideation; experiencing severe difficulty in day-to-day life due to psychological problems.	Recurrent mental health symptoms that may affect behavior, but not a danger to self/others; persistent problems with functioning due to mental health symptoms.	Mild symptoms may be present but are transient; only moderate difficulty in functioning due to mental health problems.	Minimal symptoms that are expectable responses to life stressors; only slight impairment in functioning.	Symptoms are absent or rare; good or superior functioning in wide range of activities; no more than every day problems or concerns.
<b>Substance Abuse</b>	Meets criteria for severe abuse/dependence; resulting problems so severe that institutional living or hospitalization may be necessary.	Meets criteria for dependence; preoccupation with use and/or obtaining drugs/alcohol; withdrawal or withdrawal avoidance behaviors evident; use results in avoidance or neglect of essential life activities.	Use within last 6 months; evidence of persistent or recurrent social, work, emotional or physical problems related to use (such as disruptive behavior or housing problems); problems have persisted for at least one month.	Client has used during last 6 months, but no evidence of persistent or recurrent social, occupational, emotional, or physical problems related to use; no evidence of recurrent dangerous use.	No drug use/alcohol abuse in last 6 months.

<b>Family/Friends (Social) Relations</b>	Lack of necessary support from family or friends; abuse (DV, child) is present or there is child neglect.	Family/friends may be supportive, but lack ability or resources to help; family members do not relate well with one another; potential for abuse or neglect.	Some support from family/friends; family members acknowledge and seek to change negative behaviors; are learning to communicate and support.	Strong support from family or friends. Household members support each other's efforts.	Has health/expanding support network; communication is consistently open.
<b>Mobility</b>	No access to transportation, public or private; may have car that is inoperable.	Transportation is available, but unreliable, unpredictable, unaffordable; may have car but no insurance, license, etc.	Transportation is available and reliable, but limited and/or inconvenient; drivers are licensed and minimally insured.	Transportation is generally accessible to meet basic travel needs.	Transportation is readily available and affordable; car is adequately insured.
<b>Community Involvement (Club, Church, Team, Support Group, etc).</b>	Not applicable due to crisis situation; in "survival" mode.	Socially isolated and/or no social skills and/or lacks motivation to become involved.	Lacks knowledge of ways to become involved.	Some community involvement but has barriers such as transportation, childcare issues	Actively involved in community.
<b>Safety</b>	Home or residence is not safe; immediate level of lethality is extremely high; possible CPS involvement	Safety is threatened temporary protection is available; level of lethality is high	Current level of safety is minimally adequate; ongoing safety planning is essential	Environment is safe, however, future of such is uncertain; safety planning is important	Environment is apparently safe and stable
<b>Credit (Opt)</b>	Bankruptcies/Foreclosures/Evictions	Outstanding Judgments/Garnishments	Needs a Credit Repair Plan	Moderate Budgeting Skills	Manageable Budget and Ability to Save.
<b>Disabilities (Optional)</b>	In crisis - acute or chronic symptoms affecting housing, employment, social interactions, etc always.	Vulnerable- sometimes has acute or chronic symptoms affecting housing, employment, social interactions, etc.	Safe - rarely has acute or chronic symptoms affecting housing, employment, social interactions, etc.	Building Capacity - asymptomatic condition may be controlled by services and/or medication.	Thriving - No identified disability.

Self Sufficiency Matrix provided by Heart of Florida United Way

**ATTACHMENT 7  
MONITORING FORMS**

Project monitoring is an ongoing process of reviewing a sub-grantee's performance in meeting goals, identifying program deficiencies, and of enhancing management capacity through technical assistance or other corrective actions.

**Organization:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Reviewer(s):**  
\_\_\_\_\_

Person(s) Interviewed	Title

**Who is in charge of the day-to-day administration of the program?** \_\_\_\_\_

**Last Review/Date** \_\_\_\_\_  
**Summary of Findings/Concerns / Good Practices:**  
 \_\_\_\_\_

**Current Review/date** \_\_\_\_\_  
**Summary of Findings/Concerns/ Good Practices:**  
 \_\_\_\_\_

Letter Mailed	Agency Received Letter	Agency is In Compliance
	Yes <input type="checkbox"/> No <input type="checkbox"/>	Yes <input type="checkbox"/> No <input type="checkbox"/>
<b>Reviewer's Signature(s):</b> _____		<b>Date:</b> _____



i. Is sub grantee submitting reimbursement requests in a timely manner? Is the rate of draw downs consistent with the point-in-time expenditures for the grant term according to their project projections?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------

ii. Has sub grantee remained consistent in number of households served, according to their project projections?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------



i. Does the program have an Operational policy, outlining the program?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

ii. Does the program have an Eligibility policy, including provisions for ineligible clients?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------

iii. Does the program have a Confidentiality policy, safeguarding individual's information and records?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------

iv. Does the program have a Termination policy?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------

v. Does the program have a Complaints / Appeals Procedure?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

vi. Does the program have an Equal Opportunities policy, which includes provisions under the Fair Housing Act?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

vii. Does the program have a procedure to approve housing that includes Lead Based Paint inspections, Habitability Standards, and Rent Reasonableness?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

viii. Does the program have a written Reimbursement procedure that meets the ESG good practices?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

ix. Does the organization follow the Drug Free Workplace requirements?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
--	------------------------------	-----------------------------

x. Is the organization a religious organization, and if so, does it offer all ESG services, regardless of religion or religious belief?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
---	------------------------------	-----------------------------

**Further Information:**

[Empty text area for further information]



i. Agency has original invoices and canceled checks on file for expenses submitted for reimbursement.

Yes  No

**Describe Basis for Conclusion:**

[Empty text area for describing basis for conclusion]

ii. Is there a system for tracking payables to assure that reimbursements are not duplicated?

Yes  No

**Describe Basis for Conclusion:**

[Empty text area for describing basis for conclusion]

iii. Agency keeps a master spreadsheet to document vendor payments.

Yes  No

**Describe Basis for Conclusion:**

[Empty text area for describing basis for conclusion]

iv. Agency is justifying how time/expenses are divided between ESG activities and ESG paid staff.	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

**Describe Basis for Conclusion:**

v. Agency has adequate written financial management policies and procedures.	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

**Describe Basis for Conclusion:**

vi. Agency stores all ESG documents in a secured area.	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

**Describe Basis for Conclusion:**

vii. Reimbursement Requests are submitted in a timely manner.	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

**Describe Basis for Conclusion:**

viii. Reconciliation of Bank statements is current.	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

**Further Information:**



i. Is there a list of active authorized HMIS users?	Yes <input type="checkbox"/> No <input type="checkbox"/>
ii. Do HMIS users have access to adequate computer technology and tools, such as internet access, printers, data analysis software, etc.?	Yes <input type="checkbox"/> No <input type="checkbox"/>
iii. Do computers used to access the HMIS have a locking screen saver?	Yes <input type="checkbox"/> No <input type="checkbox"/>
iv. Does the agency have a privacy policy?	Yes <input type="checkbox"/> No <input type="checkbox"/>
v. Is there a Release of information on file for clients?	Yes <input type="checkbox"/> No <input type="checkbox"/>
vi. Agency submits HMIS information for Quarterly Reports in a timely manner	Yes <input type="checkbox"/> No <input type="checkbox"/>
vii. Agency submits programmatic reports or narratives in addition to HMIS	Yes <input type="checkbox"/> No <input type="checkbox"/>



i. How often are there staff meetings to discuss client progress/ESG issues?	
--	--

ii. Does agency have an updated Resource Directory for referrals?	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

iii. How long after intake or discharge does it take to enter client information into HMIS?	_____ days
---	------------

iv. Does the client have an updated Household Income eligibility chart?	Yes <input type="checkbox"/> No <input type="checkbox"/>
---	--

v. Are there household defined goals in the case management notes with progress updates?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--



vi. If the client has left the program, has there been an attempt to make a follow up?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

**Further Information:**



<b>File No:</b>	<b>Program Entry Date:</b>
<b>Client Last Name:</b>	<b>Program Exit Date:</b>

**Landlord , Name and Address:**

<p><b>i. Has the client been shown to pass the 4 tests of eligibility?</b></p> <ul style="list-style-type: none"> <li>a) Initial assessment to determine the appropriate type of assistance to meet their needs.</li> <li>b) The household must be at or below 30 percent of Area Median Income (AMI).</li> <li>c) Documentation exists to show the household is either homeless or at risk of losing its housing and meet both of the following circumstances: (1) no appropriate subsequent housing options have been identified; AND (2) the household lacks the financial resources and support networks needed to obtain immediate housing or remain in its existing housing</li> <li>d) Be appropriate for case management and 'stable housing outcome' following the assistance.</li> </ul>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p> <p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
--	---

ii. Does the client file show applications and forms signed off?	Yes <input type="checkbox"/> No <input type="checkbox"/>
--	--

iii. If client is enrolled for more than 3 months has sub grantee submitted re-evaluation of eligibility evidence?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
--	--

iv. Has client received less than 6 months assistance in accordance to Orange County's agreement?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
---	--



Is short term rental assistance 90 days or less? Is medium term rental assistance 6 months or less?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
---	--

Has sub-grantee documented rent reasonableness?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
---	--

For re-housing assisted clients, has the client's property been inspected as per the ESG Habitability Standards?	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
--	--

For re-housing clients, if client is relocated to a unit built prior to 1979, has the Client's property been inspected as per Lead Based Paint Requirements	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
---	--

Is utility assistance 2 months or less? (per Agreement)	Yes <input type="checkbox"/> No <input type="checkbox"/> N/A <input type="checkbox"/>
---	--

Are rental or utility arrears less than 2 months? Are they counted as part of the 3 months service?

Yes  No   
N/A

Are any storage arrangements less than 3 months?

Yes  No   
N/A

Are motels / hotels used for 30 days or less?

Yes  No   
N/A

For clients about to exit the program: Has the client received regular case management services including an individualized service plan towards exiting the program?

Yes  No   
N/A

**Further Information:**

Empty text area for providing further information.

## ATTACHMENT 8

### SUBSTANTIAL AMENDMENT - STATE CLEARANCE LETTER

**From:** Milligan, Lauren [mailto:Lauren.Milligan@dep.state.fl.us]  
**Sent:** Friday, March 30, 2012 2:43 PM  
**To:** Sharifi, Nancy  
**Cc:** Hall, Mary  
**Subject:** Orange County CDBG Action Plan Amendment - State Clearance Letter

Ms. Nancy Sharifi, Program Manager  
Orange County Housing and  
Community Development Division  
525 E. South Street  
Orlando, FL 32801

RE: Department of Housing and Urban Development – Community Development Block Grants – Substantial Amendment to Orange County FY 2011-2012 Consolidated Plan/Action Plan – Orange County, Florida.

SAI # FL201203306177 (Reference SAI # FL201107205876C)

Dear Ms. Sharifi:

Florida State Clearinghouse staff has received and reviewed the referenced HUD CDBG consolidated plan/action plan amendment under the following authorities: Presidential Executive Order 12372; Section 403.061(42), *Florida Statutes*; the Coastal Zone Management Act, 16 U.S.C. §§ 1451-1464, as amended; and the National Environmental Policy Act, 42 U.S.C. §§ 4321-4347, as amended.

Section 4 of Gubernatorial Executive Order 95-359 states that federal applications originating from non-state agencies – such as local governments and non-profit organizations – for projects that will have no significant impact on Florida's environment are exempt from the intergovernmental coordination and review process administered by the State Clearinghouse. We have determined that the captioned Emergency Solutions Grant housing assistance activities meet the exemption requirements. Accordingly, you may forward the application to the federal funding agency without additional state review.

If you have any questions regarding this message or the state intergovernmental review process, please don't hesitate to contact me at (850) 245-2170 or [Lauren.Milligan@dep.state.fl.us](mailto:Lauren.Milligan@dep.state.fl.us). Thank you.

Yours sincerely,

Lauren P. Milligan, Environmental Manager  
Florida State Clearinghouse  
Florida Department of Environmental Protection  
3900 Commonwealth Blvd, M.S. 47  
Tallahassee, FL 32399-3000  
ph. (850) 245-2170 fax (850) 245-2190

## ATTACHMENT 9

### ESG SUBSTANTIAL AMENDMENT SUBMISSION CHECKLIST

The substantial amendment must be prepared and submitted in accordance with the recipient's citizen participation plan and the requirements of 24 CFR Part 91, as amended by the Interim Rule. The following outline is provided as a checklist to ensure an accurate and complete submission in accordance with the details of this Notice.

#### A. Requirements for Preparation

##### 1. Consultation

- Consult with Continuum(s) of Care within the geographic area on:
  - Determining how to allocate ESG funds for eligible activities;
  - Developing the performance standards for activities funded under ESG; and
  - Developing funding, policies, and procedures for the operation and administration of the HMIS.

##### 2. Citizen Participation

- Follow existing citizen participation plan for completing a substantial amendment.

#### B. Required Contents of Substantial Amendments

##### 1. SF-424

##### 2. Summary of Consultation Process

- Describe how the recipient consulted with the Continuum(s) of Care on:
  - Determining how to allocate ESG funds for eligible activities;
  - Developing the performance standards for activities funded under ESG; and
  - Developing funding, policies, and procedures for the operation and administration of the HMIS.

##### 3. Summary of Citizen Participation Process

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

##### 4. Match

- Describe:
  - Types of cash and/or non-cash resources used as match
  - Specific amounts of resources used as match
  - Proposed uses of match resources

##### 5. Proposed Activities and Overall Budget

- Proposed Activities

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

- Corresponding priority needs from recipient's Annual Action Plan
- Concise description of the activity, including the number and types of person to be served
- Corresponding standard objective and outcome categories

- Start date and completion date
  - ESG and other funding amounts
  - Local governments and territories are required, and states are encouraged to include the following details for each proposed activity:
    - One or more performance indicators
    - Projected accomplishments, in accordance with each performance indicator, to be made over the period for which the grant will be used for that activity
  - Discussion of Funding Priorities
    - Explain why the recipient chose to fund the proposed activities at the amounts specified (recommended: if available, use locally-relevant data to support the funding priorities, and explain how the funding priorities will support the national priorities established in Opening Doors: Federal Strategic Plan to Prevent and End Homelessness)
    - Identify any obstacles to addressing underserved needs in the community.
  - Detailed Budget
    - Include detailed budget of planned activities and funding levels accounting for entire second allocation and any reprogrammed funds from the first allocation
6. Written Standards for Provision of ESG Assistance
- If the recipient is a metropolitan city, urban county, or territory, include written standards for providing the proposed assistance.
  - If the recipient is a state, include written standards for providing the proposed assistance or describe the requirements for subrecipients to establish and implement written standards. Written standards must include:
    - Standards policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG
    - Policies and procedures for coordination among emergency shelter providers, essential service providers, homeless prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
    - 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
    - Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.
    - Standards for determining how long a particular program participant will be provided with rental and whether and how the amount of that assistance will be adjusted over time.
    - Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, or the maximum number of times the program participants may receive assistance.

## 7. Describe Process for Making Sub-Awards

## 8. Homeless Participation Requirement

### 9. Performance Standards

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

### 10. Certifications

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

1. If the recipient is a metropolitan city, urban county, or territory: include written standards for providing the proposed assistance.
2. If the recipient is a state, either (1) include written standards for providing the proposed assistance or (2) describe the requirements for subrecipients to establish and implement written standards. The written standards must include:
  - If funding essential services related to street outreach with second allocation: standards for targeting and providing these services.
  - If funding any emergency shelter activities with second allocation: 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 and persons with the highest barriers to housing.
  - If funding essential services related to emergency shelter with second allocation: policies and procedures for assessing, prioritizing, and reassessing individual and families' needs for essential services related to emergency shelter.

## D. Requirements for recipients who plan to use the risk factor under paragraph (1)(iii)(G) of the "at risk of homelessness" definition

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

## E. Requirements for Optional Changes to the FY 2011 Annual Action Plan

### 1. Centralized or Coordinated Assessment System

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

### 2. Monitoring

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

APPROVED  
 BY ORANGE COUNTY BOARD  
 OF COUNTY COMMISSIONERS

APPLICATION FORM MAY 08 2012 *LF/CMS*  
 FEDERAL ASSISTANCE

OMB Approved No. 3076-0006

Version 7/03

1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input checked="" type="checkbox"/> Non-Construction	Pre-application	2. DATE SUBMITTED May 15, 2012	Applicant Identifier 200206122180C
	<input type="checkbox"/> Construction	3. DATE RECEIVED BY STATE March 20, 2012	State Application Identifier N/A
	<input type="checkbox"/> Non-Construction	4. DATE RECEIVED BY FEDERAL AGENCY May 15, 2012	Federal Identifier S-11-UC-120015

5. APPLICANT INFORMATION

Legal Name: Orange County Board of County Commissioners	Organizational Unit: Department: Community and Environmental Services
Organizational DUNS: 064797251	Division: Housing and Community Development
Address: Street: 525 E. South Street	Name and telephone number of person to be contacted on matters involving this application (give area code) Prefix: First Name: Mitchell
City: Orlando	Middle Name
County: Orange	Last Name Glasser
State: FL	Zip Code 32801
Country: USA	Email: Mitchell.Glasser@ocfl.net

6. EMPLOYER IDENTIFICATION NUMBER (EIN):

59-6000773

8. TYPE OF APPLICATION:  
 New  Continuation  Revision  
 If Revision, enter appropriate letter(s) in box(es)  
 (See back of form for description of letters.)  
 Other (specify)  
 Substantial Amendment to Current ESG Grant

7. TYPE OF APPLICANT: (See back of form for Application Types)  
 Local Government County  
 Other (specify)

9. NAME OF FEDERAL AGENCY:  
 Housing and Urban Development

10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:  
 14-231

TITLE (Name of Program):  
 Emergency Solutions Grant

11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:  
 The Emergency Solutions Grant (ESG) provides funding for Rapid Re-Housing, Homeless Prevention, Emergency Shelter, Street Outreach, Administration and HMIS Administration activities.

12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.):  
 Orange County, Florida

13. PROPOSED PROJECT

Start Date: 5/12	Ending Date: 12/13
---------------------	-----------------------

14. CONGRESSIONAL DISTRICTS OF:  
 a. Applicant 3,7,8      b. Project 3,7,8

15. ESTIMATED FUNDING:

a. Federal	\$	151,745 <sup>00</sup>
b. Applicant	\$	<sup>00</sup>
c. State	\$	<sup>00</sup>
d. Local	\$	<sup>00</sup>
e. Other	\$	<sup>00</sup>
f. Program Income	\$	<sup>00</sup>
g. TOTAL	\$	151,745 <sup>00</sup>

16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?  
 a. Yes.  THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON  
 DATE: March 2012  
 b. No.  PROGRAM IS NOT COVERED BY E. O. 12372  
 OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW

17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?  
 Yes If "Yes" attach explanation.  No

18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.

a. Authorized Representative

Prefix	First Name Teresa	Middle Name	Phone Number (give area code) (407)836-5190
Last Name Jacobs	Date Signed 5.8.12		

b. Title  
 Orange County Mayor

d. Signature of Authorized Representative *[Signature]*





## CERTIFICATIONS

In accordance with the applicable statutes and the regulations governing the consolidated plan regulations, the jurisdiction certifies that:

**Affirmatively Further Fair Housing** – The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard.

**Anti-displacement and Relocation Plan** – It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

**Drug Free Workplace** -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about –
  - (a) The dangers of drug abuse in the workplace;
  - (b) The grantee's policy of maintaining a drug-free workplace;
  - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
  - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
  - (a) Abide by the terms of the statement; and
  - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
  - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
  - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.


**Anti-Lobbying** -- To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.


**Authority of Jurisdiction** -- The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

**Section 3** -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

  
 Signature/Authorized

5.8.12  
 Date

  
 Orange County Mayor  
 Title

## Specific CDBG Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated housing and community development plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that provide decent housing, expand economic opportunities primarily for persons of low and moderate income. (See CFR 24 570.2 and CFR 24 part 570)

**Following a Plan** -- It is following a current consolidated plan (or Comprehensive Housing Affordability Strategy) that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

1. **Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it certifies that it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low and moderate income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include activities which the grantee certifies are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available);
2. **Overall Benefit.** The aggregate use of CDBG funds including section 108 guaranteed loans during program year(s) **2011, 2012, 2013** (a period specified by the grantee consisting of one, two, or three specific consecutive program years), shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period;
3. **Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds including Section 108 loan guaranteed funds by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

The jurisdiction will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108, unless CDBG funds are used to pay the proportion of fee or assessment attributable to the capital costs of public improvements financed from other revenue sources. In this case, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds. Also, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and
2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

**Compliance With Anti-discrimination laws** -- The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 USC 2000d), the Fair Housing Act (42 USC 3601-3619), and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, subparts A, B, J, K and R;

**Compliance with Laws** -- It will comply with applicable laws.

*By Dalehanda*  
Signature/Authorized

5.8.12  
Date

Orange County Mayor  
Title

**OPTIONAL CERTIFICATION  
CDBG**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having a particular urgency as specified in 24 CFR 570.208(c):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having a particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

*Arif Dakhwanji*  
Signature/Authorized

*5.8.12*  
Date

*fu*  
Orange County Mayor  
Title

**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If the participating jurisdiction intends to provide tenant-based rental assistance:

The use of HOME funds for tenant-based rental assistance is an essential element of the participating jurisdiction's consolidated plan for expanding the supply, affordability, and availability of decent, safe, sanitary, and affordable housing.

**Eligible Activities and Costs** -- it is using and will use HOME funds for eligible activities and costs, as described in 24 CFR § 92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in § 92.214.

**Appropriate Financial Assistance** -- before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

*Arif Dalshada*  
Signature/Authorized

5.8.12  
Date

Orange County Mayor  
Title

## ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

**Major rehabilitation/conversion** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the jurisdiction will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the jurisdiction serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The jurisdiction will assist homeless individuals in obtaining permanent housing, appropriate supportive services ( including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for such individuals.

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

**Confidentiality** – The jurisdiction has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the jurisdiction will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

**Discharge Policy** – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

*[Handwritten Signature]*  
Signature/Authorized

5.8.12  
Date

Orange County Mayor  
Title



### HOPWA Certifications

The HOPWA grantee certifies that:

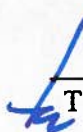
**Activities** -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

**Building** -- Any building or structure assisted under that program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

  
\_\_\_\_\_  
Signature/Authorized

5.8.12  
\_\_\_\_\_  
Date

  
\_\_\_\_\_  
Orange County Mayor  
Title

## APPENDIX TO CERTIFICATIONS

### INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

#### A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

#### B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

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Check  if there are workplaces on file that are not identified here.

This information with regard to the drug-free workplace is required by 24 CFR part 21.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including:

(i) All "direct charge" employees;

(ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and

(iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).



Substantial Amendment  
2011-2012 Annual Action Plan  
to include

# **EMERGENCY SOLUTIONS GRANT**

**Housing and Community Development Division**