CITY OF EL PASO, TEXAS
AGENDA ITEM DEPARTMENT HEAD'S SUMMARY FORM

DEPARTMENT: Community and Human Development

AGENDA DATE: April 17, 2012

CONTACT PERSON/PHONE: William Lilly/541-4643

DISTRICT(S) AFFECTED: All Districts

SUBJECT:

APPROVE a resolution / ordinance / lease to do what? OR AUTHORIZE the City Manager to do what? Be descriptive of what we want Council to approve. Include $ amount if applicable.

Discussion and action on a Resolution amending the 2010-2015 Consolidated Plan to add an Emergency Solutions Grant (ESG) component, and amending the City's 2011-2012 Annual Action Plan by adding ESG-funded activities as specified in Attachment A attached hereto, and approving the Proposed Budgets for those activities: (1) Homeless Prevention Activities – County of El Paso - $160,000; (2) HMIS Services – El Paso Coalition for the Homeless - $24,485; and (3) Administration Costs – City of El Paso - $25,000; authorizing the City Manager to sign and submit necessary forms and related certifications to HUD as part of the amended 2011-2012 Annual Action Plan; authorizing the City Manager to sign a Grant Agreement with HUD for the ESG grant funding; and authorizing the City Manager to take any actions necessary to accomplish the intent of this resolution and be authorized to sign any agreements or related documents for agency ESG activities upon approval by the City Attorney's Office and Director of Community and Human Development Department.

BACKGROUND / DISCUSSION:

Discussion of the what, why, where, when, and how to enable Council to have reasonably complete description of the contemplated action. This should include attachment of bid tabulation, or ordinance or resolution if appropriate. What are the benefits to the City of this action? What are the citizen concerns?

On December 5, 2011, the interim regulation for the Emergency Solutions Grant (ESG) program was published by the Department of Housing and Urban Development (HUD), along with corresponding amendments to the Consolidated Plan regulations. On January 4, 2012, the interim rule became effective. The Emergency Solutions Grant program replaced the Emergency Shelter Grant program, and expands the eligible activities to include homelessness prevention and rapid re-housing components. As part of the requirements of receiving this grant allocation from HUD, the City of El Paso was required to advertise this proposed amendment to allow for citizen comment in accordance with its own Citizen Participation Plan. ESG funds awarded to the City of El Paso must be spent within a two-year period.

The purpose of the ESG program is to assist individuals and families quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. ESG funds are available to be used for the following program components: (1) **Street Outreach**: Funds may cover costs related to essential services for unsheltered persons (including emergency health or mental health care, engagement, case management, and services for special populations; (2) **Emergency Shelter**: Funds may be used for renovation of emergency shelter facilities and the operation of those facilities, as well as for the residents; (3) **Homelessness Prevention and Rapid Re-Housing**: Both components fund housing relocation and stabilization services. Funds may also be used for short- or medium-term rental assistance for those who are at-risk of becoming homeless to transitioning to stable housing; (4) **Homeless Management Information System (HMIS)**: Funds may be used to pay the costs for contributing data to the HMIS designated by the Continuum of Care for the area; and (5) **Administration**: Recipients may use up to 7.5% of the entire grant allocation on activities related to the administration of the Emergency Solutions Grant.

The following activities are proposed to be undertaken by the identified organizations with ESG funding as a part of the City's 2011-2012 Annual Action Plan in the form of a substantial amendment as stipulated by HUD: Homelessness Prevention Services provided by the County of El Paso for $160,000; HMIS services provided by the El Paso Coalition for the Homeless for $24,485; and Administrative costs by the City's Department of Community

and Human Development for $25,000. All activities will receive ESG funding as a part of the City's 37th Year (2011-2012) Annual Action Plan in the form of a substantial amendment as stipulated by HUD and attached hereto as Attachment A and will serve the entire city. **(All Districts)**

A Notice was placed in the El Paso Times in English on March 7, 2012, and in the El Diario in Spanish on March 9, 2012, to allow a 30-day period for public comment ending April 9, 2012. Any citizen comments received after the submittal of this Agenda Item Department Head's Summary Form will be forwarded to City Council for consideration.

PRIOR COUNCIL ACTION:
Has the Council previously considered this item or a closely related one?

City Council has approved similar amendments to its previous Consolidated Plans, and many other amendments in prior years.

AMOUNT AND SOURCE OF FUNDING:
How will this item be funded? Has the item been budgeted? If so, identify funding source by account numbers and description of account. Does it require a budget transfer?

The City of El Paso is applying for ESG funds in the amount of $209,485 that will be available locally. ESG funds awarded to jurisdictions will need to be expended within two years. The City is submitting the formal substantial amendment (Attachment A) for ESG funding to HUD.

BOARD / COMMISSION ACTION:
Enter appropriate comments or N/A

The recommendation to amend the City of El Paso's 2010-2015 Consolidated Plan and 2011-2012 Annual Action Plan by adding an Emergency Solutions Grant component with recommended budgeted activities was presented to the Community Development Steering Committee on January 12, 2012. The Steering Committee unanimously accepted the recommendation.

********************REQUIRED AUTHORIZATION**********************

LEGAL: (if required) _____ **FINANCE:** (if required) _____

DEPARTMENT HEAD: Anthony C. Shack for W. Lilly

(Example: if RCA is initiated by Purchasing, client department should sign also)
Information copy to appropriate Deputy City Manager

APPROVED FOR AGENDA:

CITY MANAGER: _____ **DATE:** _____

RESOLUTION

WHEREAS, on June 22, 2010, the City Council for the City of El Paso adopted a five-year (2010-2015) Consolidated Plan that serves as a comprehensive housing affordability strategy, community development plan, and submission for funding programs that address homelessness and homelessness prevention such as the Emergency Shelter Program and Community Development Block Grant Public Services homeless programs which were submitted to the U.S. Department of Housing and Urban Development (HUD); and

WHEREAS, the City Council, based on the recommendation of the Director of the Community and Human Development Department and Department staff, now desires to amend the 2010-2015 Consolidated Plan by adding an Emergency Solutions Grant (ESG) Program component, to amend the 2011-2012 Annual Action Plan by adding ESG funded activities as specified in Attachment A, and to approve the Proposed Budgets for the ESG funded activities; and

WHEREAS, on March 7 and 9, 2012, the City of El Paso published in the El Paso Times and El Diario newspapers public notice to allow a 30-day public comment period regarding the proposed amendment to the 2010-2015 Consolidated Plan and the 2011-2012 Annual Action Plan and City Council has duly considered public comment, if any; and

NOW THEREFORE BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF EL PASO:

1. That the 2010-2015 Consolidated Plan is hereby amended as follows:

   Adding an Emergency Solutions Grant (ESG) component in the 2010-2015 Consolidated Plan, and amending its 2011-2012 Annual Action Plan to allow the City of El Paso to use funds specifically designated for ESG activities, as specified below and in Attachment A:

   Homelessness Prevention Activities – County of El Paso - $160,000;
   HMIS Services – El Paso Coalition for the Homeless - $24,485; and
   Administration Costs – City of El Paso - $25,000;

   to assist individuals and families to quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. **(All Districts)**.

2. That the City Manager be authorized to sign and submit to the U.S. Department of Housing and Urban Development (HUD) Form SF-424, a Substantial Amendment to the 2010-2015 Consolidated Plan for the ESG Program (Attachment A), as part of the amended 2011-2012 Annual Action Plan, and related certifications contained therein.

3. That the City Manager be authorized to sign a Grant Agreement with HUD for the ESG grant covered by the City's Annual Action Plan.

4. That the City Manager be authorized to take any actions necessary to accomplish the intent of this resolution and be authorized to sign any agreements or related documents for agency ESG activities upon approval by the City Attorney's Office and Director of Community and Human Development Department.

ADOPTED this _____ day of _____, 2012.

CITY OF EL PASO

_____
John F. Cook
Mayor

ATTEST:

_____
Richarda Duffy Momsen
City Clerk

APPROVED AS TO FORM:

_____
Marie A. Taylor
Assistant City Attorney

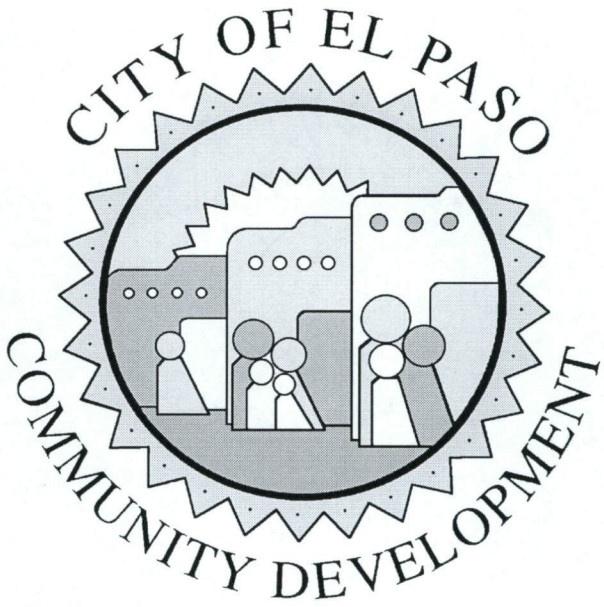
APPROVED AS TO CONTENT:

_____
FOR William L. Lilly, Director
Community and Human Development

ATTACHMENT A

CITY OF EL PASO, TEXAS
2010-2015 CONSOLIDATED PLAN AMENDMENT
And
2011-2012 ANNUAL ACTION PLAN AMENDMENT

Emergency Solutions Grant (ESG)



PREPARED BY THE
DEPARTMENT OF COMMUNITY AND HUMAN DEVELOPMENT
April 17, 2012

APPLICATION FOR FEDERAL ASSISTANCE

OMB Approved No. 3076-0006 | Version 7/03

2. DATE SUBMITTED	Applicant Identifier
April 26, 2012	

1. TYPE OF SUBMISSION:		3. DATE RECEIVED BY STATE	State Application Identifier
Application	Pre-application		
☐ Construction	☐ Construction	4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier
☑ Non-Construction	☐ Non-Construction		S-11-MC-48-0005

5. APPLICANT INFORMATION

Legal Name:	Organizational Unit:
City of El Paso, Texas	Department: Community and Human Development
Organizational DUNS: 058873019	Division:
Address:	**Name and telephone number of person to be contacted on matters involving this application (give area code)**
Street: 2 Civic Center Plaza	Prefix: / First Name: William
City: El Paso	Middle Name
County: El Paso	Last Name: Lilly
State: TX / Zip Code: 79901	Suffix:
Country: USA	Email: LillyWL@elpasotexas.gov
6. EMPLOYER IDENTIFICATION NUMBER *(EIN)*: 74-6000749	Phone Number (give area code): 915-541-4643 / Fax Number (give area code): 915-541-4370

8. TYPE OF APPLICATION:

☐ New ☐ Continuation ☑ Revision

If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) [A] [ ]

Other (specify)

7. TYPE OF APPLICANT: (See back of form for Application Types)

Municipal

Other (specify)

9. NAME OF FEDERAL AGENCY:
U.S. Department of Housing and Urban Development

10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:

14-231

TITLE (Name of Program):
Labor Management Cooperation Program

11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:

Emergency Solutions Grant Program - Provision of street outreach, emergency shelter, homelessness prevention and rapid re-housing, HMIS and administration costs to assist individuals and families in regaining stability in permanent housing after experiencing a housing crisis or homelessness.

12. AREAS AFFECTED BY PROJECT *(Cities, Counties, States, etc.)*:

City of El Paso, Texas

13. PROPOSED PROJECT		14. CONGRESSIONAL DISTRICTS OF:	
Start Date: 9/1/11	Ending Date: 8/31/13	a. Applicant 16	b. Project 16

15. ESTIMATED FUNDING:

		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?
a. Federal	$ 209,485.00	a. Yes. ☐ THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON DATE:
b. Applicant	$ .00	
c. State	$ .00	
d. Local	$ .00	b. No. ☑ PROGRAM IS NOT COVERED BY E. O. 12372
e. Other	$ 1,118,600.00	☐ OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW
f. Program Income	$ .00	**17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?**
g. TOTAL	$ 1,328,085.00	☐ Yes If "Yes" attach an explanation. ☑ No

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

a. Authorized Representative

Prefix	First Name: Joyce	Middle Name
Last Name: Wilson		Suffix
b. Title: City Manager		c. Telephone Number (give area code): 915-541-4844
d. Signature of Authorized Representative		e. Date Signed: April 17, 2012

Introduction

On December 5, 2011, the interim regulation for the Emergency Solutions Grant (ESG) program was published by the Department of Housing and Urban Development (HUD), along with corresponding amendments to the Consolidated Plan regulations. On January 4, 2012, the interim rule became effective. The Emergency Solutions Grant program replaces the Emergency Shelter Grant program, and expands the eligible activities to include homelessness prevention and rapid re-housing components. As part of the requirements of receiving this grant allocation from HUD, the City of El Paso advertised this proposed amendment to allow for citizen comment in accordance with its own Citizen Participation Plan. ESG funds awarded to the City of El Paso must be spent within a two-year period.

The purpose of the ESG program is to assist individuals and families quickly regain stability in permanent housing after experiencing a housing crisis or homelessness. ESG funds are available to be used for the following program components: (1) Street Outreach: Funds may cover costs related to essential services for unsheltered persons (including emergency health or mental health care, engagement, case management, and services for special populations; (2) Emergency Shelter: Funds may be used for renovation of emergency shelter facilities and the operation of those facilities, as well as for the residents; (3) Homelessness Prevention and Rapid Re-Housing: Both components fund housing relocation and stabilization services. Funds may also be used for short- or medium-term rental assistance for those who are at-risk of becoming homeless to transitioning to stable housing; (4) Homeless Management Information System (HMIS): Funds may be used to pay the costs for contributing data to the HMIS designated by the Continuum of Care for the area; and (5) Administration: Recipients may use up to 7.5% of the entire grant allocation on activities related to the administration of the Emergency Solutions Grant.

The following activities are proposed to be undertaken by the identified organizations with ESG funding as a part of the City's 2011-2012 Annual Action Plan in the form of a substantial amendment as stipulated by HUD: Homelessness Prevention Services provided by the County of El Paso for $160,000; HMIS services provided by the El Paso Coalition for the Homeless for $24,485; and Administrative costs by the City's Department of Community and Human Development for $25,000.

A draft of the proposed Amendment to the City of El Paso's 2010-2015 Consolidated Plan and 2011-2012 Annual Action Plan, including proposed processes and ESG activities, was made available to the public for review and comment at the Office of the City's Department of Community and Human Development, 8th Floor, #2 Civic Center Plaza (City Hall); at its website: http;//www.elpasotexas.gov/commdev/forms.asp.; at the main public library and all branch libraries; and the libraries of the El Paso Community College campuses and the University of Texas at El Paso. Comments from the public were invited and were to be submitted to the Department of Community and Human Development, 8th Floor, #2 Civic Center Plaza, El Paso, Texas 79901-1196, no later than 6:00 p.m. on Monday, April 9, 2012.

No written comments were received. During a regular meeting of the El Paso City Council on April 17, 2012, the public was provided the opportunity to comment on the Substantial Amendment to the 2010-2015 Consolidated Plan and the 2011-2012 Annual Action Plan. However, there were no comments by the public prior to approval of the resolution.

Citizen Participation

As is required by the U. S. Department of Housing and Urban Development, the City of El Paso's Citizen Participation Plan is in compliance with 24 CFR 91.105 Citizen participation plan; local governments. The Plan is available at the City's public libraries, college and university libraries, as well as on the City's website, <http://www.elpasotexas.gov/commdev/forms.asp>.

It's the City's continuing goal to make development of its Plans a transparent and inclusive process. The City of El Paso encourages participation of citizens, especially citizens residing in low- and moderate-income areas; neighborhood associations; persons with disabilities and persons in need of special accommodations; public, private and faith-based organizations, to include school districts and other agencies that provide assisted housing, health services, public services, and fair housing services (including those that focus on providing services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, homeless persons, including the chronically homeless); and other City Departments.

A summary of the Amendment to the City of El Paso's 2010-2015 Consolidated Plan and 2011-2012 Annual Action Plan was published in English and Spanish in the City's general circulation newspapers, the El Paso Times on Wednesday, March 7, 2012 and the El Diario on Friday, March 9, 2012. The Draft Amendment to the City of El Paso's 2010-2015 Consolidated Plan and 2011-2012 Annual Action Plan was made available for a 30-day public comment period beginning on Wednesday, March 7, 2012, at the City's Department of Community and Human Development, the City's Main Library and at all of the 12 branch libraries located throughout the City. The deadline for written comments on the Draft Amendment to the City of El Paso's 2010-2015 Consolidated Plan and 2011-2012 Annual Action Plan was April 9, 2012. Comments could also be made at the public hearing regarding the adoption of the ESG amendment to the 2010-2015 Consolidated Plan on April 17, 2012.

No written comments were received. During a regular meeting of the El Paso City Council on April 17, 2012, the public was provided the opportunity to comment on the Substantial Amendment to the FY 2011 Consolidated Plan Annual Action Plan. However, there were no comments by the public prior to approval of the resolution amending the 2010-2015 Consolidated Plan.

Summary of Consultation Process

The City of El Paso collaborated with representatives of the Continuum of Care in developing this Amendment, which included determining how to allocate ESG funds for eligible activities. The uses for ESG funding were developed from Continuum information based on the quantity and use of existing resources for homeless prevention activities, much of which was based on the lessons learned through the Homelessness Prevention and Rapid Re-Housing Program (HPRP). The Homeless Management Information System (HMIS) data on the number of households that became homeless in a year—primarily due to economic reasons and various other risk factors they faced—and HMIS data on the success of the program that helps homeless households link to mainstream resources were also considered. Additionally, a broad range of homeless providers and prevention providers were asked to provide suggestions and input on how best to utilize the second allocation of ESG funding to maximize the funding impact in our community. City staff further reviewed and made use of the recommendations in developing the proposed Amendment and procedures used in implementing the Plan. The Plan calls for making heavy use of homeless prevention funding to assist as many households to remain in their homes and achieve housing stabilization.

Participation in the El Paso HMIS is mandatory for agencies receiving funding from the U. S. Department of Housing and Urban Development (HUD). This includes Continuum of Care Grants, HOPWA and funds administered by the City of El Paso (ESG and CDBG grants). The El Paso Coalition for the Homeless is the administrator of El Paso's HMIS and launched the use of the system in 2004. The coalition maintains the pool of licenses needed to allow users to access the MetSYS system and works regularly with MetSYS staff to address training, technical questions, reports, and plans for upgrading or changing the system.

Coalition staff sets up and authorizes every program using HMIS within the CoC, and as per HUD regulations, every user with every program undergoes security and user training by Coalition staff. An HMIS Management Committee meets on a monthly basis to review policies and procedures, including an annual review of the El Paso's HMIS Participation Standards, to ensure compliance with HUD regulations and to verify that agencies are complying with standards as per City contract terms. In addition, monthly HMIS Steering Committee meetings are held, which both users and administrators attend, to ensure that HMIS operations are smooth, standardized, and complete.

The standards below assist in developing funding, policies, and procedures for the operation and administration of HMIS, and in turn, establish the minimum requirements that agencies must meet to be certified as participants in the El Paso HMIS. The El Paso Coalition for the Homeless will measure each agency's performance against this standard and report the results (Participating/Non-participating) to the Board of Directors of the El Paso Coalition for the Homeless (the Board) as required. As a minimum, participation will be evaluated prior to submission of the Continuum of Care grant request and prior to the City to El Paso's award of ESG and CDBG funding.

Evaluation will then be forwarded to the appropriate funding agency/governmental entity. Additional evaluations will be provided to the Board of Directors of the El Paso Coalition for the Homeless, the City of El Paso and agency Executive Directors on a monthly basis. The El Paso Continuum of Care, as administered by the El Paso Coalition for the Homeless (EPCH), is responsible for the operation of the El Paso HMIS. As such, the Board of Directors of the EPCH shall be the final authority for certifying the participation status for all agencies. Any agency appealing the Board's determination will submit a written request for review within 5 days of notification of Non-participation.

Standards: Participation Agreements - Agencies must maintain an active HMIS Agency Agreement on file at the HMIS Office. Agencies must also be timely in providing Letters of Intent and Memorandums of Understanding (MOU's) for participation in the El Paso HMIS, as required by HUD and the City of El Paso.

Financial: All agencies must pay their HMIS grant match 90 days from the date of the invoice. Agencies will be considered non-participating until such funds are received.

Attendance at HMIS Steering Committee Meetings: The HMIS Steering Committee is vital to maintaining effective communication between the HMIS Staff and the agencies. Each agency must have a representative attend at least 75% of all regular and special meetings of the HMIS Steering Committee held within the previous 12 months. It's the responsibility of each agency to appoint at least one representative to the committee, to monitor their attendance, and to be sure that this standard is met.

Data Timeliness: All data must be complete and available for HMIS processing within 5 working days after the end of each month. Exceptions may be granted by the HMIS Project Coordinator only if the exceptions do not limit the effectiveness of the HMIS System.

Data Completeness: The El Paso HMIS Community Standard established for adults and children is the minimum data set required for participation. This data set may be used for Emergency Shelters and other programs which are not required to file an Annual Progress Report (APR). Agencies required by HUD to file an APR must also include the additional data required by HUD (Program-Specific Data Elements, HMIS Data Standards Revised Notice, March 2010). Sample Intake and Exit Forms incorporating both the El Paso HMIS Community Standard and the required APR data are available from HMIS. HMIS will assist agencies in collecting and processing the additional information required for preparing their APR.

Data Accuracy: All data entered into the HMIS must be reviewed by the agency for accuracy. HMIS data must be reconciled to other agency information, such as daily 'head counts'. All reconciliations must be complete by the end of the 5th working day after the end of each month. Agency Executive Directors will be responsible for their agency meeting these standards for data timeliness, completeness and accuracy.

Effective date for meeting Participation Standards:
Programs that supply housing to homeless individuals and families are expected to be in compliance by a date to be set by the Board. Programs that supply services to homeless must be in compliance by a date to be set by the Board. Implementation of HMIS for service agencies takes time. In order to meet the deadlines, agencies must begin working toward compliance immediately.

Exceptions by type of agency: HUD has concerns over HMIS implementation in agencies that primarily provide assistance to victims of domestic violence (DV). HUD is also concerned over participation by other agencies that have legal or ethical restrictions on data collection and sharing. Until HUD produces definitive guidance for HMIS participation, the HMIS Project Coordinator will provide recommendations to the Board for determining participation status for these unique agencies.

New Agencies: New agencies will be allowed three full calendar months to meet participation standards. Prior to the end of the three month deadline, agencies will consider participating if they have executed all necessary participation agreements, met the finance requirements, have at least two employees that are qualified and trained for data entry and have had representation at every regular HMIS Steering Committee Meeting held during the period.

Grace Period for meeting Participation Standards: In the event that an agency fails to meet these minimum standards for participation in the HMIS System, the Board, either on appeal by an agency or at the recommendation of the HMIS Project Coordinator, may choose to grant a grace period to bring the agency into compliance. The grace period is at the discretion of the Board and shall not exceed three full calendar months.

It's important for the City to obtain reliable data on the ESG program. To accomplish the collecting and reporting of ESG-specific data in HMIS, the Coalition will:

1. Set up Rapid Rehousing and Homelessness Prevention programs in HMIS.
2. Acquire from MetSYS additional licenses as needed to support the program-specific data elements.
3. Customize data screens as necessary to capture HMIS data particular to each program.
4. Design any applications, forms or guides to be used that will streamline HMIS data entry.
5. Examine and certify any computers to be used for HMIS purposes, as required by HUD.
6. Train those persons designated as authorized HMIS users under each program. (Many users will already be trained on the MetSYS system but may need to be trained on entering data specific to ESG – Rapid Rehousing and Homelessness Prevention. Other users may be new to HMIS and MetSYS and will need both security and user training.)

7. Once users are entering ESG data, Coalition staff will be available as "help desk" support when users encounter technical difficulties, are not sure how to capture certain data, or want to make more complete use of HMIS as a tool for learning more about their clients or improving management and performance of their programs.
8. Monthly, Coalition staff will generate reconciliation reports to assist agencies in monitoring HMIS data to ensure it is accurate and complete, including crosschecking the number of clients entering and exiting programs (assistance). These reports will assist programs in confirming data accuracy and will keep program administrators apprised of how they are performing compared to budgets and projections.
9. Coalition staff will assist agencies in the preparation of reports required by their specific grant on a monthly, quarterly or annual basis as needed.
10. Coalition staff will work with the HMIS Management Committee and the City to update as needed El Paso's HMIS Participation Standards, so that the Coalition can represent that agencies are participating in HMIS as required.
11. Coalition staff will host monthly HMIS Steering Committee to share information, provide updates to users and discuss and resolve any HMIS issues encountered.
12. Coalition staff will create and analyze monthly CoC-wide reports for measuring and monitoring overall CoC performance.
13. Coalition staff will provide additional evaluation support and analysis as requested by the City in compliance with the new HEARTH regulations.

Coalition staff does not engage in outreach or recruitment efforts and there are no restrictions as to the number of users. Per the interim HEARTH regulations, projects receiving funding under the ESG program must participate in an HMIS, making HMIS one of the five eligible program components under ESG; street outreach, emergency shelter, homelessness prevention, rapid re-housing assistance, and HMIS.

Discussion of Funding Priorities

The City of El Paso utilized the first allocation of ESG funds to fund projects of similar nature that have been funded under the Emergency Shelter Grant Program, as detailed in the Declaration of FY2010 Grant Funded Commitments table on page 7. The second allocation of ESG funds were used to fund housing projects and HMIS, as indicated in the 2nd Allocation FY 2011-2012 table on page 8. The table lists the names, addresses, and performance standards for the applicants for the second allocation of ESG funding.

Through the experience in administering the HPRP, the great need for housing in El Paso was demonstrated. For the HPRP programs, an average of 10 housing applicants remained on the waiting list of the programs each month that the programs remained in operation. The City of El Paso advertised a Request for Proposals (RFP) for local agencies who desired to become the City's subrecipients for administering a Homelessness Prevention and a Rapid Re-Housing program. The County of El Paso

submitted an application for the Homelessness Prevention program, but no agency application was received for the Rapid Re-Housing Program. Housing being a priority for the City, $160,000 or 76% of the ESG second allocation was provided for the Homelessness Prevention program. A total of $24,485 or 12% of the ESG second allocation was set aide for HMIS to be assigned to the El Paso Coalition for the Homeless, the City's HMIS administrator. Both Homelessness Prevention and HMIS support the national priorities established in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness.* The proposed activities and overall budget are detailed below in Table 3C Consolidated Plan Listing of Project on pages 9 and 10.

Detailed Budget

The table below lists the Declaration of FY2010 Grant Funded Commitments.

CITY OF EL PASO Declaration of FY 2010 Grant Fund Commitments	
Activity Type	**Obligated Amount**
Homeless Assistance	$354,690.00
Homelessness Prevention	$ -
Administrative Activities	$18,468.00
Total FY 2010 Award	**$373,158.00**

The table on page 11 outlines the FY2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations.

2nd ALLOCATION FY 2011-2012
EMERGENCY SOLUTIONS GRANT (ESG) PROGRAM

	APPLICANT/ ADDRESS	PROJECT NAME and PERFORMANCE OUTCOME STATEMENT	CURRENT FUNDING	REQD FUNDING	SHELTER OUTREACH	EMERGENCY SHELTER	HOMELESSNESS PREVENTION	HMIS	PROPOSED BUDGET
1	County of El Paso 500 E. San Antonio, Suite #301 El Paso, Texas 79901 CONTACT: Michael Flores, Program Director	El Paso County's ESG #2 Program – The County of El Paso's General Assistance office will provide financial assistance and rental/utility payments to at least, 160 households in the City of El Paso currently renting and at risk of becoming homeless. Through the availability of rental assistance 75% of clients will remain housed in their current homes. The County will measure success by whether a household is still at the same address 6 months after the end of the assistance; and/or the household does not seek assistance from another homeless program one year after the end of the assistance. The County will track this by sending letters 6 months following the end of the assistance; and follow up via HMIS data on clients one year following the end of assistance. $715,000 in additional funds will be used to support this program.	$ -0-	$160,000	$-0-	$-0-	$160,000	$-0-	$160,000
2	El Paso Coalition for the Homeless 6044 Gateway East, Suite #211 El Paso, Texas 79905 CONTACT: Carol Bohle, Executive Director	HMIS Services – ESG – Through the availability and accessibility of HMIS at least 13 agencies receiving ESG funding will be entering client level data into HMIS regularly and accurately after receiving specific training for their particular program. On a monthly basis, reconciliation reports will be generated by HMIS staff and delivered to each ESG recipient to ensure that all data entered is accurate and complete, no missing values, "don't know" responses, etc. Using this HMIS data as a basis, required City reports will be generated monthly, quarterly and/or annually as required by the ESG grant terms. $24,485 in additional funds will be used to support this program.	$-0-	$24,485	$-0-	$-0-	$-0-	$-0-	$25,000
3	Dept. of Community and Human Development # Civic Center Plaza, 8th Floor El Paso, Texas 79901-1196	ESG City Administrative Fees – Grantee may use not more than 7.5% of the grant amount for its own administrative costs. Portion (35%) of one Grant Planner's salary.	$18,468	$25,000	N/A	N/A	N/A	N/A	$25,000
		2011-2012 TOTAL ESG BUDGET	**$18,468**	**$209,485**	**$-0-**	**$-0-**	**$160,000**	**$24,485**	**$209,485**

U.S. Department of Housing and Urban Development

OMB Approval No. 2506-0117 Exp. 8/31/2014)

Table 3C
Consolidated Plan Listing of Projects

Jurisdiction's Name: City of El Paso

Priority Need

Project Title
County of El Paso – El Paso County ESG #2 Program

Description
The County will be providing financial assistance and services inside the city limits for individuals and families who are currently in housing but are at risk of becoming homeless. These clients need assistance and stabilization services to prevent them from becoming homeless and establish permanent housing stability.

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

Location/Target Area
El Paso, Texas/City wide

Street Address: 500 E. San Antonio, Suite 301
City, State, Zip code: El Paso, Texas 79901

Objective Number DH-2	Project ID
HUD Matrix Code	ESG Citation 24 CFR Part 576
Type of Recipient	ESG National Objective
Start Date (mm/dd/yyyy) 09/01/2011	Completion Date (mm/dd/yyyy) 08/31/2013
Performance Indicator	Annual Units 160
Local ID	Units Upon Completion 160

Funding Sources:	
CDBG	
ESG	$160,000
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	$965,000
Total	$1,125,000

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

U.S. Department of Housing and Urban Development

OMB Approval No. 2506-0117 Exp. 8/31/2014)

Table 3C
Consolidated Plan Listing of Projects

Jurisdiction's Name: City of El Paso

Priority Need

Project Title
El Paso Coalition for the Homeless – HMIS Services

Description

The El Paso Coalition for the Homeless is the Administrator of the local Homeless Management Information System, a HUD-required integrated internet-based database which records and stores client-level information on the characteristics and service needs of homeless person. This system is utilized by homeless assistance providers to create a more coordinated and effective housing and service delivery system. The HMIS SERVICES – ESG project will increase staff capacity in order to provide the necessary training, help desk support, technical assistance and reconciliation reports to ensure accurate, complete compliance reporting as required by the new HEARTH regulations.

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

Location/Target Area
El Paso, Texas/City wide

Street Address: 6044 Gateway East Suite #211
City, State, Zip code: El Paso, Texas 79905

Objective Number DH-2	Project ID
HUD Matrix Code	ESG Citation 24 CFR Part 580
Type of Recipient	ESG National Objective
Start Date (mm/dd/yyyy) 09/01/2011	Completion Date (mm/dd/yyyy) 08/31/2013
Performance Indicator	Annual Units 13
Local ID	Units Upon Completion 13

Funding Sources:	
CDBG	
ESG	$24,485
HOME	
HOPWA	
Total Formula	
Prior Year Funds	
Assisted Housing	
PHA	
Other Funding	$153,600
Total	$178,085

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

5.c - CITY OF EL PASO
FY 2011 Detailed Budget Table

First Allocation	$372,417.00
Second Allocation	$209,485.00
Grant Amount	$581,902.00
Total Administration	$43,642.65

FY 2011
Emergency Shelter Grants/Emergency Solutions Grants Program Allocations

		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	**Activity Amount**	**Reprogrammed Amount**	**Activity Amount**	**Activity Amount**
Emergency Shelter Grants Program	Homeless Assistance	**$0.00**	**$0.00**		**$0.00**
	Rehab/Conversion	$0.00			$0.00
	Operations	$230,472.00			$230,472.00
	Essential Services	$111,725.00			$111,725.00
	Homelessness Prevention	**$11,600.00**			**$11,600.00**
	Administration	**$18,620.00**			**$18,620.00**
	Emergency Shelter Grants Subtotal	**$372,417.00**	**$0.00**		**$372,417.00**
Emergency Solutions Grants Program	Emergency Shelter**			**$0.00**	**$0.00**
	*Renovation***			$0.00	$0.00
	*Operation***			$0.00	$0.00
	*Essential Service***			$0.00	$0.00
	*URA Assistance***			$0.00	$0.00
	Street Outreach - Essential Services**			**$0.00**	**$0.00**
	HMIS			**$24,485.00**	**$24,485.00**
	Rapid Re-housing		**$0.00**	**$0.00**	**$0.00**
	Housing Relocation and Stabilization Services				$0.00
	Tenant-Based Rental Assistance				$0.00
	Project-Based Rental Assistance				$0.00
	Homelessness Prevention		**$0.00**	**$160,000.00**	**$160,000.00**
	Housing Relocation and Stabilization Services				$0
	Tenant-Based Rental Assistance				$0
	Project-Based Rental Assistance				$0.00
	Administration			**$25,000.00**	**$25,000.00**
	Emergency Solutions Grants Subtotal		**$0.00**	**$209,485.00**	**$209,485.00**
			Total Grant Amount:		**$581,902.00**

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

Match

The City of El Paso is aware that the ESG grant requires a match of 100% amount or greater of cash or non-cash resources. The table below identifies the type of match proposed for the second allocation of ESG funding.

Agency	Type of cash and/or non-cash match	Specific amount of resources for match	Proposed use of match resources
County of El Paso	Employee salaries – 11 County employee's salaries @ average of $28,383 Emergency Assistance Support Assistance	$312,213 $442,575	Services Performed by Caseworkers, Community Service Aides, Office Specialists, GA/VA Specialist, Accounting Clerk
El Paso Coalition for the Homeless	Continuum of Care Renewal HUD – HMIS Grant	$102,764	HMIS software, Hosting/Licensing, Internet Access, Personnel, Equipment, Operations
TOTAL		**$857,552**	

Written Standards for Provision of ESG Assistance

Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.

Program staff considers the following income when determining eligibility and need:

1. Earned Income
2. Self Employment/Business Income
3. Interest and Dividend Income
4. Pension and Retirement Income
5. Unemployment Compensation

The household must be at risk of losing housing. This means the household would become literally homeless or require emergency shelter but for this assistance. The caseworker must also determine the following:

1. No other appropriate housing is available;
2. No financial resources exist that would allow the household to remain in the home or to obtain immediate housing; and
3. No other resources or support networks are available.

Client and/or other household member(s) must be U.S. citizens, Legal Permanent Residents, or Qualified Aliens. Program staff verifies legal residency or Qualified Alien status by reviewing immigration documents. Eligible household members must reside within the El Paso City Limits.

Program staff requests various documents to verify the identity of the applicant to limit fraudulent applicants. The applicant or any individual applying on behalf of the head of household must provide a picture identification to confirm the identity of the head of household and/or applicant. In emergency cases, an affidavit of identity by applicant or other household members can suffice until applicant obtains alternative identity documents. Acceptable documents for identification include:

1. Picture ID such as driver's license, government ID card, any other official document, a combination of documents, or other means of identification;
2. Proof of date of birth (Birth Certificate, Passport, or other legal documentation.); and
3. Social Security Card.

Income is a gain or benefit received on regular or predictable basis that provides the household with its normal living expenses.

1. Disability Income (Including RSDI and SSI);
2. Workman's Compensation;
3. Veteran's Compensation and/or pension;

4. TANF or OTT ANF /Public Assistance;
5. Alimony, Child Support and Foster Care Income;
6. Armed Forces Income; and
7. Regular monthly contributions or allowances intended to assist the household in meeting its normal living expenses, whatever the source.

Program staff does not consider the following income when determining need:

1. Earned Income from Children under 18 years of age;
2. Inheritance and Insurance Income;
3. Medical Expense Reimbursements;
4. Income of Live-in Aid;
5. Income for Disabled Persons living In HOME-assisted housing or receiving HOME tenant-based rental assistance;
6. Student Financial Aid;
7. Armed Forces Hostile Fire Pay;
8. Self-Sufficiency Program Income;
9. Other Income (i.e. temporary, non-recurring or sporadic income, including gifts) (NOTE: This applies to annualized income but still count for when figuring income in the last 30 days);
10. Reparations;
11. Income from full-time students over age 18 who are dependents;
12. Adoption Assistance Payments;
13. Deferred and Lump Sum Social Security and SSI Payments;
14. Income Tax and Property Tax Refunds;
15. Home Care Assistance;
16. Other Federal Exclusions;
17. Retirement account;
18. In-kind contributions, which includes such items as food, clothing, and furniture; and
19. A one-time vendor payment - payments made directly by one party to another party on behalf of the household such as payment of the household rent or mortgage directly to the landlord or mortgagee.

Verifying Income - Program staff must verify gross income for the 30-day period before the application date and must annualize that income according to HUD regulations. Income recently terminated should not be included in the annualized income. Income for the household must be at or below 30% of Area Median Income (AMI) (http://www.huduser.org/portal/datasets/il/ill_0/index.html). Staff may use any of the following:

1. Paycheck stubs;
2. A statement from an employer on company letterhead indicating income received or other pertinent information, including dates of termination, dates work began and /or dates of first paycheck;

3. Written documentation from agencies that provide the income, such as an award letter from the Social Security Administration or from the Department of Veterans Affairs, or if applicable written documentation of benefit termination;
4. Verification by other public assistance agencies such as the Texas Department of Human Services which verifies all income before awarding food stamps or TANF grants;
5. If self-employed, gross receipts of income within the last 30 days; and
6. In cases where one or more adult(s) in the household is/are unemployed, each unemployed adult must fill out, sign, and date a Self-Declaration of Income Statement.

Annualizing Income - To calculate income, add the gross amount earned per pay period and divide by the number of pay periods. This is the average income per period. To annualize, use the applicable calculations as follows:

1. Hourly wage multiplied by Hours Worked per Week multiplied by 52 weeks
2. Weekly Wage multiplied by 52 weeks
3. Bi-weekly Wage (every other week) multiplied by 26 bi-weekly pay periods
4. Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly pay periods
5. Monthly Wage multiplied by 12 months

Assets - Staff considers the following resources when determining eligibility and need:

1. Cash on hand or cash grants received from other sources
2. Certificates of deposit
3. Treasury notes
4. Savings bonds
5. Savings and checking accounts
6. Stocks
7. Oil, gas or mineral rights
8. Land/building (other than the household's homestead)
9. Vehicles used for recreational purposes only
10. Properties with cash value which the household could divest in order to meet its financial needs
11. Business assets with cash value which the household could divest in order to meet its financial needs

Program staff does not consider the following resources when determining need:

1. The applicant's homestead;
2. Household goods such as furniture or appliances;
3. Personal belongings such as clothing or jewelry;
4. Cash or loan value of life insurance policy up to $1,000.00 or less PER PERSON;

5. Savings or checking account not to exceed $500.00 for one person or $700.00 for two or more;
6. Retirement account; and
7. Vehicles if used as the household's normal means of transportation; or as the household's home.

Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid-re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

The City of El Paso, as Grantee for the ESG Grant, will utilize the services of the El Paso Coalition for the Homeless to coordinate the services of the ESG program and the services of other service providers serving the homeless. The Coalition for the Homeless is a non-profit agency that coordinates the Continuum of Care (CoC) process for the County of El Paso and is also the HMIS administrator for the CoC, ESG, Community Development (CD), Supporting Housing Program (SHP) and other programs. The City of El Paso provides financial support to the Coalition on a regular basis. Through individual agency contacts and at meetings of the Coalition for the Homeless General Assembly and CoC meetings, the City and its ESG subcontractors coordinate the services of ESG and other homeless service providers. Some of the service providers include El Paso Opportunity Center for the Homeless, Rescue Mission of El Paso, Salvation Army, Center Against Family Violence, El Paso Center for Children, El Paso Child Crisis Center, YWCA Transitional Living Center, La Posada Transitional Living Center, La Posada Home, El Paso Villa Maria, TVP Non-Profit Corporation and Housing Authority of the City of El Paso.

Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.

The Homelessness Prevention program will focus on individuals and families living in a residence that are at risk of losing their residence due to economic reasons. The criteria to be used for selecting the Homelessness Prevention clients are the following:

(1) An individual or family who:
  (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
  (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or some other similar type place.
  (iii) Meets one of the following conditions:
    (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
    (B) Is living in the home of another because of economic hardship;

(C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;

(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution).

Having administered the HPRP, the City of El Paso has found that the need for the Rapid Re-Housing program in the community is great. For this reason, the City advertised a Request for Proposals (RFP) to seek local agencies willing to serve as subrecipients to administer not only the Homelessness Prevention program, but also the Rapid Re-Housing program. Applications were received for the Homelessness Prevention program, but none for the Rapid Re-Housing program. Most agencies felt insecure in applying for the Rapid Re-Housing Program and the agency that administered the program under HPRP chose not to apply for the program under ESG. This being the case, the City of El Paso will not be administering the Rapid Re-Housing program for the present funding allocation period, but intends to seek an agency or agencies for the Rapid Re-Housing program for future ESG allocation periods.

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.

RENT

1. Program staff authorizes payment of full amount of rent and late fees as determined by the lease. Assistance must not exceed this cost, which must be in compliance with HUD's Rent Reasonableness standards.
2. Rent may be paid at an assisted living facility, boarding house, or group home as long as each resident has an individual lease.
3. Rent may be paid for either a mobile home or lot (or both if charged as a single payment).
4. Households receiving a subsidy or other assistance for the same cost type (rent) during the same time period are not eligible for ESG assistance.
5. Partial payments for rent are allowed only if it is determined that the tenant paid the other portion and did not receive assistance from any other entity for the same period.

6. Application fees, administrative fees, court costs and costs due to damages are not an allowable expense.
7. Payments to Hotels or Motels are not allowable under Homelessness Prevention Program.

UTILITIES

1. ESG pays utilities, defined as electricity, water, and gas, directly to the provider on behalf of a client.
2. Deposits, late fees and reconnect fees are eligible expenses.
3. Bills from previous addresses are eligible expenses as long as they do not exceed 3 months of arrears under the City ESG grant.
4. For each month being paid, a utility bill, in the name of the Applicant/Head of Household, must be provided.

Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.

Homelessness Prevention clients are evaluated every three months in regards to their income eligibility. Qualified clients are renewed three months at a time up to a maximum of 18 months. At each quarterly review, rent and utility assistance will be reduced in accordance with the economic improvement made by the clients. For whatever reason a client drops out of the program, for a certain period of time and later decides to re-enter the program the 18 month maximum would still apply.

Process for Making Sub-awards

The City of El Paso made sub-awards for the ESG funds through a Request for Proposals (RFP) from local agencies advertised in the local newspaper. A deadline was given for submission of applications to the city. Applications received were then reviewed by City staff to check for program eligibility. The applications were then submitted to the Community Development Steering Committee, a lay person advisory group to City Council, for review and recommendation to City Council. City Council made the final decision on the applications.

Homeless Participation Requirement

The City of El Paso is governed by an elected City Council. The County of El Paso, the subrecipient for the Homelessness Prevention program, is governed by an elected County Commissioners Court. Therefore, an ESG advisory committee will be organized under the auspices of the El Paso Coalition for the Homeless to advise the City and ESG subrecipients on the overall performance of the ESG program. Persons who are homeless and/or former homeless as well persons from the community-at-large will be recruited to serve on the advisory committee.

Performance Standards

Homelessness Prevention

Ends	Measurement	Annual Metrics
Efficient number of households served	Households served (#)	Set based on program capacity, prior year(s) attainment and funds available.
	New households served (#)	Set based on program capacity, prior year(s) attainment and funds available.
Access to resources and services to maintain and stabilize housing	Successful housing outcomes (%)	At least 90% will maintain or obtain housing.
	Successful housing outcomes (#)	Calculated based on the Successful housing outcomes % measurement.
	Housing Affordability at Exit (%)	At least 50% of successful households have their housing affordability ratio, measured as cost of housing (rent and utilities) divided by the household's income at exit, lower than 50%. Monitored but not evaluated during FY2012/13.
	If applicable, usage of other community resources (%)	% of households that receive other community resources will be consistent with prior performance.
Not enter the emergency shelter system	Recidivism (%)	≤5% of those who have successful housing outcomes will enter shelter.
Efficient and effective use of a pool of community resources	Cost per household	Cost per household will be consistent with budget.
	Cost per successful housing outcome	Cost per successful housing outcome will be consistent with budget.
	Pass program certification	Provide access to and coordination with community resources and services to prevent homelessness.
	Average length of participation	Based on program design.

Use of At Risk of Homelessness Definition

The County of El Paso, the subrecipient for the Homelessness Prevention program will utilize the "at risk of homelessness" factors in screening clients for the program. The at-risk of homelessness is defined as an individual or family who:

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

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

Food and Nutrition Act of 2008 (7 U.S.C.2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance.

Centralized or Coordinated Assessment System

The County of El Paso has been operating the General Assistance (GA) Office for almost forty years and is well known as a program that helps households in need of basic emergency assistance. The county has established processes for assessing the type and level of assistance the client needs, documented in a 20-page Program Guidelines Manual for General Assistance that will be supplemented with procedures for ESG clients. As a recipient of the HPRP (Homeless Prevention and Rapid Re-Housing) funds, the County is well aware of the activities related to the homeless prevention component and activities related to the ESG funding and have established procedures for assessing the type and level of assistance the client needs. The County will use the following basic intake and assessment process:

1. The head of household completes a written application for ESG assistance and submits it to the GA office.
2. GA staff reviews the application to ensure it is materially complete and the household appears, from the initial screening, to be eligible for assistance.
3. Staff schedules the individual or head of household for a face-to-face interview with a case worker, with interviews occurring within five business days for applicants who are at immediate risk of losing their housing.
4. During the eligibility interview, staff obtains further information to assess the risk of homelessness and the type and extent of assistance required.
5. If an applicant is found to be ineligible for ESG assistance, but eligible for County assistance, the caseworker will process the request for County Assistance.
6. Once a household is determined eligible for ESG assistance, the case worker will complete any forms required and enroll the client into the program, open a case file for the household, authorize a schedule of benefits based on need, assemble all supporting documentation, and submit a voucher for assistance.
7. Office staff will enter data into the Homeless Management Information System (HMIS) to track the number of months and amount of financial assistance provided to each client or household. No client or household may receive more than 12 months of financial assistance, including months paid in arrears.
8. GA ensures that authorized property owners received payment. GA staff will also track the number of months, amount of financial assistance provided to each client and periodically check these records against GA's internal database for possible duplication of assistance.

9. Staff maintains the confidentially of all information collected during the interview. The County auditor issues checks directly to the property owner. Staff makes no payments to the client or any relative of the client. Staff works to provide payment within two weeks of the ESG enrollment.
10. Based on the caseworker's assessment, staff may pay a maximum of three (3) month's rent to support family self-sufficiency efforts.

Generally, the primary factors and criteria used by the General Assistance staff will be determined by whether the household would be homeless "but for" the ESG assistance. Assistance is as follows (at least two factors are required):

- Homelessness in the last 12 months;
- Eviction within 2 weeks from a private dwelling;
- Sudden and significant loss of income;
- Sudden and significant increase in utility costs;
- Severe housing cost burden (greater than 50% of income going toward housing costs);
- Significant amount of medical debt; mental health and substance abuse issues;
- Physical disabilities and other chronic health issues, including HIV/AIDS;
- Extremely low income (less than 30% of AMI)
- Past institutional care (prison, treatment facility, hospital);
- Recent traumatic life event or recent health crisis that prevented the household form meeting its financial responsibilities
- Young head of household (under 25 years with children or pregnant);
- Pending foreclosure of rental housing.

At the County General assistance office, households assessed and determined to need short-term financial assistance (up to 3 months following enrollment) will generally be provided with case management, primarily during the initial interview and assessment session. Households assessed to need medium-term financial assistance (4 to 12 months) will be assessed further by the case manager to further provide any ongoing case management needed to promote permanent housing stability.

The amount and extent of financial assistance provided will depend on the case worker's assessment of what the client reasonably needs to avoid homelessness and return to housing stability a quickly as possible. The County will have discretion to pay all or only part of the rent.

After the first 6 months of operating the ESG program, the County will review the expenditure rate and the number of households served to determine whether additional limits should be set.

Monitoring

The Department of Housing and Urban Development (HUD) requires direct monitoring of sub-recipient agencies on an annual basis. Monitoring is not a one-time event, but rather an on-going process of planning, implementation, communication and follow-up. The monitoring objective is to ensure that sub-recipients comply in all-important areas of program administration and regulatory compliance.

Programmatic monitoring goals are to make sure sub-recipients comply with all regulations governing administrative and programmatic operations. They also are to make sure sub-recipients achieve performance objectives.

Programmatic Monitoring Process

There are seven steps in the monitoring process.

1. ***Notification Letter***: The Community Development monitor will contact the agency to arrange for monitoring. Each agency will be monitored a minimum of once annually. Written notification will be mailed and faxed at least one week prior to the scheduled monitoring with a listing of the records that will be reviewed. The agency will contact the monitor, as stated in the notification letter, to confirm appointment. The records that were requested in the letter, along with a suitable working area, should be ready at the time the monitor arrives at the agency.

2. ***Tour of Facilities:*** Upon arrival at the facility, the monitor will request a short tour of the facilities to become familiarized with the program. The agency should give a summary of the services that are provided.

3. ***Entrance Conference:*** The monitor will meet with the appropriate staff to review the monitoring process, explain which records will be audited, and discuss any pending issues, such as late billings and lack of proof of insurance. The monitor will also request information on the preparation of units of service reports and direct service providers.

    a. ***Documentation and Data Acquisition:*** The monitor will request records selected for monitoring and discuss record keeping methods with staff who maintain them. Certain documents and records may be copied for purposes of preparing the report.

5. ***Analysis:*** Sub-recipients are required to submit reports on a periodic basis as described in each contract.

6. ***Exit Conference:*** The monitor will meet with appropriate staff and/or agency director to present the **tentative conclusions** from the monitoring. The exit conference has four objectives:
    - to present preliminary results of the monitoring visit;

- to provide an opportunity for the agency to correct any misconceptions or misunderstandings on the monitor's part;
- to secure additional information from agency staff to clarify or support their position;
- for any deficiency that surfaces, the monitor will suggest corrective action. A deadline and a follow-up visit may be scheduled to verify corrective action has been taken by the agency.

7. ***Monitoring Report:*** Within 30 days after the completion of the exit conference or desk-top review, a written report of the results of the monitoring visit will be forwarded to the sub-recipient.

- If the programmatic monitoring results in no findings or concerns, a letter will be sent commending the agency and no further action is needed on behalf of the agency;
- If there are any findings, they will be listed and fully identified, along, with corrective actions that are recommended. A written response from the agency is required, otherwise, future payments will be held;
- If there are any concerns, they will be listed and fully identified, along with corrective actions that are recommended;
- Observations will be made regarding the agency's operation, facility, and interaction with clients.

If a response is needed for the monitoring report, the agency is given 30 days after receipt of the monitoring report. The agency must submit a written response to the monitoring report. The response should list each individual finding and a satisfactory response should be listed for each. Copies of any documentation to back up the response to the findings need to be included.

Community Development will then review the agency's response letter. Upon receipt of the agency's written response to the monitoring report, the monitor will review the letter and determine if the agency's reply to the finding/concern proved satisfactory.

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 person (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.

THE CITY OF EL PASO

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Joyce A. Wilson, City Manager

April 17, 2012
Date

APPROVED AS TO FORM:

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Marie Taylor
Assistant City Attorney

APPROVED AS TO CONTENT:

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William Lilly, Director
Community Human and Development