

City of Peoria 2014 Annual Action Plan



Expected Resources

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

Introduction

The City of Peoria expects to receive Community Development Block Grant, HOME Investment Partnership funds and Emergency Solutions Grant funds, available from HUD, during the five year period of this Consolidated Plan. The use of CDBG funds will include a Clearance activity.

Anticipated Resources

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,581,903	0	0	1,581,903	6,327,612	See leverage information in the narrative below

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Reminder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	503,138	0	0	503,138	2,012,552	See leverage information in the narrative below
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	130,786	0	0	130,786	523,144	See leverage information in the narrative below

Table 1 - Expected Resources – Priority Table

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

The federal funds identified above will leverage additional private, state and local funds. This may include private funds for the installation of emergency furnaces provided by the local utility provider, Ameren Illinois Utilities. Ameren funds are not being provided in association with any

City of Peoria federal funds.

CDBG funds may be used to leverage State of Illinois lead based paint grants that may be received by the Peoria City/County Health Department. These will be used to address residential lead paint hazards in homes occupied by lower income households. CDBG funds for economic development will also be used to leverage private investment.

The City of Peoria allocates over \$200,000 in corporate funds annually for supportive neighborhood development activities, including newsletter grants, crime prevention, public safety initiatives, and capacity building of grass roots organizations. These funds are not being provided in connection with any federal grants. The combined investment of corporate, state and federal funds into Peoria's neighborhoods yields holistic and sustainable results.

Match Requirements:

The Community Development Block Grant program has no match requirement.

The City of Peoria is required to provide a 12.5% match for every HOME dollar invested. This match is achieved through private donations, volunteer hours, and/or corporate dollars from HOME funded organizations. Match may also be achieved from prior year match balances.

The Emergency Solutions Grant (ESG) requires a 100% match. This match is achieved through the use of non-federal funds obtained by ESG subrecipients who are awarded the ESG funds. Match funds from previous years have included funds from the State of Illinois Department of Commerce and Economic Opportunity (DCEO), the City of Peoria, the Illinois Department of Human Services (IDHS), the Federal Emergency Management Agency (FEMA), the Illinois State Board of Education (ISBE) and the local United Way.

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

There is no publically owned land or property within Peoria that is planned to be used to address the needs in the Consolidated Plan.

Discussion

The CDBG activity will include a Clearance activity. This is not noted on the CDBG Use of Funds section on the table above.

Annual Goals and Objectives

AP-20 Annual Goals and Objectives

Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Focus Area Housing Program Leverage	2014	2018	Affordable Housing	CDBG Target Area	Affordable Housing - New construction Affordable housing - Rehab of existing units	HOME: \$165,138	Homeowner Housing Added: 1 Household Housing Unit Homeowner Housing Rehabilitated: 1 Household Housing Unit
2	Economic Development Programs	2014	2018	Non-Housing Community Development	CDBG Target Area	Economic Development	CDBG: \$163,860	Jobs created/retained: 4 Jobs
3	PCCDH Lead Match Program	2014	2018	Affordable Housing	CDBG Target Area	Affordable housing - Rehab of existing units	CDBG: \$50,000	Rental units rehabilitated: 2 Household Housing Unit Homeowner Housing Rehabilitated: 3 Household Housing Unit
4	Roof Housing Rehabilitation Program	2014	2018	Affordable Housing	CDBG Target Area	Affordable housing - Rehab of existing units	CDBG: \$230,000	Homeowner Housing Rehabilitated: 15 Household Housing Unit
5	Demolition Program	2014	2018	Non-Housing Community Development	CDBG Target Area	Clearance	CDBG: \$300,000	Buildings Demolished: 36 Buildings

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
7	CHDO Set Aside	2014	2018	Affordable Housing	CDBG Target Area	Affordable Housing - New construction	HOME: \$300,000	Homeowner Housing Added: 3 Household Housing Unit
8	Public Service Set Aside	2014	2018	Non-Housing Community Development	CDBG Target Area	Public Services	CDBG: \$237,285	Public service activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted
9	Emergency Solutions Grant	2014	2018	Homeless	CDBG Target Area	Homeless- Emergency Shelter Homelessness - Rapid Re-housing	ESG: \$121,786	Tenant-based rental assistance / Rapid Rehousing: 5 Households Assisted Homeless Person Overnight Shelter: 200 Persons Assisted Overnight/Emergency Shelter/Transitional Housing Beds added: 10 Beds
10	Planning / General Administration	2014	2018	Planning / General Administration	CDBG Target Area	Affordable Housing - New construction Affordable housing - Rehab of existing units Homeless- Emergency Shelter Homelessness - Rapid Re-housing Public Services Economic Development Clearance	CDBG: \$300,386 HOME: \$38,000 ESG: \$9,000	Other: 1 Other

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
11	Housing Rehabilitation Delivery	2014	2018	Affordable Housing	CDBG Target Area	Affordable Housing - New construction Affordable housing - Rehab of existing units	CDBG: \$100,372	Homeowner Housing Rehabilitated: 1 Household Housing Unit
13	ADA Ramp Program	2014	2018	Non-Housing Community Development	CDBG Target Area	Public Improvements and Infrastructure	CDBG: \$200,000	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 2000 Persons Assisted

Table 2 – Goals Summary

Goal Descriptions

1	Goal Name	Focus Area Housing Program Leverage
	Goal Description	This goal will focus on housing in specific eligible area(s). Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
2	Goal Name	Economic Development Programs
	Goal Description	This goal is designed to cause the creation of new jobs or retain jobs that otherwise would be lost. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
3	Goal Name	PCCDH Lead Match Program
	Goal Description	This goal will provide matching funds for the Peoria City/County Health Department's (PCCHD) Lead Hazard Control Match and support for the Clear Win lead abatement activity serving low income owners and renters. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
4	Goal Name	Roof Housing Rehabilitation Program
	Goal Description	This goal is to install new roofing and associated materials on eligible owner occupied single family homes. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.

5	Goal Name	Demolition Program
	Goal Description	This goal is to clear deteriorated structures on a spot basis or slum and blight area. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
7	Goal Name	CHDO Set Aside
	Goal Description	This goal is to create new housing units for low income eligible households using no less than 15% of HOME Investment Partnership funds. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
8	Goal Name	Public Service Set Aside
	Goal Description	This goal is to provide a variety of public services to be utilized by low income residents. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
9	Goal Name	Emergency Solutions Grant
	Goal Description	This goal will provide rapid re-housing, emergency housing, case management, and HMIS for eligible homeless and near homeless persons. Continuum members will be encouraged to expand outreach with faith-based organizations and the possibility of having a formal needs survey available at these organizations' events, such as soup kitchens, food pantries and clothing donations.
10	Goal Name	Planning / General Administration
	Goal Description	This goal is to make sure all grants and their associated activities are properly planned and administered. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
11	Goal Name	Housing Rehabilitation Delivery
	Goal Description	This goal is designed to make sure housing rehabilitation activities are properly inspected and administered.
13	Goal Name	ADA Ramp Program
	Goal Description	This activity will install ADA ramps at intersections and other pedestrian crossing areas. Please note that the activity is city-wide, but may include the geographic area noted below.

Projects

AP-35 Projects – 91.220(d)

Introduction

The projects listed below will address the high priority needs contained in this plan in 2014.

Projects

#	Project Name
1	Focus Area Housing Program Leverage
2	Economic Development Programs
3	PCCHD Lead Match Program
4	Roof Housing Rehabilitation Program
5	Demolition Program
7	CHDO Set Aside
8	Public Service Set Aside
9	Emergency Solutions Grant
10	Planning / General Administration
11	Housing Rehabilitation Delivery
13	ADA Ramp Project

Table 3 – Project Information

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

The reason for these allocation priorities is that they address the high priority identified needs contained in the plan. Funding priorities have not changed from those outlined in the Strategic Plan. There are no known obstacles in addressing underserved needs or proposed actions.

AP-38 Project Summary

Project Summary Information

1	Project Name	Focus Area Housing Program Leverage
	Target Area	CDBG Target Area
	Goals Supported	Focus Area Housing Program Leverage
	Needs Addressed	Affordable Housing - New construction Affordable housing - Rehab of existing units
	Funding	HOME: \$165,138
	Description	This goal will focus on housing in specific eligible area(s). Please note that the Goal Outcome Indicator Quantity is 1 Home Owner Housing Added and 1 Home Owner Housing Rehabilitated. No rental housing work is expected in 2014.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Two low income families.
	Location Description	City-Wide
	Planned Activities	This activity will focus on affordable housing, which may include both rental and homeowner, in specific area(s).
2	Project Name	Economic Development Programs
	Target Area	CDBG Target Area
	Goals Supported	Economic Development Programs
	Needs Addressed	Economic Development
	Funding	CDBG: \$163,860
	Description	This project is designed to cause the creation of new jobs or retain jobs that otherwise would be lost. Please note that the activity is city-wide, but will primarily serve the geographic areas noted below.
	Target Date	12/31/2014

	Estimate the number and type of families that will benefit from the proposed activities	Four low income families.
	Location Description	City-wide
	Planned Activities	Creation of new jobs with current employers or with new companies or retained jobs in existing businesses.
3	Project Name	PCCHD Lead Match Program
	Target Area	CDBG Target Area
	Goals Supported	PCCDH Lead Match Program
	Needs Addressed	Affordable housing - Rehab of existing units
	Funding	CDBG: \$50,000
	Description	This activity will provide match funds for the Peoria City/County Health Department's (PCCHD) Lead Hazard Control Match and supports the Clear Win lead abatement activity serving low income owners and renters.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	Five low income families
	Location Description	City-wide
	Planned Activities	This activity will conduct lead paint inspection, mitigation and clearance activities as well as process applications.
4	Project Name	Roof Housing Rehabilitation Program
	Target Area	CDBG Target Area
	Goals Supported	Roof Housing Rehabilitation Program
	Needs Addressed	Affordable housing - Rehab of existing units
	Funding	CDBG: \$230,000
	Description	This activity is to install new roofing and associated materials on eligible owner occupied single family homes. This activity is city-wide but many of the sites will be in the target areas.
	Target Date	12/31/2014

	Estimate the number and type of families that will benefit from the proposed activities	Fifteen low income families
	Location Description	City-wide
	Planned Activities	Planned activities are to receive and approve applications and replace roofing shingles and related materials for a complete new roof.
5	Project Name	Demolition Program
	Target Area	CDBG Target Area
	Goals Supported	Demolition Program
	Needs Addressed	Clearance
	Funding	CDBG: \$300,000
	Description	This activity is to clear deteriorated structures on a spot basis.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 36 vacant homes will be demolished. No families will benefit. Benefit accrues to buildings.
	Location Description	City-wide.
	Planned Activities	The planned activity is to remove deteriorated blighting structures.
6	Project Name	CHDO Set Aside
	Target Area	CDBG Target Area
	Goals Supported	CHDO Set Aside
	Needs Addressed	Affordable Housing - New construction
	Funding	HOME: \$300,000
	Description	This activity is to create new housing units for low income eligible households using no less than 15% of HOME Investment Partnership funds.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Three low income families.

	Location Description	City-wide
	Planned Activities	The activities will include all elements for the construction of new single family homes.
7	Project Name	Public Service Set Aside
	Target Area	CDBG Target Area
	Goals Supported	Public Service Set Aside
	Needs Addressed	Public Services
	Funding	CDBG: \$237,285
	Description	This activity is to provide a variety of public services to be utilized by low income residents. This activity is city-wide but many of the sites will be in the target areas.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Approximately 2000 low income residents.
	Location Description	City-wide
	Planned Activities	Planned activities include services to benefit youth, child care, mental health, senior and abused and neglected children.
	8	Project Name
Target Area		CDBG Target Area
Goals Supported		Emergency Solutions Grant
Needs Addressed		Homeless-Emergency Shelter Homelessness - Rapid Re-housing
Funding		ESG: \$130,786
Description		This goal will provide rapid re-housing, emergency housing, and case management services for eligible homeless persons. The budget includes \$9,000 for administration and planning. City administration and HMIS costs will be paid.
Target Date		12/31/2014
Estimate the number and type of families that will benefit from the proposed activities		Approximately 215 homeless persons

	Location Description	City-wide
	Planned Activities	These activities are rapid re-housing, overnight shelter and overnight emergency shelter transitional housing beds.
9	Project Name	Planning / General Administration
	Target Area	CDBG Target Area
	Goals Supported	Planning / General Administration
	Needs Addressed	Affordable Housing - New construction Affordable housing - Rehab of existing units Public Services Economic Development Clearance
	Funding	CDBG: \$300,386 HOME: \$38,000
	Description	This goal is to make sure CDBG and HOME grants and their associated activities are properly planned and administered. This activity is city-wide but many of the sites will be in the target areas.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	Planning and administration activities are not subject to benefit numbers.
	Location Description	City-wide
	Planned Activities	The planned activities are for administering the CDBG, and HOME grants and associated activities and coordination with related programs.
10	Project Name	Housing Rehabilitation Delivery
	Target Area	CDBG Target Area
	Goals Supported	Roof Housing Rehabilitation Program CHDO Set Aside Housing Rehabilitation Delivery

	Needs Addressed	Affordable Housing - New construction Affordable housing - Rehab of existing units
	Funding	CDBG: \$100,372
	Description	This activity provides housing inspections and other housing services for both CDBG and HOME housing projects. This activity is city-wide but many of the sites will be in the target areas.
	Target Date	
	Estimate the number and type of families that will benefit from the proposed activities	This activity provides housing inspections and other housing services for housing rehabilitation activities. All activities are for households at 80% AMI or lower.
	Location Description	City-wide
	Planned Activities	Inspection and other services for CDBG and HOME housing activities.
11	Project Name	ADA Ramp Project
	Target Area	CDBG Target Area
	Goals Supported	ADA Ramp Program
	Needs Addressed	Public Improvements and Infrastructure
	Funding	CDBG: \$200,000
	Description	This activity will install ADA ramps at intersections and other pedestrian crossing areas. Please note that the activity is city-wide, but will include the geographic areas noted below.
	Target Date	12/31/2014
	Estimate the number and type of families that will benefit from the proposed activities	An estimated 2000 people will benefit with handicap accessible pedestrian facilities.
	Location Description	City-wide
	Planned Activities	This activity will install ADA ramps at intersections and other areas to improve and provide safe pedestrian movement, especially for those physically impaired.

AP-50 Geographic Distribution – 91.220(f)

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

The CDBG Target Area geographic area is in census tracts where at least 51% of the households have less than 80% AMI and, for minority concentration, where at least 40% of the residents are of a minority race. This area is in the older sections of the City of Peoria, generally south of Gift Avenue.

Geographic Distribution

Target Area	Percentage of Funds
CDBG Target Area	70

Table 4 - Geographic Distribution

Rationale for the priorities for allocating investments geographically

Please see Section SP-10 Geographic Priorities in the Strategic Plan. The rationale has not changed.

Discussion

The rationale for geographic targeting is to use entitlement funds in an area where there is the most need and the most eligible residents in need, thereby having a concentrated impact.

Affordable Housing

AP-55 Affordable Housing – 91.220(g)

Introduction

The plan for affordable housing is to concentrate programs in 2014 on new construction and housing rehabilitation for eligible lower income households. No rental payment assistance or acquisition will be funded through grants covered in this plan in 2014.

One Year Goals for the Number of Households to be Supported	
Homeless	22
Non-Homeless	33
Special-Needs	12
Total	67

Table 5 - One Year Goals for Affordable Housing by Support Requirement

One Year Goals for the Number of Households Supported Through	
Rental Assistance	0
The Production of New Units	4
Rehab of Existing Units	21
Acquisition of Existing Units	0
Total	25

Table 6 - One Year Goals for Affordable Housing by Support Type

Discussion

The non-homeless units identified above include the following: Focus Area New Construction - Owner 1, Focus Area Rehabilitation - Owner 1, PCCHD Lead Match - Owner Rehabilitation 3, PCCDH Lead Match Program - Rental Rehabilitation 2, Roof Rehabilitation Program 15; and CHDO New Construction 3.

AP-60 Public Housing – 91.220(h)

Introduction

There are no projects from grants covered in this plan assigned to be used solely to meet the needs of public housing residents. The City of Peoria is working with the PHA on their redevelopment plans for Taft Homes and supports the PHA's Five Year Plan.

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

The City of Peoria plans to continue assisting the PHA in developing redevelopment plans for the Taft Homes site and other projects. The City of Peoria has no funded projects that will specifically address the needs of public housing residents. Some public service activities are utilized by PHA residents.

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

The PHA is increasing resident council involvement through meetings and input taken by the Senior Service Coordinator. Additional councils are being sought at Harrison and Taft Homes. The Family Self-Sufficiency Program provides additional opportunities for resident to express their needs. PHA staff and residents attended a "Neighborworks Community Leadership" program two years ago in order to prepare community action plans that can be implemented by the community. The PHA continues to identify potential homeownership residents through the Family Self-Sufficiency Program.

The PHA is offering a home ownership program with METEC Inc, a housing counseling agency. It also supports MONEY SMART WEEK, a one week financial information fair that includes homebuyer workshops on all aspects of the home buying process.

Newsletters are disseminated on a monthly basis to inform residents of the new opportunities and services available to keep residents involved in maintaining their neighborhood.

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

The PHA is designated as a troubled PHA and is working under a HUD recovery action plan. This is the process in removing the PHA's troubled designation. The City of Peoria is not actively providing assistance to help the PHA clear its "troubled" designation.

Discussion

No additional narrative is needed.

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

Introduction

The City objectives are to fund a Rapid Re-housing program with its ESG allocation, continue the partnership with the HOIHCOC to implement the HEARTH requirements and encourage the advance of HMIS as data collection tool for service delivery and funding prioritization.

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

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

The City will continue to participate in the local Continuum of Care Point-in-Time Count and Street Sweep. The City will require a formerly homeless or currently homeless individual to participate on the Human Resources Commission and HOIHCOC in the allocation of ESG funding to best assess the funded activities and the needed services. The City will distribute Continuum member agencies program locations, provider capacity and general referral information to its staff (including Police, Fire and 9-1-1 Center), local officials and neighborhood associations.

The City will encourage Continuum members to expand outreach with faith-based organizations and the possibility of having a formal needs survey available at these organizations' events, such as soup kitchens, food pantries and clothing donations.

Addressing the emergency shelter and transitional housing needs of homeless persons

The City plans to continue ESG funding for shelter operations for emergency shelters. In addition, within the first year, the City will work to decrease the number of people who enter and stay in emergency shelters through the newly developed Rapid Re-housing program.

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

The City will implement a Rapid Re-housing program funded with its ESG allocation. This program will be designed to assist currently homeless individuals and families move from emergency shelter to permanent housing.

The City will also collaborate with developers interested in the creation of new permanent supportive

housing or affordable housing units. City HOME funds may be allocated to this development.

In addition, the City will explore opportunities to link private landlords with social service agencies for the availability of housing. Further, the City will continue its proactive code enforcement to ensure housing units are well maintained, safe and secure and not have any deficiencies that would endanger tenants.

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

The City will collaborate with the local Continuum of Care to redesign the homeless prevention services and allocate only dollars, such as State or private, to fund homeless prevention assistance. The City and the HOIHCOC are in agreement that Federal resources should be prioritize to assist those currently homeless.

Additionally, the City will continue to assist the local Continuum of Care in the design of the coordinated/centralized assessment system to ensure those individuals with the greatest need are identified and appropriate referrals are made to available services immediately.

Discussion

There is no additional information to be provided.

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

Introduction:

Taxes, land use control and building codes can have a negative effect on affordable housing and residential investment. Peoria has no taxing policies that would negatively impact the development of affordable housing or residential investment. Housing taxes are based solely on the assessed value of the property. Land use controls include zoning, subdivision and building codes. The Land Development Code requires residential design elements that can increase development costs. This Code covers a majority of the CDBG Target Area. Building Code requirements and fees are uniform to all types of residential development and present no barriers to affordable housing or residential development. Affordable housing developments frequently obtain subsidies from the City and environmental clearance assistance when federal funds are involved. There are no fees, charges, growth limits, or other policies that affect the return on residential investment. Land costs are reasonable. Peoria has no impact fees.

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

The barriers to affordable housing introduction section above identifies one issue that can negatively effect affordable housing in the City of Peoria as being increased design and construction costs caused by the Land Development Code. The City will monitor affordable housing projects as they come to the City and may provide financial and/or other support for appropriate projects. Known projects planned for 2014 include Habitat for Humanity new housing, supported with HOME CHDO funds, and various Focus Area Housing Program Leverage activities financed with HOME funds.

Discussion:

No additional narrative is needed.

AP-85 Other Actions – 91.220(k)

Introduction:

The City of Peoria's planned actions in this section are to promote the coordination of services among providers, seek and support the pursuit of additional funding to address underserved needs, reduce the number of households in poverty through various services, and continue the mitigation of lead based paint hazard in homes occupied by low income households by providing matching funds to the Peoria City/County Health Department programs.

Actions planned to address obstacles to meeting underserved needs

Obstacles include insufficient funding, available properties for new construction, and a need for the coordination of services. To resolve these issues, the City of Peoria will apply for funding and support other applications that will finance programs that address underserved needs and encourage full participation and the coordination of services of all agencies in the Heart of Illinois Homeless Continuum of Care. The City of Peoria's CDBG public service application ranking system will provide additional points for applications showing coordination with others providing services.

Actions planned to foster and maintain affordable housing

There are no identified affordable housing units that may be lost from the assisted housing inventory in 2014. If such units are later identified, the City will provide support in efforts to keep or replace these housing units.

Actions planned to reduce lead-based paint hazards

The City of Peoria has budgeted \$50,000 in CDBG funds for 2014 to provide matching funds for the City/County Health Department's Lead Hazard Control and Clear Win grants from the State of Illinois. These programs address lead hazards in homes occupied by low income households. Please see the strategy outlined on SP-65 in the Strategic Plan.

Actions planned to reduce the number of poverty-level families

The City of Peoria will use a multi-faceted approach toward reducing the number of poverty level families in 2014. CDBG funds are being targeted for housing rehabilitation and public services, and Emergency Shelter Grant funds will be used for homeless rapid re housing and other services to bring families out of homelessness. These funds will assist low income families find suitable housing or remain in their homes without using their limited funds for repairs, and provide public services and other programs that directly assist families move out of poverty. See SP-70 in the strategic Plan.

Actions planned to develop institutional structure

The actions planned to address gaps and weaknesses in the institutional structure will be accomplished in 2014 through twice a year meetings among affordable housing providers, enhanced participation of homeless and mental health providers in the Heart of Illinois Homeless Continuum of Care, the City's continuing collaboration with the Tri-County Regional Planning Commission's programs for revitalizing the region, and through meetings with private business developers to discuss potential programs and projects. Please see SP-40 in the Strategic Plan for more information.

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

Actions that will take place in 2014 to enhance coordination between housing and social service providers will include encouraging collaboration in the coordination of services for homeless and near homeless persons through the Heart of Illinois Continuum of Care, and providing additional ranking points for CDBG public service applications reviewed by the Human Resources Commission that show the coordination of services with other agencies. Housing services in the East Bluff neighborhood are planned to be coordinated in 2014 with Peoria LISC, the City of Peoria, Peoria Opportunities, East Bluff Neighborhood Housing Services, Illinois Facilities Fund and the real estate community. The PHA's housing plans will be coordinated with the City of Peoria's plans and codes.

Discussion:

No additional narrative is needed.

Program Specific Requirements

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

Introduction:

The CDBG over all three year benefit period is 2014, 2015, and 2016. This Action Plan covers the first year of this three year period. The CDBG program has no program income available for 2014 and expects to use 70% of its CDBG grant funds for L/M activities. The HOME program will use a resale provision further described below.

The City of Peoria is hereby declaring that it may utilize CDBG entitlement funds for urgent needs activities if an eligible emergency occurs and the City Council approves such use of CDBG funds.

Community Development Block Grant Program (CDBG)

Reference 24 CFR 91.220(I)(1)

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

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	70.00%

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

1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:

There are no other forms of investment being used. HOME Investment Partnership funds will be used as a grant to its CHDO and a forgivable loan or grant to its Focused Area Housing Program recipients.

2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:

The HOME homebuyer activities funded with 2014 HOME funds are CHDO new construction and associated down payment assistance. The following recapture guidelines are used for these homebuyer activities.

Recapture Provision

When assistance is provided directly to a Homebuyer, Recapture Provisions will be enforced by the City. The City will reduce the HOME investment amount to be recaptured on a prorata basis for the time the Homeowner has owned and occupied the housing measured against the remaining years in the required Affordability Period.

However, the assisted Homebuyer will agree within the HOME Affordability Period, to not vacate and then lease the Residence. In the event that the Owner should vacate and then lease the Residence within the HOME Affordability Period, the Owner agrees, upon written demand from the City sent to the Owner's last known address, to re-occupy the Residence within a reasonable time as determined by the City and remain in the Residence until the expiration of the HOME Affordability Period. If re-occupancy, does not occur the Owner agrees to repay the total amount of the investment as outline above to the City. The repayment shall become due and payable upon the City's demand. The Period of Affordability shall mean fifteen (15) years from the date the Project is identified as "completed" in HUD's Integrated Disbursement Information System.

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

The City of Peoria has adopted a Resale Recapture Policy based on the guidance found at 24 CFR 92.254. The City has decided to use the Resale approach. The resale guidelines are an attachment to the Emergency Solutions Grant section below. See item 5.

4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is

rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:

There are no plans to use HOME funds to refinance any existing debt.

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

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

In conjunction with the City and the HOIHCOC, the development of ESG written standards were created to provide an agreed upon procedural guideline for program implementation in the City and through the HOIHCOC member agencies. The written standards should not be seen as an alternative to or replacement of HUD rules and guidance. The standards provide a framework through which ESG funds will be used in the City.

Specifically, ESG providers agree to follow procedures for screening, assessment, application and service provision to make certain that households meet the eligibility criteria of the program, to eliminate duplication, and to ensure seamless homeless prevention coverage. All ESG providers must enter client and service level data into the HOIHCOC HMIS system in accordance with HUD rules, operating standards set by the HOIHCOC and confidentiality laws.

Accompanied with the City's Annual Action Plan, ESG written standards for providing ESG assistance will be submitted to HUD.

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

Currently the HOIHCOC is in the development of the centralized or coordinated assessment system. The HOIHCOC has assigned a specific task group to plan, organize and determine that appropriate assessment tool and functionally of such a system in the HOIHCOC service area. Once a system is in place, the City will require all funded and future funded agencies to follow and participate in the created system.

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

Historically, ESG funds are released to the community through an application process by the Human Resources Commission (HRC). Community organizations submit applications to the HRC, the Commission reviews and rank the activities and makes final recommendations to City Council. Upon Council approval, the City executes subrecipient agreements with each organization. This application process is completed annually by Staff and the HRC.

ESG regulations require the City to collaborate with the HOIHCOC to conduct needs assessment, develop policies and procedures for service delivery and discuss funding allocation in order to provide the most comprehensive system for the homeless and at-risk population. Recently, the HRC has identified that the City's ESG program is closely linked to the HOIHCOC. Therefore, the HRC has requested that future ESG application and funding allocations be made by the HOIHCOC instead of the HRC. This recommendation has been approved by the Peoria City Council.

The HOIHCOC will submit a collaborative application to the City. The HOIHCOC will work with its member agencies to identify service priorities, provider capabilities to comply with ESG regulations, funding allocations for grant awards and make final recommendations. This process will be very team orientated and required communication between service providers on how to best allocate funds for the most needed services. This application process will begin with the 2014 funding year.

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

The City of Peoria Human Resources Commission and HOIHCOC meet the homeless participation requirements in 24 CFR 576.405 (a).

5. Describe performance standards for evaluating ESG.

Each ESG subrecipient identifies the performance standards to be used in its ESG funded activities. These performance standards are included as a part of the funding application and stated in the City's subrecipient agreements.

City staff reviews each application for funding to determine if the performance standards submitted are reasonable with the amount of funds being requested and is a standard that can be objectively measured.

ESG subrecipients submit request for reimbursements and performance reports to the City on a quarterly basis. Staff ensures that the funds being requested correspond to the performance standards accomplishments for the quarter. City Staff on-site monitoring is also completed for each ESG funded activities.

ESG Policies and Procedures are attached below.



Emergency Solutions Grant (ESG)
Policies and Procedures

The intent of this document is to provide a framework through which ESG funds will be used in the City of Peoria. This document provides a summary of HUD ESG rules and agreed upon procedural guidelines for program implementation in the City and provided by member agencies of the Heart of Illinois Homeless Continuum of Care (HOIHCO).

This document, in no manner, should be seen as an alternative to or replacement of HUD rules and guidance. More information can be found at www.hudhre.info

I. CONSISTENT PROCEDURES AND PRACTICES:

ESG providers agree to follow procedures for screening, assessment, application and service provision to make certain that households meet the eligibility criteria of the program, to eliminate duplication, and to ensure seamless homeless prevention coverage in the county. All ESG providers must enter client and service level data into the Heart of Illinois Homeless Continuum of Care (HOIHCO) HMIS system in accordance with HUD rules, operating standards set by the HOIHCO and confidentiality laws.

The ESG Interim Rule provided four possible categories under which individuals and families may qualify as homeless, corresponding to the broad categories established by the statutory language of the definition in section 103 of the McKinney-Vento Act, as amended by the HEARTH Act.

Projects must serve clients that qualify as Homeless (HUD definition at 24 CFR Part 91 or At-Risk of Homelessness (HUD definition at 24 CFR Part 576). The categories are:

- (1) Literally Homeless;
- (2) Imminent Risk of Homelessness;
- (3) Homeless under other Federal statutes; and
- (4) Individuals and families who are fleeing, or are attempting to flee domestic violence.

II. COORDINATION OF SERVICES:

ESG Providers will work with member agencies of the HOIHCO to utilize a universal brief screening tool to be used to identify consumers who are appropriate to access funds and supportive services through ESG.

Other available resources will be used before ESG funds are used in homeless prevention. In addition, the ESG providers will collaborate with other agencies to ensure that all households at risk will have full access to homeless prevention and intervention resources, including area shelters, transitional housing programs, townships and other human service entities.

Eligible applicants must live within the City of Peoria, meet income guidelines, and be homeless but for the ESG assistance.

III. PREVENTION OF HOMELESSNESS THROUGH THE ESG PROGRAM:

Prevention assistance to households under the ESG Program is intended to have a meaningful impact on homelessness and housing stability for participating households.

ESG provides a variety of supports (*See Eligible Supports*) to achieve the following three assistive elements: preventing people from homelessness; diverting people who are applying for shelter into other housing; and helping people who become homeless to quickly return to permanent housing. ESG consists of a Rapid Re-housing component for those who are currently homeless and a Homeless Prevention component for those at risk of becoming homeless. Eligible households include people with very low incomes (below 30% of the Area Median Income AMI), who lack resources for housing and who are homeless or would be homeless *but for this assistance*.

Participating households must agree to allow household demographic and service information to be shared through the HOIHCOC Homeless Management Information System (HMIS), (*See Confidentiality & HMIS Standards*), must complete a case management assessment and must develop and participate in case management and life skills support from a provider agency.

The HOIHCOC will target households that have a demonstrated housing crisis, that meet one or more risk factor and that are likely to remain stably housed after this assistance.

Eligibility may be re-assessed every 30 days for all participating households (*See Eligibility Criteria & Risk Factors*). Households receiving any type of rent assistance under this program must reside or plan to reside in an eligible unit (*See Eligible Units*). ESG is not a mortgage assistance program and it is not intended to serve persons who need long-term and or intensive supports.

Maximum forward assistance under this program is 3 months and may be extended with approval of the supervisor.

IV. ELIGIBLE SUPPORT FOR HOMELESS PREVENTION & RAPID RE-HOUSING

Supports provided by provider agencies are intentionally focused on housing – either financial assistance to help pay for housing, or services designed to keep people in housing or to find housing. ESG provider agencies should be prepared to develop a clear process for determining the type, duration and level of assistance available for each participating household.

Financial Assistance

- Rent arrearage (up to 6 months)**
- Short-term rent assistance (up to 3 months)**
- Security Deposits (max 2 months rent)
- Utility Deposits
- Utility Arrearages (up to 6 months)

Housing Relocation and Stabilization Services

- Case Management
- Housing Search and Placement

* The HOIHCOC ESG providers have agreed to limit short-term rent assistance to a maximum of 3 months.

V. PROCEDURAL GUIDELINES FOR ESG ASSISTANCE

- The HOIHCOC ESG provider agencies will only provide assistance to households residing in, homeless within or moving to Peoria, Tazewell, Woodford, and Fulton Counties.
- ESG assistance cannot be provided to eligible individuals or families for the same period of time and for the same cost types that are being provided through another federal, state, or local housing subsidy program.
- There are four cost types: rent payments (client portion or the subsidy), security deposits, utility deposits, and utility payments. So, if a participant is receiving rental assistance under another program, ESG funds may not be used for rental assistance during that same time period.
- Funding could be used to pay for another cost type such as security deposit or utility payments. For example, a homeless veteran entering a HUD-VASH project may receive security deposit assistance through ESG funds.
- For households who have the Section 8 Housing Choice Voucher, assistance should be provided through existing HPP funds such as IDHS before utilizing ESG funds, document rent amount and that the unit has passed inspection before any assistance is approved.
- When providing rental assistance and security deposit, the lease must be in the client's name and signed by the tenant and the landlord. The assistance (voucher and payment) is made to the property owner/property complex only, and is not to exceed the amount owed to the owner for rent and/or security deposit.
- Security Deposits are to be used for permanent housing only. Clients that are moving into a halfway house or need "program fees" are not eligible.
- ESG agencies will only provide the equivalent of 2 months' rent maximum for security deposit to eligible households. Exceptions will only be made for good cause, such as proven bad credit, which prevents the household and the ESG agency from locating an appropriate alternative unit.
- When providing rental arrearage assistance the ESG agency must ensure and document that the payment will enable the eligible household to remain in the housing unit for which the arrears are being paid or enable the household to move to another unit.

- ESG agencies will only provide eligible individuals or households with up to 6 months of arrears, provided that the client or a member of his/her household has an account in his/her name with a utility company. ESG funds can only be utilized for provision of gas, electric, water, and sewer services, not phone or cable.
- Financial assistance is provided in voucher form only and no payments are made directly to participating households.
- ESG providers must track ESG services separately from other funds. Likewise, services provided under the components of Homeless Prevention and Rapid Re-housing must be tracked independent of each other. Finally, ESG funds provided via the State of Illinois must be tracked separately from ESG funds provided by the City of Peoria.

VI. ELIGIBILITY CRITERIA

All households must be reassessed for eligibility on a quarterly basis. Households which do not meet all eligibility criteria are not eligible to receive any ESG services - including financial assistance and housing relocation and stabilization services. Households may become ineligible for ESG services if they do not meet the terms of the Recovery Plan at any point as determined by the ESG provider. (*See Separation Guidelines*)

HUD Guidelines:

- Household must be at or below 30% of the HUD Area Median Income (AMI) guidelines (*see www.huduser.org/DATASETS/il.html*);
- Must have no subsequent housing options identified but for this assistance;
- Must lack financial resources or support network to obtain and sustain housing but for this assistance;
- Agrees to allow household information to be shared via the HMIS reporting system, ESG funding recipients must be entered into HMIS for reporting requirements (unless exempted by law);
- Must complete a comprehensive assessment of needs matrix, a goal sheet, and the universal service plan for housing stabilization;
- ESG funding recipients must be willing to create and engage in services, goal-setting, and case management as needed to acquire and maintain stable housing (independent of this assistance within a defined time period not to exceed 12 months);
- If receiving assistance with utility deposit or utility arrearage, household must show valid disconnect notice or proof that utilities will not be connected without assistance. As with all activities under ESG, assistance must be sought first from other resources (LIHEAP);
- If receiving short term rent assistance, the household must be living in or planning to move to a residence which meets HUD's Rent Reasonableness Standard and quality housing standards. (*See Eligible Units*);

- If receiving any services through the Rapid Re-housing component of ESG, household must be homeless according to the following criteria as defined by section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302):
- The proposed rule, submitted for public comment, provided four possible categories under which individuals and families may qualify as homeless, corresponding to the broad categories established by the statutory language of the definition in section 103 of the McKinney-Vento Act, as amended by the HEARTH Act. Projects must serve clients that qualify as Homeless (HUD definition at 24 CFR Part 91 or At-Risk of Homelessness (HUD definition at 24 CFR Part 576) The final rule maintains these four categories. The categories are:
 - (1) Individuals and families who lack a fixed, regular, and adequate nighttime residence and includes a subset for an individual who resided in an emergency shelter or a place not meant for human habitation and who is exiting an institution where he or she temporarily resided;
 - (2) individuals and families who will imminently lose their primary nighttime residence;
 - (3) unaccompanied youth and families with children and youth who are defined as homeless under other federal statutes who do not otherwise qualify as homeless under this definition; and
 - (4) individuals and families who are fleeing, or are attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member. Throughout this preamble, all references to a number “category of homeless’ refer to this list.

Process Notes:

Upon identification, eligible applicants must complete an intake and assessment process with one of the ESG provider agencies.

As part of the intake process, all applicants will complete an income eligibility review. This is discussed in more detail in a later section of the manual.

Case managers from each agency will meet on a weekly basis to review these assessments and identify those that are selected for assistance. At time of identification, the ESG agencies will also assign participants to the appropriate agency for case management/assistance based upon their specific needs.

A review of client eligibility will be completed every 30 days during participation in the program to ensure ongoing eligibility for assistance.

See the Forms section of this manual for hard copies of all forms used by the program.

VII. TARGETED HOUSEHOLDS

A. RISK FACTORS FOR HOMELESS PREVENTION AND RAPID RE-HOUSING

The HOIHCOC ESG providers will target households to serve those who are most in need of this temporary assistance and most likely to achieve stable housing outside ESG. In addition to meeting all eligibility criteria, households will meet one or more of the risk factors as outlined below and have access to or potential for obtaining resources necessary to gain family self-sufficiency. It is expected that many of the households served will be at risk of homelessness due to the economic crisis.

- The household must be able to document a drop in income, severe housing cost burden, mental or physical illness or disability or other significant life changing event that limits their ability to maintain housing but for this assistance. Examples may include:
 - Experiencing short-term economic crisis due to sudden drop in income/increase in expenses
 - unemployment/ low-income
 - Individuals who are unemployed or underemployed or whose families income is insufficient to meet their housing costs and have already lost their housing
 - Formerly dual income households where one member is unemployed so there is not enough income to meet their housing costs
 - Unemployed persons who receive unemployment benefits but the benefit is insufficient to meet their housing costs
 - Extended medical leave/disability
 - Experiencing severe housing cost burden (greater than 50% of income for housing costs)
 - Extremely low income (less than 30% of AMI)
 - Currently residing in precarious or unsuitable housing
 - Family residing in a hotel
 - Periodic residency in multiple shelters but gainfully employed
 - Unable to reside in current unit for medical or safety reasons, (for example, client has medical documentation from a doctor stating that he/she must move due to a medical condition that cannot be accommodated or which is worsened by the household's current residence).
 - Discharge within 2 weeks from an institution in which the person has been a resident for more than 180 days (including prisons, mental health institutions, and hospitals)
 - Change in family composition
 - Change in household composition which puts the household over occupancy for the unit (the number of persons exceeds health and/or safety standards)
 - Loss of the household's primary financial provider
 - Eviction/foreclosure
 - Pending foreclosure of rental housing

- Persons experiencing eviction within 2 weeks (including housing provided by family or friends if the housing is no longer an option for them)
- Unable to reside in current unit for other reasons outside the client's control
 - Client's landlord has sold the building and it is no longer an option to lease there; Landlord refused to rent to client for any reason;
- Persons with residency in housing that has been condemned or deemed uninhabitable by the appropriate authority
- Personal foreclosure, short-sale
- Victims of violent crime, domestic violence or natural disaster
- Barriers complicating housing
 - Persons experiencing mental health, physical disabilities, & substance abuse issues that are a barrier to household income and housing
 - Persons previously experiencing homelessness within the last 12 months
 - Single expectant mothers
 - Persons experiencing significant life changing event such as past institutional care, trauma, credit problems, or medical debt that limits their ability to maintain housing

B. NON-DUPLICATION

HUD Guidelines

ESG specifies a household previously deemed ineligible, but which becomes eligible may continue to receive assistance but is not to exceed a total of 3 months of assistance. Additional financial supports will be determined at the discretion of the ESG agency using geographic boundaries and criteria for *Non-selection/Non-continuation*.

C. NON-SELECTION/NON-CONTINUATION (INITIAL/CONTINUING ELIGIBILITY)

Procedural Guidelines:

The ESG agency will make decisions regarding non-selection for participation in ESG at initial application or at recertification due to any of the reasons defined below. Criteria apply to both initial application and at time of quarterly reassessment.

Please note: Violent or drug related criminal activity related to a household receiving any type of rental assistance is grounds for immediate termination. Likewise, misrepresentation of eligibility by any household also provides reason for immediate separation from any program assistance.

- Household does not meet all eligibility criteria: Or
- Household does not complete all steps to establish eligibility in a timely manner: Or
- Misuse of program services by any household member; Or
- Household does not complete or refuses to engage in Recovery Plan objectives: Or
- Household non-readiness, as determined by the ESG providing agency, due to:

- Lack of “key” services from service providers in the community or an unwillingness/inability by the household to link to such key services; And/or
- Household’s misuse of resources, including personal resources such as income and benefits

Key resources are those resources or services that are integral to the household’s ability to achieve self-sufficiency.
Self-Sufficiency is defined as the household’s ability to maintain rent and household expenses independent of the ESG within a defined period of time.

- At the discretion of the ESG providing agency, based on the household’s use of current and past agency services - Including but not limited to: a review of the client’s previous participation in similar agency services, such as homeless prevention services, short-term case management or some equivalent data.

The ESG providing agency will make all reasonable efforts to link clients to services or advocate for provision of services before making a decision of non-selection.

VIII. SEPARATION GUIDELINES

Procedural Guidelines-

All assistance provided under ESG is subject to eligibility requirements and program guidelines. Final decisions regarding non-selection/non-continuation will be relayed in writing, to the household, by the ESG providing agency. The ESG agency will provide, when appropriate, information about helpful outside resources and the opportunity to re-apply to the program or to enter the program at a later date.

A formal separation process will, at a minimum, consist of the following:

- Written notice which includes date of termination, reason for termination, opportunity for appeal, and, if appropriate, any helpful resources to assist the participating household to maintain housing stability.
- Opportunity to appeal – Participating households which are selected for non-continuation are entitled to request a review of the decision with the opportunity to present oral or written objections before a person other than the person (or a subordinate of the person) who made or approved the termination decision. Final decisions regarding the appeal will be provided in writing.

IX. ELIGIBLE UNITS

Information regarding conflicts of interest, Nondiscrimination and Equal Opportunity Requirements and Fair Housing and Civil Rights laws are in effect.

A. RENT REASONABLENESS STANDARD

Rental assistance must comply with HUD's rent reasonableness standard, meaning the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private, unassisted market and must not be in excess of rents being charged by the owner for comparable non-luxury unassisted units.

Process Guidelines:

Comparable review can also be checked by:

- Using a market study, or
- Reviewing comparable units advertised for rent
- Written verification from the property owner of comparability of rent charged with other units owned.
-

The ESG providing agency should consider the following when determining rent reasonable:

- The location, quality, age, size, and type of the unit
- Any amenities, services and utilities to be provided by the owner

Visit www.hud.gov/offices/cpd/affordablehousing/library/forms/rentreasonablechecklist.doc for more information.

B. HABITABILITY STANDARD

HUD Guidelines:

ESG agencies will be required to conduct initial and any appropriate follow-up inspections of housing units if the participating household receives security deposit or short-term or medium-term rent assistance. Additional information can be found in Appendix C of the ESG notice dated March 10, 2009.

- For households with children 6 and younger, a visual inspection for lead based paint
- For all household's moving into a unit, a full inspection of a unit and additional annual inspections if assistance exceeds 12 months.

Process Guidelines:

The CoC has determined that it will conduct both a lead-based paint visual assessment (where required based upon age of housing unit and household make-up) and a habitability review for both Prevention and Rapid Rehousing support.

When a unit is determined to be inhabitable under the HUD standards, the agency will identify the unit as ineligible for ESG support and offer assistance to the participant in finding safe, affordable housing.

See the Forms section of this manual for hard copies of all forms used by the program.

C. LEASES

Process Guidelines

The provision of ESG rent assistance and security deposits seeks to ensure permanent housing stabilization.

- The landlord must agree to work with the ESG agency to accept voucher rent payment and to stop eviction proceedings upon receipt of signed voucher.
- Households may be assisted at the end of their lease term, if a move to another housing unit is necessary in order to ensure future housing stabilization.
- Month-to-Month leases – month-to-month leases reflect transience, and should be avoided generally. The landlord needs to be engaged in working on a long term lease arrangement.
- ESG agencies must have a copy of the valid lease to assist with rent. Valid leases must include signatures of both the client and/or a member of the household and the owner, and must be dated.
 - Recipients of ESG funds must have a legal right to reside in the unit and prove responsibility for paying the rent. As a general matter, if the eligible person is not named on a valid lease/rental agreement either as a tenant or an authorized occupant, the person has no legal right to reside in the unit and is therefore not eligible for rental assistance. However, if an applicant is listed as an occupant on a lease agreement and can prove through paid receipts in their name, money orders or cancelled checks that they pay rent or utility bills, even if the accounts are in the name of another household member, it is permissible to assist the applicant. The Grantee and project sponsor have responsibility for ensuring the eligibility of each household assisted with ESG funds. The eligibility assessment would determine if the total household income would be included, or if a shared leased housing arrangement is present, therefore counting only the applicant's income. While an oral lease for less than a year may be valid in some states, most states require a written lease to establish a legal tenancy and HOPWA adopts this clear standard. This position is also consistent with other HUD rental assistance programs, which require such documentation (e.g., HOME, Shelter Plus Care, Housing Choice Vouchers/Section 8). As a practical matter, not requiring a written lease may leave grantees in a vulnerable position in documenting ESG payments during audits and reviews.
 - A sublease is considered a legal lease. However, the grantee should be sure that the relationship between the participant/grantee/sub grantee and the landlord is not in violation of the conflict of interest provisions as stated in the ESG Notice. For example, the sublease agreement should not be between relatives or other parties where there is a potential conflict of interest.

X. DETERMINING TYPE, LEVEL AND DURATION OF ASSISTANCE

HUD advises that ESG assistance should be “need-based”, meaning that providing agencies should determine the amount of assistance based on the minimum amount necessary to prevent the program participant from becoming homeless or returning to homelessness in the near future. Upon approval of supervisor and only in emergency situations can ESG assistance exceed 3 months.

RENTAL ASSISTANCE

Maximum of three months of short term rental assistance will be provided. Amount of assistance will be based on the minimum amount necessary to prevent CL from becoming or returning to homelessness.

Procedural Guidelines - To ensure a consistent application of standards in determining rent amounts to ESG participating households, ESG providers will meet on a regular basis to review compliance with ESG program requirements.

Where Rapid Rehousing assistance is indicated, maximum of three months of short term rental assistance will be provided. Amount of assistance will be based on the minimum amount necessary to prevent CL from becoming or returning to homelessness.

HUD Guideline of eligible ESG services:

Financial assistance

- a) Short-term
 - i) Includes arrearages, rent, and Security deposit
 - ii) Utility arrearages (6 months max) and deposit
 - iii) Up to 3 months of ongoing assistance provided

Housing Relocation & Stabilization

- a) Short-term
 - i) Housing search and placement
 - ii) Housing stability case management
 - iii) Mediation
 - iv) Legal services
 - v) Credit repair

XI. HMIS STANDARDS

A. HMIS STANDARDS

HMIS is locally administered by the HOIHCOC locally referred to as HMIS or Homeless Management Information Systems. HMIS was developed by HUD to gather and analyze data to determine the effectiveness of McKinney-Vento Act Programs. HMIS provides the ability to: develop unduplicated

counts of clients served at the local level; analyze patterns of use of people entering and exiting the homeless system; and evaluate the effectiveness of those systems.

ALL ESG providing agencies must enter client-level data into the HOIHCOC HMIS unless prohibited by law. Baseline requirements include: Data collection; program descriptors; universal data elements; and program specific data elements. These elements are being revised for the implementation of ESG.

All ESG providing agencies must:

- Comply with federal, state and local confidentiality laws
- Comply with limits on data collection (relevant, appropriate, lawful and specified in privacy notice)
- Have a written policy and post it on agency website
- Must post a sign at intake or comparable location with general reasons for data collection and reference to the privacy policy

Information can be found in the following documents: *Homeless Prevention & Rapid Re-Housing Program (ESG) Quarterly Performance Reports: Elements, Response Categories and Justification*; *Homeless Management Information System (HMIS) Data Standards, Revised Draft Notice, April 2009*; and at www.HMIS.info

Process guideline:

ESG agencies should be prepared to promptly enter client and service level data into HMIS and share information within HMIS.

The head of household for each ESG participant unit must complete a release of information agreement related to HMIS data entry.

B. TRACKING SERVICES AND OUTCOMES

Services and program outputs must be tracked according to HMIS standards. See *ESG Performance Measures* for more information on tracking outcomes. To ensure consistency in tracking outcomes, ESG providing agencies must track outcomes for each activity as outlined on the Performance Measurements. Changes may be made to the performance measures, if agreed upon by the ESG providing agencies.

Additional performance outcomes may be proposed by the Continuum of Care HMIS Standards Committee. Consistent HMIS data entry will increase potential for continuum-wide ESG performance.

XII. CLIENT CONFIDENTIALITY

Each ESG providing agency must implement procedures to ensure the confidentiality of records pertaining to any individual provided with assistance and that the address or location of any assisted housing will not be made public.

There is no additional narrative for this section.