

**PINELLAS COUNTY CONSORTIUM'S
2011-2015 CONSOLIDATED STRATEGIC PLAN;
2011-2012 ACTION PLAN AND
FY 2011 EMERGENCY SOLUTIONS GRANT PROGRAM
SUBSTANTIAL AMENDMENT**

Overview

In accordance with its Citizen Participation Plan and U.S. Department of Housing and Urban Development (HUD) regulations, Pinellas County proposes to amend the Consortium's 2011-2015 Consolidated Strategic Plan and 2011-2012 Action Plan for the purpose of including new Emergency Solutions Grant funds and clarifying a project description.

The Gooden Crossing Infrastructure Project, originally approved in the 2011-2012 Action Plan, described the project as engineering, design and construction improvements including resurfacing, storm drainage and sidewalks. The project description should have specified the acquisition of property for right-of-way as part of the project description.

Additionally, the new Emergency Solutions Grants (ESG) program will be administered by Pinellas County Community Development to offer supportive services to homeless families and individuals; and implement effective homeless prevention and rapid re-housing initiatives within the local continuum of care.

Prior to the reauthorization of HUD McKinney-Vento programs (HEARTH Act), the program was known as the Emergency Shelter Grant program. Among other changes, the HEARTH Act amends the program name to Emergency Solutions Grant; updates the definition of homelessness; requires increased coordination and collaboration between the ESG Grantee and local Continuum of Care; requires adoption of performance and outcome measures; and encourages Grantees to build on successful homelessness prevention and rapid re-housing strategies developed through the ARRA-funded Homelessness Prevention and Rapid Re-housing Program (HPRP).

In Fiscal Year 2011, Pinellas County received an initial allocation of \$130,522 and a second allocation of \$73,419. The first allocation is through the Emergency Shelter Grant Program and the second allocation is through the Emergency Solutions Grant Program and subject to new regulations. The proposed activities for the original ESG funding identified in the FY 2011-2012 Action Plan for Pinellas County was to provide short term rental assistance; therefore, a total of \$203,941 will be available for homelessness prevention and rapid re-housing. The attached detailed budget outlines the proposed expenditures.

A. Required Contents of Emergency Solutions Grant Substantial Amendment

1. SF-424 (attached).

2. Summary of Consultation Process with the Continuum of Care

Pinellas County Community Development consulted with members of the Continuum of Care for the area. Sarah Snyder, Executive Director for the Homeless Leadership Board, convened a meeting held

in December 2011. Attendees asked to participate at the meeting included representatives from the City of St. Petersburg, Pinellas County Health and Human Services Department, and the City of Clearwater.

Discussions included providing input related to the success of the most recent Homelessness Prevention and Rapid Re-housing Program (HPRP) and the desire to replicate the established policies and procedures. There was also discussion of the need to focus on both aspects of the program; prevention of homelessness and rapid re-housing. Currently, Pinellas County is providing local financial resources to families at risk of homelessness. This program is a replication of the HPRP program and is administered by the Department of Health and Human Services; however, this program has the flexibility to serve families at 50% of Area Median Income (AMI). The consensus of the group was that since HPRP was effective, the new ESG program should be modeled after the HPRP program and should focus on families versus individuals. Additionally, even though the ESG funding must focus on incomes less than 30% AMI, the consensus was that the local program administered by the Department of Health and Human Services should continue to serve families at the 50% income level. The blend of the two programs will provide maximum flexibility in serving families in Pinellas County.

According to the “Strategic Homelessness Action Plan for the Pinellas County Area” there is a critical lack of units and services for families with children. This is at crisis levels. Every family service provider interviewed indicated approximately 10-20 families were being turned away on a daily basis. Because there is no central case management tracking system and there is no master waiting list, it is impossible at this time to ascertain how many families are not getting assistance. Dealing with families with children is so important since the children are innocent victims, and if not helped now, will create more expensive problems later.

3. Summary of Citizen Participation Process

The Substantial Amendment to the Action Plan was available to the public through advertisement in the *Tampa Bay Times* and on the Department’s website on March 9, 2012. The 30 day public comment period was March 9 through April 9, 2012.

Listed below is a summary of the comments received and how Pinellas County will address the comments: No comments were received.

4. Match Being Proposed

There will be two sources of matching funds provided. They include the Social Action Funding provided by Pinellas County in the amount of \$200,000 and \$150,000 of Community Development Block Grant Funding that is provided annually as part of the Continuum of Care Super NOFA process.

5. Proposed Activities and Overall Budget

5a. Proposed Activities

The first allocation of FY 2011-2012 was allocated to providing short-term rental assistance to prevent homelessness of families and individuals. The total set aside for this program was \$130,522.

Table 1: Declaration of FY 2010 Grant Fund Commitments

Activity Type	Obligated Amount
Homeless Assistance	
Homelessness Prevention	\$123,996
Administrative Activities	\$6,526
Total FY 2010 Award	\$130,522

The second allocation is being proposed for addressing short-term rental assistance for rapid re-housing of families. Both allocations are being proposed for short term rental assistance and total \$203,941, with 7.5% or \$15,295 for administration of the program. Community Development is proposing to coordinate with local non-profit providers to provide outreach and qualify households for the program. Providers will submit case files for final review and approval prior to funds being disbursed.

5b. Discussion of Funding Priorities

The Pinellas County Homeless Prevention and Rapid Re-housing Program quickly used the allocated \$1.2 million. While we originally thought the need was greater for rapid re-housing, 84 percent of the households served used prevention dollars. Those who were homeless generally required greater case management and services and had little or no income, making it difficult to find a landlord willing to rent to them, especially when they realized the funding was limited to short term assistance and that once the funding has been depleted, eviction may occur. The housing stabilization costs were significantly higher for clients needing rapid re-housing versus those needing prevention. As grantees are strongly encouraged to emphasize the rapid re-housing component, the Federal Plan to End Chronic Homelessness, and the limited amount of funding available, Pinellas County proposes to allocate the remaining funds to rapid re-housing categories. Based on HPRP costs, we are anticipating serving approximately 16 households. If the allocation can not be expended within required time frames, these dollars may be re-programmed to a homelessness prevention component.

5c. Detailed Budget

Pinellas County is not re-programming any funds from the first allocation. The detailed budget (Table 3) follows:

FY 2011 Detailed Budget Table						
First Allocation		\$130,522.00		FY 2011 <u>Emergency Shelter Grants/Emergency Solutions Grants</u> <u>Program Allocations</u>		
Second Allocation		\$73,419.00				
Grant Amount		\$203,941.00				
Total Administration		\$15,295.58				
		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	
	<i>Rehab/Conversion</i>				\$0.00	
	<i>Operations</i>				\$0.00	
	<i>Essential Services</i>				\$0.00	
	Homelessness Prevention	\$123,996.00				\$123,996.00
	Administration	\$6,526.00				\$6,526.00
	Emergency Shelter Grants Subtotal	\$130,522.00	\$0.00		\$130,522.00	
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00	
	<i>Renovation**</i>			\$0.00	\$0.00	
	<i>Operation**</i>			\$0.00	\$0.00	
	<i>Essential Service**</i>			\$0.00	\$0.00	
	<i>URA Assistance**</i>			\$0.00	\$0.00	
	Street Outreach - Essential Services**			\$0.00	\$0.00	
	HMIS				\$0.00	
	Rapid Re-housing		\$0.00	\$64,649.42	\$64,649.42	
	<i>Housing Relocation and Stabilization Services</i>			\$15,000.00	\$15,000.00	
	<i>Tenant-Based Rental Assistance</i>			\$49,649.42	\$49,649.42	
	<i>Project-Based Rental Assistance</i>				\$0.00	
	Homelessness Prevention		\$0.00	\$0.00	\$0.00	
	<i>Housing Relocation and Stabilization Services</i>				\$0	
	<i>Tenant-Based Rental Assistance</i>				\$0	
	<i>Project-Based Rental Assistance</i>				\$0.00	
	Administration			\$8,769.58	\$8,769.58	
	Emergency Solutions Grants Subtotal		\$0.00	\$73,419.00	\$73,419.00	
				Total Grant Amount:	\$203,941.00	

**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).

6. Written Standards for Provision of ESG Assistance

Pinellas County Community Development proposes to administer the program in the same manner as the HPRP funding. Staff will outreach to various non-profit agencies to provide an awareness of the available funding. The agencies will provide the counseling and processing of applications to determine eligibility for the program. All documentation will be submitted to Community Development for final approval and disbursement of funds.

There will be coordination among emergency shelter providers, essential services providers, homelessness prevention and rapid re-housing assistance providers, and other homeless assistance providers to maximize the use of the ESG funding and ensure that there is a centralized effort to reach families in need.

The following eligibility requirements have been established for the rapid re-housing and/or prevention components of the program.

- The program participant must meet the criteria under paragraph (1) the “at risk of homelessness” definition or who meet the criteria in paragraph (2), (3), or (4) of the homeless definition in 576.2 for homeless prevention assistance. A homeless certification form will be required.
- The household income must be less than 30% AMI. Annual income will be calculated using the standards for calculating income under HOME and Section 8 income guidelines.
- The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance (but for this assistance they would be homeless).
- Complete a one-on-one assessment for sustainability with staff.
- Ensure that the rent for a subsidized unit does not exceed the established fair market rent for the area and that the unit meets the rent reasonableness test.

The maximum amount that can be provided by the program is \$3,000 and is based on the families need and not a set amount. In addition, Pinellas County providers are required to utilize the Tampa Bay Information Network (TBIN), a shared database to ensure that there are no duplicated services being provided.

The following will definitions will be utilized when documenting eligibility for the program:

- Homeless Certification.
- Persons living on the street - It is sufficient for the agency’s staff to certify that the persons served, indeed, reside on the street. The outreach or service worker should sign and date a general certification verifying that services are going to homeless persons and indicating where the persons reside.
- Persons coming from living on the street - The agency should obtain information to indicate that a participant is coming from the street. This may include names of other organizations or

outreach workers who have assisted them in the recent past who might provide documentation. If you are unable to verify that the person is coming from residing on the street, have the participant prepare or you prepare a written statement about the participant's previous living place and have the participant sign the statement and date it. Merely obtaining a self-certification is not adequate. If the participant was referred by an outreach worker or social service agency, you must obtain written verification from the referring organization regarding where the person has been residing. This verification should be on agency letterhead, signed and dated.

- Persons coming from an emergency shelter for homeless persons - The agency should have written verification from the emergency shelter staff that the participant has been residing at the emergency shelter for homeless persons. The verification should be on agency letterhead, signed, and dated.
- Persons coming from transitional housing for homeless persons - The agency should have written verification from the transitional housing facility staff that the participant has been residing in the transitional housing. The verification should be on agency letterhead, signed and dated. The agency should also have written verification that the participant was living on the streets or in an emergency shelter prior to living in the transitional housing facility or was discharged from an institution or evicted prior to living in the transitional housing facility and would have been homeless if not for the transitional housing.
- Persons from a short-term stay (up to 30 consecutive days) in an institution - The agency should have written verification from the institution's staff that the participant has been residing in the institution for 30 days or less. The verification should be signed and dated. The agency also should have written verification that the participant was residing on the street or in an emergency shelter prior to the short-term stay in the institution.
- Persons being evicted from a private dwelling - The agency must have evidence of the formal eviction proceedings indicating that the participant was being evicted.

Description of Income:

The requirements for determining whether a family is eligible for assistance, and the amount of rent the family will pay, requires the lead agency to project or estimate the annual income that the family expects to receive. Annual income refers to all gross amounts received before taxes or other deductions.

Income Includes:

- Earned Income - amount of gross income earned before taxes and deductions.
- Business Income - net income earned from the operation of a business, i.e., total revenue minus business operating expenses. This also includes any withdrawals of cash from the business or profession for your personal use.
- Interest & Dividend Income - monthly interest and dividend income credited to an applicant's bank account and available for use.
- Pension/Retirement Income - monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.

- Unemployment & Disability - monthly payments in lieu of earnings, such as unemployment, disability, income compensation, SSI, SSDI, and worker's compensation.
- TANF/Public Assistance - monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
- Alimony, Child Support and Alimony, child support and foster care payments received from organizations or Foster Care Income persons not residing in the dwelling.
- Armed Forces Income - basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.
- Adoption Assistance Payments - adoption assistance payments received from agencies or organizations.
- Death Benefits - payments received from a company, agency or organization upon the death of a family member.
- Veteran's Payments - payment made to veterans from an agency or organization.
- Severance Pay - income received from a severance package from a former employer.
- Gifts and Contributions - gifts or contributions received on a regular, recurring basis.
- Property Income - income received from property owned, either monthly, or lump sum.
- Dependent Income - unearned income of minors, such as Social Security or SSI benefits, (2) Income from asset owned by minors.

Income Excludes:

- Income of Children - income from employment of children (including foster children) under the age of 18 years.
- Inheritance and Lump - sum additions to family assets, such as inheritances, insurance payments
- Insurance Income - (including payments under health and accident insurance and worker's compensation), capital gains and settlement for personal or property losses.
- Medical Expense - amounts received by the family that are specifically for reimbursement.
- Income of Live-in Aides - income of a live-in aide (as defined in 24 CFR 5.403).
- Disabled Persons - certain increases in income of a disabled member of qualified families residing in HOME assisted housing or receiving HOME tenant-based rental assistance (24 CFR 5.671(a)).
- Student Financial Aid - the full amount of student financial assistance including scholarship and grants, which is used to cover tuition and books. Can be paid directly to the student or to the educational institution.
- Armed Forces Hostile Fire Pay - the special pay to a family member serving in the Armed Forces who is exposed to hostile fire.
- Self-Sufficiency
 - a. Amounts received under training programs funded by HUD.
 - b. Amounts received by a person with a disability that are disregarded for a limited time for purposes of Supplemental Security Income eligibility and benefits because they are set aside for use under a Plan to Attain Self-Sufficiency (PASS).
 - c. Amounts received by a participant in other publicly assisted programs that are specifically for, or in reimbursement of, out-of-pocket expenses incurred (special equipment, clothing, transportation, childcare, etc.) and which are made solely to allow participation in a specific program.
 - d. Amounts received under a resident service stipend. A resident service stipend is a modest amount (not to exceed \$200 per month) received by a resident for performing a service for the PHA or owner, on a part-time basis, that enhances the quality of life in the development. Such

services may include, but are not limited to, fire patrol, hall monitoring, lawn maintenance, resident initiatives coordination, and serving as a member of the PHA's governing board. No resident may receive more than one such stipend during the same period of time.

e. Incremental earnings and benefits resulting to any family member from participation in qualifying state or local employment training programs including training not affiliated with a local government) and training of a family member as resident management staff. Amounts excluded by this provision must be received under employment training programs with clearly defined goals and objectives, and are excluded only for the period during which the family member participates in the employment training program.

- Gifts - temporary, nonrecurring, or sporadic income (including gifts).
- Income from Full-time Earnings in excess of \$480 for each full-time student 18 years old or older Students (excluding the head of household or spouse).
- Adoption Assistance Payments - adoption assistance payments in excess of \$480 per adopted child.
- Social Security & SSI Income - deferred periodic amounts from SSI and Social Security benefits that are received in a lump sum amount or in prospective monthly amounts.
- Property Tax - amounts received by the family in the form of refunds or rebates under Refunds state or local law for property taxes paid on the dwelling unit.
- Home Care Assistance - amounts paid by a state agency to a family with a member who has a developmental disability and is living at home to offset the cost of services and equipment needed to keep this developmentally disabled family member at home.

7. Process for Making Sub-Awards

Pinellas County Community Development developed and administered approximately \$1.2 Million of HPRP funding. The Emergency Solutions Grant Program has been modeled after HPRP and staff proposes to coordinate with key non-profit providers who have capacity to administer the program and provide the necessary training for meeting the requirements of the program. Providers will process applications and once complete, the file will be submitted to Community Development for final approval and disbursement of funding.

8. Homeless Participation Requirement

Pinellas County Community Development is unable to meet the requirement of 576.405 (a) as the Board is made up of elected officials. However, through coordination efforts with the local Continuum of Care provider, the Homeless Leadership Board, we will receive input from homeless or previously homeless individuals, as they are part of the Continuum process. Throughout the development of the HPRP Program, input was provided by the Continuum in the establishment of the policies.

9. Performance Standards

Agencies receiving ESG funds will be monitored annually to insure that program guidelines are being followed. In addition, before reimbursement can be made verification will be required including certification of homelessness, lease documents, and income calculations, as well as cancelled checks and invoices. A contract will be developed requiring quarterly reimbursement requests and timely expenditure of funds.

10. Certifications

The required certifications are attached.

B. Emergency shelter and outreach activities.

Pinellas County does not plan to use any of the second allocation of FY2011 Emergency Solutions Grant for street outreach and emergency shelter allocations. The amount of the emergency shelter grant activity is less than the FY2010 allocation for emergency shelter.

C. Community Development does not intend to use the risk factor under paragraph (1)(iii)(G) of the “at risk of homelessness” definition.

D. Our centralized/coordinated assessment system is through HMIS.

Our monitoring procedures will be conducted the same as the HPRP program, including verification of income and homeless documentation. An experienced staff person is assigned to this program.