

City of Springfield, MA
Emergency Solutions Grant (ESG) FY2011 Second Allocation
Substantial Amendment

1. ESG Grantee Information

ESG Program Administrator Contact Information	
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Phone Number	(413) 787-6500
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2. Declaration to HUD of FY10 Grant Funds Commitments

Activity Type	Obligated Amount
Homeless Assistance	\$127,200
Homelessness Prevention	\$46,613.90
Administrative Activities	\$9,148.10
Total FY 2010 Award	\$182,962.00

3. Summary of Consultation Process

The City met with the Springfield Continuum of Care at its regularly-scheduled February 16, 2012 meeting. The meeting agenda, sent to all CoC members in advance of the meeting, indicated that one of the agenda items was a discussion of ESG funding priorities and guidelines.

The CoC reported that the Homeless Prevention and Rapid Rehousing Program (HPRP) that had been set up was very effective, but no longer has available funds for financial assistance. CoC members stated that there is a critical need in the community for this type of funding, and that it would be optimal to use the 2011 second allocation of ESG funds for this purpose. The CoC agreed that the quickest and most equitable way to distribute the second allocation of ESG funds would be to provide them to the City's two HPRP subrecipients, in the same proportion that HPRP funds were apportioned between the two subrecipients.

The City is taking the approach recommended by the CoC. The two entities that will be funded are HAP Housing and Catholic Charities. Each of these agencies will receive an allocation of funds that may be used for diversion and rapid rehousing.

The CoC is just beginning to create performance standards, and is unable to provide detailed performance standards and also be able to make the second allocation of FY11 ESG funds available quickly. For this round of ESG funds, the CoC will set a baseline and measure performance for number of households that move to permanent housing within 30 days of entering shelter. The CoC is also setting baselines and beginning to measure performance system-wide regarding: incidence of homelessness, average length of time that people are homeless, level of first-time homelessness, and amount of repeat homelessness.

The Springfield CoC has an existing HMIS and well-established funding, policies and procedures for the operation and administration of the HMIS. The two HPRP providers used this HMIS for data collection and reporting for that program, and will continue to use the HMIS for reporting regarding use of ESG funds.

4. Public Comment: Citizen Participation Process

The City placed an advertisement in the local newspaper, in both English and Spanish, indicating that the plan would be available for comment for the period March 1 through March 14, 2012, and indicating where the plan could be accessed. On March 1, 2012, the City posted the plan to its website and made it available in paper form in the City’s Office of Housing and Office of Community Development.

[Summary of Public Comments Received.]

5. Match

The following table shows the types, amounts, and proposed uses of matching funds:

Funding Type	Amount	Proposed Use of Funds
MA HomeBase Program	\$62,383.48	Direct financial assistance to family households for diversion and rapid rehousing
Catholic Charities Agency Social Services assistance funding	\$26,735.77	Direct financial assistance to individuals for diversion and rapid rehousing
City of Springfield CDBG	\$12,088.75	City grant administration
TOTAL	\$101,208.00	

6. Proposed Activity

The City proposes to use the second allocation of FY11 ESG funds, as well as \$30,000 in repurposed funds from the first FY11 ESG allocation, for Rapid ReHousing—Rental Assistance.

Attachment A, “Table 3C” Consolidated Plan Listing of Projects, provides additional detail regarding the proposed activity.

7. Discussion of Funding Priorities

The City is spending the entire second allocation of FY11 ESG funds to support the homeless crisis response system that was established using HPRP funds. That system has two tracks: one for families, and one for individuals. For families, HAP’s Housing and Consumer Education Center is the primary

contact for family households seeking diversion or rapid rehousing assistance. For individuals without children, there is a partnership between Catholic Charities and Friends of the Homeless which serves as the entry point for diversion and rapid rehousing assistance.

For both families and individuals without children, financial assistance is available to assist households that are homeless or are imminently at risk of homelessness to obtain housing.

The City's funding priorities for these funds is in alignment with Objective 10 of *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, which is "Transform homeless services to crisis response systems that prevent homelessness and rapidly return people who experience homelessness to stable housing." Our priorities also further the goals of the City's 10-year Plan to End Homelessness, *Homes Within Reach*, which calls for an emphasis on prevention and rapid rehousing.

8. Detailed Budget

The City's detailed budget for the second allocation of FY11 ESG funds is included with this Substantial Amendment as Attachment B.

9. Written Standards for Providing ESG Assistance

The City, in consultation with the CoC, will be preparing comprehensive standards for providing ESG assistance over the next several months, as part of its Consolidated Plan Annual Action Plan process. In order to make critically needed prevention, diversion and rapid rehousing assistance available more quickly, it has established abbreviated standards to be applied to this second allocation of FY11 ESG funds, which are based upon standards established for HPRP. The City's written standards for providing ESG Assistance are as follows:

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

- Must be currently homeless or at risk of homelessness as defined in 24 CFR § 576.2.
- Case files must include a completed eligibility form and certification (which meets HUD specifications) that the household meets the eligibility criteria.
- For households meeting the definition of "at risk of homelessness", case files must include all documentation required by 24 CFR § 576.500.
- For each individual and family determined ineligible to receive ESG assistance, the record must include documentation of the reason for that determination.
- Records must be kept for each program participant that document: the services and assistance provided to that program participant; compliance with requirements under 24 CFR §§ 576.101-106, 576.401 (a) and (b), and 576.401 (d) and (e); and, where applicable, compliance with the termination of assistance requirement in § 576.402.
- **Eligible Uses of Funds:** Funds may be used for rental application fees, security deposit, last months' rent, utility payments/deposits, moving cost assistance, and short-term rental assistance. Funds may be paid only to a third-party provider; they may not be provided directly to the person applying for assistance.

- b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and other homeless assistance providers, and mainstream service and housing providers.**
- Providers of ESG prevention/diversion and rapid rehousing assistance must
 - a. make assistance available to all eligible Springfield households without regard to what agency provides shelter to the household;
 - b. provide clear guidance to other Springfield providers about eligibility requirements and how to access assistance; and
 - c. undertake targeted outreach to providers who serve victims of domestic violence, and create clear pathways for their clients to access assistance.
- c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families will receive rapid re-housing assistance.**
- Assistance may be provided only to households with income at or below 30% of area median income.
- d. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid rehousing assistance.**
- Program participants must pay a minimum of 30% of adjusted income for monthly rent, with the exception of the first months' rent, for which ESG can pay up to the full amount. Income will be calculated using standards in place for HPRP.
- e. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of assistance will be adjusted over time.**
- The ESG program will be used only to provide short-term, time-limited assistance; there will not be any continuing eligibility review or review to determine if further ESG assistance is required.
- f. Standards for determining the type, amount and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid rehousing assistance that each program participant may receive, such as maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.**
- The ESG program will not pay more than a total of 3 months rental assistance for any program participant.
 - The maximum amount of assistance for any household is \$2500.
 - Program participants may not receive assistance more than one in any 12-month period.

10. Certifications

General Certifications

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

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

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

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

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction.

Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -

(a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;

2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and

3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

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

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

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

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

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

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

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

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

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

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

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

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

CDBG Certifications

The Entitlement Community certifies that:

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

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

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

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

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

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other

revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

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

Excessive Force -- It has adopted and is enforcing:

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

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

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

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

Signature/Authorized Official

Date

Title

ATTACHMENT A

Table 3C
Consolidated Plan Listing of Projects

Jurisdiction's Name City of Springfield

Priority Need
Homeless

Project
ESG

Activity
Rapid Rehousing—Rental Assistance

Description
The Rapid Rehousing—Rental Assistance Program will provide diversion and rapid rehousing financial assistance to 80 households.

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

Location/Target Area:
Springfield, MA

Specific Objective Number SL-1	Project ID
HUD Matrix Code 03T	CDBG Citation N/A
Type of Recipient Grantee/Subrecipients	CDBG National Objective N/A
Start Date (mm/dd/yyyy) 4/1/2012	Completion Date (mm/dd/yyyy) 4/30/2013
Performance Indicator People	Annual Units 80
Local ID	Units Upon Completion

Funding Sources:

CDBG
ESG	\$117,119.25
HOME
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total

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

Table 3C
Consolidated Plan Listing of Projects

Jurisdiction's Name City of Springfield

Priority Need
Planning & Administration

Project
ESG

Activity
Administration

Description
The Office of Housing will use these funds for the planning & execution of the ESG Program, including planning, general management and oversight.

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

Location/Target Area:
Springfield, MA
(Street Address):
(City, State, Zip Code):

Specific Objective Number N/A	Project ID
HUD Matrix Code 21A	CDBG Citation N/A
Type of Recipient Grantee/Subrecipients	CDBG National Objective N/A
Start Date (mm/dd/yyyy) 4/1/2012	Completion Date (mm/dd/yyyy) 4/30/2013
Performance Indicator N/A	Annual Units N/A
Local ID N/A	Units Upon Completion N/A

Funding Sources:

CDBG
ESG	\$12,088.75
HOME
HOPWA
Total Formula
Prior Year Funds
Assisted Housing
PHA
Other Funding
Total

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

FY 2011 Detailed Budget Table

First Allocation		\$179,926.00	FY 2011		
Second Allocation		\$101,208.00	Emergency Shelter Grants/Emergency Solutions Grants		
Grant Amount		\$281,134.00	Program Allocations		
Total Administration		\$21,085.05			
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$116,041.70	\$20,000.00		\$96,041.70
	<i>Rehab/Conversion</i>	\$0.00	\$0.00		\$0.00
	<i>Operations</i>	\$70,000.00	\$0.00		\$70,000.00
	<i>Essential Services</i>	\$46,041.70	\$20,000.00		\$26,041.70
	Homelessness Prevention	\$54,888.00	\$10,000.00		\$44,888.00
	Administration	\$8,996.30	\$0.00		\$8,996.30
Emergency Shelter Grants Subtotal		\$179,926.00	\$30,000.00		\$149,926.00
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		\$0.00
	Rapid Re-housing		\$30,000.00	\$87,119.25	\$117,119.25
	<i>Housing Relocation and Stabilization Services</i>		\$18,000.00		\$18,000.00
	<i>Tenant-Based Rental Assistance</i>		\$12,000.00	\$87,119.25	\$99,119.25
	<i>Project-Based Rental Assistance</i>		\$0.00		\$0.00
	Homelessness Prevention		\$0.00	\$0.00	\$0.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$0.00	\$0
	<i>Tenant-Based Rental Assistance</i>		\$0.00		\$0
	<i>Project-Based Rental Assistance</i>		\$0.00		\$0.00
	Administration			\$12,088.75	\$12,088.75
Emergency Solutions Grants Subtotal			\$30,000.00	\$99,208.00	\$129,208.00
			Total Grant Amount:		\$279,134.00

**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).