

County of Santa Barbara
Substantial Amendment to the FY 2011 Action Plan
Second Allocation of Emergency Solutions Grants Program Funds



County of Santa Barbara
Department of Community Services
Division of Housing and Community Development
105 East Anapamu Street, Suite 105
Santa Barbara, CA 93101
Email: HCD@co.santa-barbara.ca.us
Website: www.countyofsb.org/housing

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Substantial Amendment to the FY 2011 Action Plan

Second Allocation of Emergency Solutions Grants Program Funds

I. Overview

As originally adopted, the federal McKinney-Vento Homeless Assistance Act included funds for the Emergency Shelter Grants Program. The objectives of the program were to increase the number and quality of emergency shelters and transitional housing facilities for homeless individuals and families, to operate facilities and provide services, and prevent homelessness. Major revisions came with passage of the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH). The original Emergency Shelter Grants program became the new Emergency Solutions Grants (ESG) program. The new emphasis is to help individuals and families experiencing a housing crisis to quickly regain stability in permanent housing, to assist those at risk of homelessness, and to provide related services. The new program covers many aspects that were provided by the federal Homelessness Prevention and Rapid-Re-Housing Program (HPRP) which will expire in August 2012.

On November 15, 2011, the United States Department of Housing and Urban Development (HUD) posted an Interim Rule for the new program, and announced a second allocation of 2011 ESG program funds. The Interim Rule was published in December 2011 and went into effect January 4, 2012. Due to the program revisions, a two-staged allocation process was implemented, with the first allocation (\$88,475) released in May 2011. The second 2011 allocation will bring \$49,767 in additional ESG funds to the County. The total allocation for 2011 for ESG is \$138,242.

The County of Santa Barbara Community Services Department (CSD), Division of Housing and Community Development, prepared this substantial amendment to the County's 2011 Action Plan in order to participate in the second 2011 ESG allocation pursuant to important new ESG regulations.

HUD increased the 2011 ESG administration allowance from 5 percent to 7.5 percent to assist staff in meeting the new requirements. The 2011 ESG Substantial Amendment and the 2012 Action Plan are due to HUD on May 15, 2012; because the requirements and timelines are similar, this Amendment has been coordinated with the 2012 Action Plan process.

II. Purpose of Substantial Amendment

HUD's purpose in requiring the amendment is to:

- Increase the County's collaborative efforts with service providers, Continuum of Care partners, and the public to have an immediate impact in helping the homeless;
- Require extensive planning, data and policy analysis;

- Improve program outcomes with the development of standards and procedures covering program design, implementation, evaluation and monitoring; and
- Meet the critical need for rapid re-housing activities assisting individuals and families who may have experienced a recent housing crisis and are living on the streets or in emergency shelters, to quickly regain stability in permanent housing

This Substantial Amendment is consistent with ESG requirements, the Consolidated Plan, Action Plan, and the County's Citizen Participation Plan.

III. Coordination and Collaboration

Goal: Develop a Strategic, Countywide System for Addressing the Needs of the Homeless

A. Development of the Substantial Amendment

On February 16, 2012, County CSD staff conducted an intensive one-day outcome-oriented "Charette" with key stakeholders in order to obtain quality, comprehensive and diverse input to meet or exceed HUD's directive. Homeless service providers, County and city government and quasi-government officials, previously homeless individuals and members of the County Human Services Commission met with CSD staff to assist with the preparation of the Substantial Amendment. See Appendix I for copies of sign-in sheets from the Charette. Attendees were asked to provide input on how to improve collaboration and outreach between the County and service providers, and among service providers themselves, when assessing needs of the homeless and preparing solutions. After the Charette, CSD staff notified all 2012 NOFA applicants that they could amend their 2012 applications to also compete for the 2011 Second Allocation that was set aside for homelessness prevention or rapid re-housing activities. On March 5, 2012 and March 8, 2012 the County's Human Services Commission Allocations Committee held all day interviews, meeting with applicants to be better able to assess priority projects, organizational capacity and program readiness and to prepare funding recommendations for ESG programs to the County Board of Supervisors.

Through contracts with providers, the County will ensure coordination and integration of homeless program components among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, and mainstream services and housing providers to achieve a strategic, community-wide system for serving the homeless. The County will continue to collaborate with local jurisdictions in addressing homeless needs, with the intent of strengthening the Continuum of Care.

Participants who attended the Charette and others interviewed through individual consultations with CSD staff indicated a strong desire for broader input and collaboration regarding homeless needs and issues. Increased interaction and collaboration between service providers and "mainstream" service organizations such as public agencies that interact with the homeless was identified as an important element for improving the County's outcomes. County departments, including Public Health; Alcohol, Drug and Mental Health, Social Services and the Sheriff, were identified as necessary partners. The Charette not only helped with the Substantial Amendment, but also resulted in progress toward CSD's goal of improving the County's Continuum of Care.

In addition to the Charette, and as required by the County's Citizen Participation Plan, there were other opportunities for public input including public workshops and a 30 day public review period. CSD staff also conducted one- on-one consultations with key service providers to obtain additional input for the Amendment.

B. Ongoing Collaboration and Coordination

The County will build on the momentum from the Charette to work towards the goal of developing a comprehensive countywide system to meet the needs of the homeless. The County is an active partner in a countywide initiative that seeks to coordinate already existing governmental and nonprofit agencies, committees, and advocacy groups.

Although many agencies and groups throughout the County are actively working to serve homeless families and individuals, too often there has been a lack of communication and collaboration among them which has resulted in less efficiency and effectiveness. In order to remedy this situation, a planning group was formed; it was initially comprised of representatives from the County's Ten-Year Plan (known as "Bringing Our Community Home") and Santa Barbara's "Common Ground" organization. The vision of this planning group is congruent with the County's vision for an improved Continuum of Care.

Potential elements of a coordinated system may include:

- Identification of essential groups that play a role in homeless services and creation of a clearly articulated system for communication among them
- A coordination committee to receive information and input from all groups and facilitate communication among them; and
- Potential groups include:
 - a) Elected officials with policy-making and funding authority
 - b) Emergency and transitional shelter providers
 - c) Street outreach teams, low-income housing providers, permanent supportive housing providers
 - d) Community action groups
 - e) Data and performance evaluation committee

The overarching goals of the coordinated system are to:

- Assess homeless needs
- Develop priorities
- Standardize eligibility determinations
- Target resources
- Strengthen resources for formerly homeless persons after they have received re-housing services
- Leverage resources for people receiving homeless prevention services
- Increase consistency between Consolidated Plan and Continuum of Care homeless needs data
- Participate in HUD's centralized system to initially assess the eligibility and needs of each homeless individual or family and match them with appropriate resources
- Improve upon planning, data and policy analysis

To reach its goals, partners in the system will:

- Coordinate outreach, intake and assessment, emergency shelter, transitional housing and permanent and supportive housing needs
- Involve individuals who have experienced homelessness who will provide valuable insight related to what works and what are the gaps and resource needs
- Develop a community plan to organize and deliver housing and services to meet the needs of people who are homeless as they move to stable housing and maximize self-sufficiency
- Include the following organizations in on-going Continuum of Care collaboration about homeless needs and solutions: Nonprofit service providers including all shelter and transitional housing operators, victim service providers, faith-based organizations, government organizations including education, housing and community development, businesses, legal aid, child welfare services, foster children, public housing agencies, schools, social service providers including elderly, youth, children and veterans, therapeutic counseling/life skill training organizations, health clinics (medical, dental, mental health, drug and alcohol), sober living providers, hospitals, universities, affordable housing developers, law enforcement, homeless and formerly homeless individuals, Medicaid, employment and job training, the courts (e.g., restorative policing), commissions, committees or councils currently working on homeless needs and issues.

The County will continue to maximize community-wide planning and the strategic use of resources by working with Continuum of Care organizations. As a part of this collaborative effort, critical determinations will be made about how to achieve goals. Partnerships will be strengthened to take on challenges, reach target populations, reduce duplication and streamline service efforts. Programs and services will continually be evaluated.

IV. Citizen Participation Process

A. Public Review Period & Citizen Comments

A notice of the Substantial Amendment's availability for public review was published in two newspapers of regional circulation on April 4, 2012 announcing a public review period from April 4, 2012 through May 4, 2012. The notice invited the public to review the document and to provide comments to CSD for consideration. Two public meetings were held for the public to provide comments. The meetings were held on April 2, 2012 (North County-Santa Maria) and April 4, 2012 (South County- Santa Barbara).

The Board of Supervisors public meetings on May 1, 2012 and May 8, 2012 provided additional opportunity for feedback; notices of the public hearings were published ten days in advance. The Substantial Amendment was also emailed out to all Charette Participants for additional review and feedback.

Copies of the draft Substantial Amendment were made available for review at CSD offices, County administration buildings in Santa Maria and Santa Barbara, relevant departments of each consortium member, the administrative offices of the Housing Authority of the County of Santa Barbara, and 12

public libraries throughout the County. A Spanish translation of the Executive Summary was also made available upon request to accommodate Spanish speaking individuals.

Copies of the public notices, agendas and Charette sign-in sheets are provided in the Appendix.

B. Comments Not Accepted

Not Applicable. All comments were duly noted and included in the Action Plan.

V. Policies for Emergency Solutions Grants Program Management

The County will implement the policies below for managing the Emergency Solutions Grants (ESG) program.

Goal: End homelessness by emphasizing a housing stability approach

Policy 1

Increase leadership, collaboration and public input across all sectors.

- Strengthen the County's role as the lead agency for the Continuum of Care to address homeless needs and services through closer collaboration with other County departments and nonprofit service providers
- Improve strategic planning and program oversight to increase community participation and input from existing or previously homeless persons

Policy 2

Shift from Emergency Shelters to Emergency Solutions and target populations who are homeless or at imminent risk of homelessness by emphasizing rapid re-housing services.

Target Populations:

- Align resources with most "at risk" individuals and families that have the greatest chance of success.
- Providers must establish clearly defined strategies for:
 - a. Identifying individuals/families recently living on the streets or emergency shelters
 - b. Rapidly assisting them to re-gain stability
 - c. Identifying key obstacles in meeting the needs of homeless with high priority needs
- Providers must direct participants requiring longer-term housing assistance and services to other programs.

Eligibility and Certification:

- Ensure that program participants are at or below 30 percent of area median income (AMI) for homelessness prevention or 50 percent of AMI for rapid re-housing
- Ensure that all program participants are eligible through consistent, comprehensive and accurate data collection, initial certification and re-certifications
- Annual income initially and at recertification must include current gross income of all adult household members including unemployment and disability income, pension or retirement

- income, interest and dividend income, business income, alimony, and unearned income attributable to a minor, (i.e. child support, TANF, SSI, others)Income that is not counted can include income of children, inheritance and insurance income, medical expense reimbursements, disabled persons, student financial aid, self-sufficiency program income, reparations, income from full-time students, adoption assistance payments, deferred and lump sum social security and SSI payments, income tax and property tax refunds, and other federal exclusions
- Recertify program participant eligibility at least every three months before providing a fourth month of assistance
 - Ineligible activities include needs that can be met with other resources or programs, for example: Child care, employment and training, mortgages, construction or rehabilitation, credit card bills or other consumer debt, car repair or transportation, travel costs, food, medical or dental costs or medicine, clothing and grooming, home furnishings, pet care, entertainment, certifications, licenses and general training classes

Policy 3

Increase stability for homeless individuals and families.

- Transform the homeless crisis response system by creating systems to prevent homelessness and rapidly return people who experience homelessness to stable housing
- Increase access to stable and affordable housing for people experiencing or most at-risk of homelessness by providing permanent supportive housing to prevent and end homelessness
- Increase economic security, meaningful and sustainable employment for homeless and at risk homeless populations through life-skills and employment training
- Improve health and stability by integrating primary and behavioral health care services with homeless assistance and housing programs to reduce people’s vulnerability to homelessness
- Advance health and housing stability for youth and people who have frequent contact with hospitals and criminal justice
- Ensure written lease agreements to protect individuals and families in crisis

Policy 4

Ensure that projects comply with the Consolidated Plan, Action Plans and the Citizen Participation Plan as amended by the Interim Rule.

- Project budgets shall reflect Action Plan objective categories (e.g. decent housing) and the appropriate outcome category (availability/accessibility, affordability, or sustainability) as listed in the Notice of Outcome Performance Measurement System (71 FR 11470) dated March 7, 2006
- The County will use locally relevant data, national priorities, citizen participation and consultations to support decisions regarding grant funding
- The Homeless Management Information System (HMIS) will be administered by CSD and participation is required of for all subrecipients. The County and service providers will collaborate in the Homeless Management and Information System (HMIS) and track similar data with consistency and accuracy
- Subrecipient allocations will be made to private nonprofit organizations and/or participating units of local government by combining the FY2011 second allocation with the 2012 allocation, with the understanding that the second allocation is strictly awarded to

homelessness prevention or rapid re-housing activities (existing FY2012 ESG applicants had an opportunity to adjust their applications accordingly)

- Within 180 days of when HUD signs the grant agreement with the County, ensure that grant funds are obligated except administrative costs
- The County will create and disseminate an ESG Policies and Procedures manual to all partner agencies

Policy 5

Continue to review homeless and at-risk of homelessness definitions to ensure that programs and services are available to all eligible persons.

The County's current definitions of homelessness and at-risk of homelessness follow:

- A. HUD's Definition (24 CFR 576.2(1)(i), (ii) and (iii)):
 - 1. An individual or family who has an annual income below 30 percent of the area median income for the area
 - 2. Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks immediately available to prevent them from moving to an emergency shelter and meets one of the following conditions:
 - a. Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - b. Is living in the home of another because of economic hardship;
 - c. Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - d. Lives in a hotel or motel and the cost of the stay is not paid by charitable organizations or by Federal, State or local government programs for low-income individuals;
 - e. Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room;
 - f. Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution);
 - g. Otherwise lives in housing that has characteristics associated with instability and increased risk of homelessness, as identified in the Consolidated Plan
 - h. A child or youth that qualifies as homeless under the Runaway and Homeless Youth Act or under the McKinney-Vento Homeless Assistance Act
- B. Additional "At-Risk Homeless" definitions identified by ESG Service Providers shall include individuals and families:
 - 1. Sleeping in a place not meant for human habitation such as cars, parks, abandoned buildings, streets, sidewalks, in hospitals or other institutions,
 - 2. Graduates of other programs or shelters, victims of domestic violence
 - 3. With mental health issues and/or substance abuse issues
 - 4. With physical disabilities or chronic health issues including HIV/AIDS
 - 5. With severe housing cost burdens (greater than 50 percent of gross income for housing)

6. Homeless or institutionalized within the past year
7. Who are a young head of household (under 25 with children or pregnant)
8. With current or past involvement with child welfare including foster care
9. With sudden and significant loss of income
10. With sudden increase in utility costs
11. With limited or no work history
12. With lack of high school diploma or skills-based education
13. With lack of childcare or transportation
14. Facing landlord's pending foreclosure
15. Living in substandard housing
16. With recent traumatic life event such as death or abandonment of a spouse or primary care provider or a health issue
17. With significant debt and or credit issues

VI. Standards and Procedures

The County will focus on homelessness prevention and rapid re-housing services with the expenditure of the second allocation of ESG funding. Services will be provided to individuals and families currently in housing who are at risk of becoming homeless and who need temporary assistance (homelessness prevention), as well as individuals and families experiencing homelessness who need temporary assistance in order to obtain housing and retain it (rapid re-housing).

Emphasis will be on services that provide short- and medium-term rental assistance to help homeless people quickly move into permanent housing and achieve stability in that housing. Participants placed in housing shall receive continued assistance and may be transferred to new housing or other programs once lease terms expire.

Through consultations and collaboration as described above in the "Collaboration and Coordination" section, general standards and procedures were established for homeless prevention and rapid re-housing services. These include:

Standard 1

Collaboration among partners will improve.

- The County, relevant city agencies, and service providers will jointly assess short- and long-term homeless needs and establish priorities and will jointly determine gaps based on assessments and resources available
- Homeless service providers and the County will assess what homeless services are currently available by organization to coordinate services
- The County and service providers will collaborate in implementing HUD's new centralized system once in operation

Standard 2

Eligibility requirements and policies will guide the County in making funding decisions.

- Participant eligibility will be consistent with homeless and at-risk homeless definitions provided by HUD for the Consolidated Plan, the Continuum of Care and the County's additions derived from Service Providers at the Charette
- Service providers will accurately qualify individual and families for homeless prevention or rapid re-housing services

Standard 3

Priority services shall address homelessness prevention and rapid re-housing.

- Services shall focus on helping people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness
- Priority shall be given to programs that target rapid re-housing services to people who can stabilize quickly such as individuals or families in need of small assistance such as security deposits
- Priority funding recommendations will consider the track records of current service providers, and focus funding on the most successful program(s), providing an incentive for service providers to implement proven strategies
- Priority services should utilize the dual criteria of assisting those most in need and the most likely to achieve stable subsidized or unsubsidized housing (as compared to targeting a specific demographic); examples include people who are in a shelter, in recovery, have a job, and can be successful after being housed
- Service providers will make available a broad array of financial assistance and supportive services, such as short-term subsidies for rent and utility costs, moving costs, security deposits, last month's rent, mediation for landlord-tenant disputes, legal services, case management, and credit repair
- Service providers may offer life skills counseling such as budgeting, money management, managing a household, resolving conflict, shopping for food, improving nutrition, using transportation, and accessing services. Homelessness prevention or rapid re-housing assistance may be used as a stop gap for people on a fixed income, or people who are not working, to stabilize them until they receive housing vouchers
- Service providers will determine participant cost sharing, length and level of service on a case-by-case basis (consistent with HUD regulations); cost sharing shall be determined through consistently applied case management protocols tied to program goals, participants' budgets, assets, and what they can afford
- Length of service shall depend upon need; financial assistance up to 6 months, case management may be longer term for some participants such as mentally ill addicts who lapse back into lifestyle patterns that caused them to be homeless
- Service providers will consider requiring a savings account or a partial rent payment for participants who are not fully engaged, to keep them in case management
- Service providers will consider creating a revolving security deposit fund utilizing returned security deposits from landlords when a tenant/client assisted through ESG funds moves out of an assisted unit

Standard 4

Assist high-needs homeless through referral to and provision of other programs and services.

- Assist individuals/families with highest risk factors and facing multiple obstacles to access programs and services such as mental health and/or drug and alcohol treatment and job development programs
- Utilize the County's Vulnerability Index as a guide to triage those with greater needs and vulnerabilities and refer them to appropriate programs
- Address public concern over visibly homelessness populations through other programs
- Consider that some individuals/families at or below 30 percent AMI may not be able to sustain permanent housing and refer them to appropriate programs

Standard 5

The County and subrecipients will follow HUD regulations.

- Utilize HUD's program limits with the exception that subrecipients are encouraged to conduct more regular client follow-up assessments (e.g., 3, 6, 12 months)
- Adhere to match requirements in the Interim Rule (24 CFR 576.201). Each of the ESG-funded programs leverages thousands of dollars from private foundations, fundraising activities, and 'in-kind' contributions. Thus, the County anticipates exceeding the dollar-for-dollar match requirement. Match funds will be applied towards rental assistance and case management services.
- Adhere to HUD Regulations (24 CFR 576.103, 104, and 105) for the second allocation serving individuals or families with incomes of 50% or less than AMI for rapid re-housing and 30 percent for prevention:
 - a. Initial consultation to determine eligibility and needs with case manager
 - b. No other housing options available to client
 - c. No financial resources or other support network to obtain or remain in housing
 - d. Assistance cannot exceed 18 months for rental and utility payments
 - e. No participant may receive more than 24 months in a 3 year period
 - f. No more than 6 months of rental arrears (existing housing)
 - g. Rent paid cannot exceed actual rental costs, must be rent reasonable for market area, and a Checklist and Certification are required
 - h. Provide accurate data on income, residency, homelessness for HMIS
 - i. Participants receiving project-based rental assistance must have a lease that is for a period of 1-year, regardless of the length of rental assistance
 - j. Participants receiving rapid re-housing assistance must be re-evaluated at least once every year, prefer every 3 months
 - k. Participants receiving homelessness prevention assistance are required to be re-evaluated at least once every 3 months
 - l. Recipients and service providers must have policies and procedures ensuring client confidentiality (variances for victim Service providers)
 - m. Service providers must provide written descriptions of income verification efforts for the participant's case file; first priority is to obtain written third party verification such as a referral agency, then an oral third party verification and if necessary, a self-declaration; describe if a lower level of documentation is used such as self-assessments

- n. Ensure that a lead-based paint visual assessment was conducted for all units where a homelessness prevention or rapid re-housing -assisted household is living and the household receives assistance (prior to 1978 and if children under 6 lie in the household); Obtain assistance from County staff or a trained expert as needed since assessments can be technical
- o. Document that the unit to be occupied by an homelessness prevention or rapid re-housing-assisted household meets habitability standards

Standard 6

Case management and support services will be strengthened.

- Strong case management is required especially for medium and longer-term clients who require individualized plans, progress reports and exit data. Plans will track efforts to help clients obtain and retain housing (e.g., clients with alcohol and addiction or triply- diagnosed persons such as young parents with children). Assist longer-term clients (over 24 months) to access additional services outside of ESG perimeters.
- Client intake will more efficiently document eligibility by providing information from previous Service providers if at all possible; information can help determine if the client is likely to end up on the streets again
 - a. Case management files must include intake form, proof of homelessness or at-risk of homelessness status, individual case plans and progress reports
 - b. Narratives will be kept in participant files describing how the service provider determined that the household was likely to maintain housing stability with homelessness prevention or rapid re-housing assistance
 - c. Service providers shall maintain exit data regarding client status
- Support services are required for homelessness prevention or rapid re-housing clients to help them strengthen their situation and keep them housed, e.g., provide or refer program participants to parenting classes, employment and training, medical and dental care services provided by other mainstream providers; consider that housing first may not be available for the most vulnerable; continually assess outcomes; and provide services that make a difference in changing negative patterns
- Record-keeping will match homeless program and service requirements and will be consistent for all like services
- Short-term clients who are assisted with homelessness prevention or rapid re-housing funding will be encouraged to report back progress and provide feedback about what worked or could have been improved

VII. Performance Standards and Indicators for Evaluating Outcomes

All recommendations in the Substantial Amendment take into consideration local challenges, other local resources available or lacking, and local housing and economic conditions affecting underserved needs in the community. The County will continually analyze data and patterns of use to assess outcomes and encourage subrecipients to develop additional complementary standards to ensure that the greatest number of homeless individuals and families are served. Performance depends upon the County, subrecipients, and other community partners carrying out the following minimum responsibilities:

A. County Performance Standards

The County will re-evaluate and improve existing performance standards to:

- Align the Consolidated Plan with the Continuum of Care performance standards
- Align the Consolidated Plan and ESG services with the United States Interagency Council on Homelessness' "Opening Doors: The Strategic Plan to End Homelessness". Most specifically, funding priorities for ESG services will support the Opening Doors goal to prevent and end homelessness for families, youth and children in ten years; this is the homeless population most prevalent in Santa Barbara County and the population that can benefit most from homelessness prevention and rapid re-housing services
- Enforce statutory and regulatory standards set out in the ESG Interim Rule
- Strengthen the Continuum of Care program, assess gaps in services and reduce duplication
- Support organizations with successful track records
- Determine appropriate performance measures for homeless prevention vs. rapid re-housing by continually reviewing and applying best practices standards to direct funding
- Assess whether local standards help or hinder how service providers target and design their programs
- Analyze patterns of use, local data, program accomplishments, and monitoring outcomes to evaluate subrecipients, including:
 - a. HMIS will assist providers and the County to record data and design priority programs accordingly
 - b. Assess short- and long-term participant needs using HMIS and the new centralized system once it is provided by HUD
 - c. Assess outcomes according to numbers reportedly staying stabilized in their housing
 - d. Consider resources available to provide assistance, needs data, case management requirements, and track records of service providers to determine the approximate number of people who can be served with this type of assistance
 - e. Assess subrecipients' ability to target those who need the assistance most, including:
 1. Track the number of clients served per month, including short and medium range participants from their initial assessment to when they achieve housing stability
 2. Reduce the number of people living on the streets or emergency shelters;
 3. Shorten the time people spend homeless
 4. Reduce each program participant's housing barriers or housing stability risks
 5. Assess clients' ability to maintain housing stability after six months and one year
 6. Quantify demand for services and the ability to track outcomes
 7. Leverage other funds (e.g., HOME funds for TBRA)
 8. Work with housing authorities to leverage loans or grants for security deposits
 9. Determine on-going impacts of homeless prevention and rapid re-housing programs
 10. Assess other resources that might be available to address shortfalls/gaps;
 - f. Improve County monitoring of subrecipients, including:
 1. Review and update ESG monitoring standards and procedures to ensure that established standards and procedures will allow recipient to check for compliance with new requirements

2. Address levels of County staffing needed to conduct monitoring
3. Monitor service providers at least twice per year and review grant activities monthly; conduct risk assessments and on-site or desk audits
- g. Comply with Federal reporting requirements, including:
 1. Action Plan: Comply with revised requirements for preparing and submitting the Action Plan
 2. Next Consolidated Plan: All housing and homeless needs assessments, housing market analyses, and strategic plans will comply with all of the revised requirements
 3. CAPER: Report on ESG in the substantial amendment to the 2011 Annual Action Plan and future Annual Action Plans using the new ESG specific reporting requirements under 24 CFR 91.520(g)
 4. County will report annually using the new homelessness reporting requirements

B. Subrecipient Performance Standards

Subrecipients' success will be measured according to their ability to reduce the number of homeless, to reduce the length of time a person/family is homeless, and the ability to meet quantifiable measures and timelines. Subrecipients will be expected to:

Demonstrate Collaboration:

- Coordinate with mainstream and other services and partners to help clients stay housed
- Collaborate with Continuum of Care partners in the development of long-term and emergency solutions for assisting the homeless population
- Conduct outreach to other social services agencies who would make referrals to landlords, housing authorities and provide other needed services
- Standardize intake forms to document eligibility, goals, progress reports, exit data; encourage written third party verification

Track Performance:

- Develop and maintain performance standards
- Identify key indicators that help determine success upfront such as client readiness for services, medical clearances and access to medications, ability to function in independent living situations vs. emergency requirements which have different indicators and require provision of different services (housing first vs. counseling and support services first)
- Project the number of persons or households who will exit or avoid homelessness, the number of persons or households assisted from emergency shelters/streets into permanent housing and the number of persons or households assisted with rapid re-housing that remain stabilized in housing after services are provided
- Track the length of time between the onset of homelessness and re-housing
- Demonstrate a commitment to best practices, recognizing that the overall goal is to achieve stability in permanent housing, irrespective of the path to it
- Have written policies and procedures in place to assure client security and confidentiality of personal information
- Develop guidelines regarding participant cost-sharing and how lengths of assistance are determined and applied in a consistent fashion

- Assure that cash assistance and heavy case management is applied to clients that clearly meet eligibility requirements
- Provide the following types of housing assistance listed below in priority order:
 - a. Deposits (rent/utilities); application fees
 - b. Utility payments
 - c. Motel/hotel vouchers in extreme cases where participants are awaiting identified housing that isn't ready, or in areas where there are no shelters, or for sick unsheltered homeless persons
 - d. Moving assistance
- Provide on-going risk analysis to determine physical, social, medical, education and other participant needs
- Demonstrate agreement between the client and service provider to make a year-long commitment for data tracking to evaluate and determine outcomes
- Demonstrate strong case management and recordkeeping:
 - a. Document all consultations with case manager or authorized representative who determined eligibility and need; document qualifications, services and progress according to the homelessness prevention or rapid re-housing criteria and regulations
 - b. Extensive intake assessments shall determine needs for housing, medical screening, capacity for independent living, emergency needs, cash assistance needs, combination of needs, and client motivation
 - c. Develop benchmarks to measure both long-term and short-term housing assistance and case management considering the number of times of assistance, length of assistance and type of services provided
 - d. Track success such as the number of persons or households prevented from becoming homeless
 - e. Target persons with critical needs for rapid re-housing and diverting them from shelters, e.g., stabilize persons on the brink of homelessness or who just fell into homelessness because of the economic downturn or due to their inability to come up with small gap resources such as housing deposits
- Adhere to cost reasonableness requirements (i.e., eligible activities, appropriate salaries, administration caps)
- Adhere to other federal requirements (i.e., drug-free workplace, lobbying restrictions)

VIII. Outcome-focused Evaluation Tools for County and Subrecipients

The County and subrecipients will use the following outcome-focused evaluation tools:

- Homeless Management and Information System (HMIS): The County as the official HMIS administrator will provide training and technical assistance to subrecipients. The result will be improved data collection, performance measurements and outcomes
- HUD's Centralized Coordinated Assessment system once made available
- The County's monitoring checklists in compliance with ESG and the HEARTH Act

IX. Funding Priorities and 2012 NOFA Program Recommendations

A. Expenditure Limits

The total amount of the County's first and second FY2011 Allocations that can be expended on street outreach and emergency shelter activities is limited. Per the Interim rule, expenditures on such activities cannot exceed the greater of 60 percent of the full FY2011 Allocation or the total amount of FY2010 funds committed to homeless assistance activities. For the County's FY2010 Allocation (Table 1), funds were allocated to emergency shelters and street outreach and administration ; no funds were allocated to homelessness prevention activities.

As the amount of FY2010 funds committed to homeless assistance activities exceeds 60 percent of the FY2011 Allocation, the amount of FY2010 funds committed to such activities will be the FY2011 expenditure limit. All of the first allocation of FY2011 ESG funds (Table 2) was awarded to emergency shelters, with the exception of administrative activities. Therefore, the second allocation of funds (Table 3) is dedicated to homelessness prevention and rapid re-housing services, as required by the Interim Rule.

Table 1

FY2010 Grant Fund Commitments	
Activity Type	Obligated Amount
Homeless Assistance (Shelter/Outreach)	\$ 84,327.00
Homelessness Prevention	\$ 0.00
Administrative Activities	\$ 4,438.00
Total FY2010 Award	\$ 88,765.00

Table 2

FY2011 First Allocation Grant Fund Commitments	
Activity Type	Obligated Amount
Homeless Assistance (Shelter/Outreach)	\$ 84,327.00
Homelessness Prevention	\$ 0.00
Administrative Activities	\$ 4,148.00
Total FY2011 First Allocation Award	\$ 88,475.00

Table 3

FY2011 Second Allocation Grant Fund Commitments	
Component/Activity Type	Obligated Amount
Emergency Shelter	\$ 0.00
Street Outreach	\$ 0.00
Homeless Management Information System (HMIS)	\$ 0.00
Homelessness Prevention	\$ 18,968.00
Rapid Re-housing	\$ 24,579.00
Administrative Activities	\$ 6,220.00
Total FY2011 Second Allocation Award	\$ 49,767.00

B. 2012 NOFA Program Recommendations

Since the FY2011 Second Allocation and FY2012 Allocation cycles are concurrent, the grant application and review processes were combined. All ESG applications were reviewed for basic eligibility by CSD staff, followed by in-person interviews of program personnel by the Allocations Committee of the County Human Services Commission. The interviews were open to the public, as were the deliberations of the Committee. In order to receive a final reservation of funds, all projects must be approved by the County Board of Supervisors for inclusion in the Substantial Amendment and in the 2012 Action Plan. The recommendations of the County of Santa Barbara Human Services Commission to the County Board of Supervisors are shown in the following charts:

Table 4

FY2011 Second Allocation Grant Fund Recommendations			
Agency	Program	Component(s)	Amount
Good Samaritan Shelter	Countywide Rapid Re-housing	Rapid Re-housing	\$ 19,236.00
Legal Aid Foundation of Santa Barbara County	Homeless Prevention	Homelessness Prevention	\$ 5,076.00
Santa Ynez Valley People Helping People	Emergency Assistance Program (EAP)	Homelessness Prevention, Rapid Re-housing	\$ 8,549.00
Transition House	Homelessness Prevention Program	Homelessness Prevention	\$ 10,686.00
County CSD	Administration	Administration	\$ 6,220.00
Total			\$ 49,767.00

Table 5

FY2012 Grant Fund Recommendations			
Agency	Program	Component(s)	Amount
Domestic Violence Solutions for Santa Barbara County	Santa Barbara Emergency Shelter	Emergency Shelter	\$ 6,245.00
Good Samaritan Shelter	Countywide Rapid Re-housing	Rapid Re-housing	\$ 25,764.00
Good Samaritan Shelter	Emergency Shelter Services	Emergency Shelter	\$ 75,000.00
Legal Aid Foundation of Santa Barbara County	Homeless Prevention	Homelessness Prevention	\$ 6,798.00
Santa Ynez Valley People Helping People	Emergency Assistance Program (EAP)	Homelessness Prevention, Rapid Re-housing	\$ 11,451.00
Transition House	Homelessness Prevention Program	Homelessness Prevention	\$ 14,314.00
WillBridge of Santa Barbara, Inc.	WillBridge of Santa Barbara, Inc.	Emergency Shelter	\$ 6,245.00
County CSD	Administration	Administration	\$ 11,822.00
Total			\$ 157,639.00

C. Funding Priorities

CSD staff sought input regarding the relative need for homeless prevention or rapid re-housing at the Charette, through one-on-one discussion with community experts who understand the unique needs of Santa Barbara County, and through ESG applicant interviews. All of these sources indicated that both homelessness prevention and rapid re-housing have been effective through HPRP funding, and no strong preference for one of the two approaches emerged. Homelessness prevention has been successful to keep individuals and families housed who were at imminent risk of becoming homeless; providers of prevention services concurred that ongoing case management that includes life-skill training was an essential component for helping program participants to maintain housing stability. Rapid re-housing providers also reported that ongoing case management is important for establishing housing stability.

Homelessness prevention efforts will be targeted to families that are identified by Family Resource Centers as individuals and families who seek help from local nonprofits and/or from the Legal Aid Foundation of Santa Barbara County. Rapid re-housing efforts will be targeted to individuals and families who have fallen into homelessness and are residing in temporary shelters.

The County has identified a number of obstacles to successfully address underserved needs in the community. Housing costs in parts of Santa Barbara County are among the highest in the nation and there is an insufficient supply of affordable rental units. Other obstacles include insufficient services available to meet the specific needs of some Participants such as mental health and substance abuse treatment. Other Participant obstacles include:

- Negative credit reports
- Evictions from rental housing due to foreclosure against landlord
- Limited financial resources (including administrative costs that take away from program delivery)

Given the factors listed above as well as the demonstrated need for both homelessness prevention and rapid re-housing countywide, the following activities were recommended for ESG funding:

Good Samaritan Shelter COUNTYWIDE RAPID RE-HOUSING	
Priority Need:	Provide funding for essential services and programs that provide needed resources for homeless persons
Description:	Good Samaritan Shelter will work in partnership with Casa Esperanza Homeless Center to provide direct assistance and case management to 17 homeless households.
Performance Objective:	Provide Decent Affordable Housing
Performance Outcome:	Affordability
Start Date:	Upon grant execution
Completion Date:	12 months from grant execution date
ESG Funding:	\$19,236.00 FY2011 Second Allocation \$25,764.00 FY2012 Allocation
Performance Indicators:	<ul style="list-style-type: none"> ▪ 75% of rapid re-housing clients will remain in permanent housing after six months ▪ 100% of rapid re-housing clients will receive case management and budgeting skills prior to receiving rapid re-housing assistance
Projected Accomplishments:	<ul style="list-style-type: none"> ▪ 13 rapid re-housing clients will remain in permanent housing after six months ▪ 17 rapid re-housing clients will receive case management and budgeting skills prior to receiving rapid re-housing assistance

Legal Aid Foundation of Santa Barbara County
HOMELESS PREVENTION

Priority Need:	Provide funding for essential services and programs that provide needed resources for homeless persons
Description:	Legal Aid Foundation of Santa Barbara County will provide legal services, including but not limited to advice, counsel, negotiation, mediation, representation, case management, and credit counseling to 35 households at risk of becoming homeless.
Performance Objective:	Provide Decent Affordable Housing
Performance Outcome:	Affordability
Start Date:	Upon grant execution
Completion Date:	12 months from grant execution date
ESG Funding:	\$5,076.00 FY2011 Second Allocation \$6,798.00 FY2012 Allocation
Performance Indicators:	<ul style="list-style-type: none"> ▪ 100% of individuals and/or families will be prevented from becoming homeless ▪ 75% of clients served will be satisfied as seen through satisfaction surveys that are mailed to each client at the conclusion of services ▪ 100% of clients will feel empowered to better handle housing issues on their own because they have been educated on their legal rights as tenants
Projected Accomplishments:	<ul style="list-style-type: none"> ▪ 35 individuals and/or families will be prevented from becoming homeless ▪ 26 clients served will be satisfied as seen through satisfaction surveys that are mailed to each client at the conclusion of services ▪ 35 clients will feel empowered to better handle housing issues on their own because they have been educated on their legal rights as tenants

Santa Ynez Valley People Helping People
EMERGENCY ASSISTANCE PROGRAM

Priority Need:	Provide funding for essential services and programs that provide needed resources for homeless persons
Description:	Santa Ynez Valley People Helping People will provide services and direct assistance to 6 homeless persons and 13 persons at risk of homelessness and help them regain housing stability.
Performance Objective:	Provide Decent Affordable Housing
Performance Outcome:	Affordability
Start Date:	Upon grant execution
Completion Date:	12 months from grant execution date
ESG Funding:	\$8,549.00 FY2011 Second Allocation \$11,451.00 FY2012 Allocation
Performance Indicators:	<ul style="list-style-type: none"> ▪ 90% of persons assisted through Homelessness Prevention activities will be able to maintain housing for more than three months ▪ 75% of all persons served with Homelessness Prevention and Rapid Re-housing assistance will be linked to at least one other resource that will benefit the client ▪ 75% of persons who receive Rapid Re-housing assistance will not become homeless again for three months
Projected Accomplishments:	<ul style="list-style-type: none"> ▪ 12 persons assisted through Homelessness Prevention activities will be able to maintain housing for more than three months ▪ 14 persons served with Homelessness Prevention and Rapid Re-housing assistance will be linked to at least one other resource that will benefit the client ▪ 5 persons who received Rapid Re-housing assistance will not become homeless again for three months

Transition House
HOMELESSNESS PREVENTION PROGRAM

Priority Need:	Provide funding for essential services and programs that provide needed resources for homeless persons
Description:	Transition House will provide emergency rental assistance with case management for up to 9 families facing immediate eviction.
Performance Objective:	Provide Decent Affordable Housing
Performance Outcome:	Affordability
Start Date:	Upon grant execution
Completion Date:	12 months from grant execution date
ESG Funding:	\$10,686.00 FY2011 Second Allocation \$14,314.00 FY2012 Allocation
Performance Indicators:	<ul style="list-style-type: none"> ▪ 90% of households that receive rental assistance will retain their housing for at least one year ▪ 90% of households receiving rental assistance will learn household financial management techniques
Projected Accomplishments:	<ul style="list-style-type: none"> ▪ 8 households receiving rental assistance will retain their housing for at least one year ▪ 8 households receiving rental assistance will learn household financial management techniques

FY 2011 Detailed Budget Table					
First Allocation	\$88,475.00	FY 2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations			
Second Allocation	\$49,767.00				
Grant Amount	\$138,242.00				
Total Administration	\$10,368.00				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$84,327.00	\$0.00		\$84,327.00
	<i>Rehab/Conversion</i>	\$0.00	\$0.00		\$0.00
	<i>Operations</i>	\$72,000.00	\$0.00		\$72,000.00
	<i>Essential Services</i>	\$12,327.00	\$0.00		\$12,327.00
	Homelessness Prevention	\$0.00	\$0.00		\$0.00
	Administration	\$4,148.00	\$0.00		\$4,148.00
	Emergency Shelter Grants Subtotal	\$88,475.00	\$0.00		\$88,475.00
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	\$0.00
	Rapid Re-housing		\$0.00	\$22,536.00	\$24,579.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$20,536.00	\$8,592.00
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$2,000.00	\$15,987.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Homelessness Prevention		\$0.00	\$21,011.00	\$18,968.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$18,011.00	\$10,120.00
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$3,000.00	\$8,848.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Administration			\$6,220.00	\$6,220.00
	Emergency Solutions Grants Subtotal		\$0.00	\$49,767.00	\$49,767.00
Total Grant Amount: \$88,475.00 + \$49,767.00 =					\$138,242.00

Appendix I

Charette Sign-in Sheets

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