

## Substantial Amendment to Vermont's 2011 Consolidated Plan Annual Action Plan

### **Implementation of the Emergency Solutions Grant (ESG)**

#### **Overview**

The Emergency Solutions Grants program (ESG) is administered by the state Office of Economic Opportunity (OEO) to help nonprofit organizations, including community and faith-based organizations; provide emergency overnight and day shelter; offer supportive services for 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 Grants program. Among other changes, the HEARTH act amends the program name to *Emergency Solutions*; 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).

#### **Coordination and Consultation**

The State OEO continues to coordinate with partners in the Vermont Agency of Human Services (AHS), Chittenden County and Balance of State Continuum of Care, and external stakeholders to ensure that ESG's enhanced homelessness prevention and re-housing role is part of an integrated, statewide strategy to ending homelessness and improving housing and stability outcomes for families and individuals. While Vermont benefits from its small scale which helps to facilitate many informal working relationships between stakeholders, the partners have taken the following steps in anticipation of the HEARTH Act to better reflect and formalize their strong level of coordination.

- Staff from the Vermont State Housing Authority (C.o.C. Lead Agency and largest C.o.C. Grantee recipient for the Vermont Balance of State Continuum of Care) and the State Office of Economic Opportunity (Emergency Shelter/Solutions Grantee for Vermont) meet with the Consolidated Plan Advisory group.
- In state fiscal year 2012, the OEO Emergency Shelter/Solutions Grant Administrator joined the steering committee of the Vermont Coalition to End Homelessness, the Primary Decision-Making Group for the Vermont Balance of State Continuum of Care.

- The Vermont Office of Economic Opportunity and Vermont State Housing Authority have begun sharing more sub-recipient/sponsor information relating to the development of performance measures and actual outcomes for both the ESG, Supportive Housing Program (SHP), and Shelter Plus Care Program. These efforts will continue within the entire Vermont Balance of State Continuum of Care, as well as the Burlington/Chittenden C.o.C. over the coming year as final, year-end, ESG program data becomes available in the summer of 2012.
- The Vermont State Housing Authority has invited the Emergency Shelter/Solutions Grantee to participate in a Project Review Committee to evaluate applications for recent Shelter Plus Care Program Bonus projects.
- All parties, as well as staff from Vermont's Agency of Commerce and Community Development (CDBG Grantee) are represented on the Vermont Council on Homelessness.
- Both the Vermont Balance of State Continuum of Care and Burlington/Chittenden County Continuum of Care are currently receiving assistance from the Technical Assistance Collaborative (TAC) to ensure Vermont is prepared for complete HEARTH implementation.
- Vermont's CoC's were included in discussions regarding how to allocate ESG funds for eligible activities through:
  1. Discussions at the Balance of State and Chittenden Continuum of Care.
  2. Presentation at the Vermont Council on Homelessness (VCH).
  3. Presentations at public hearings.

Both the VCH meeting and first public hearing were well attended by CoC members. Vermont's decision to dedicate ESG phase II funds towards prevention and rapid re-housing has been popular with CoC members because both activities include case management as an eligible sub-activity.

- Vermont developed new performance measures for ESG in late 2010/early 2011 which went into effect July 1, 2011. Involvement was primarily through discussions at the Vermont Council on Homelessness, meetings with the BOS CoC lead agency, and in small groups with service providers serving sub-populations such as victims of domestic violence or homeless youth. As a result, Vermont did not need to do as intensive an outreach process with the CoCs leading up to this year. As the OEO made sub-grants to individual providers, some performance measures had to be fine-tuned based on the eligible ESG activity funded and sub-population(s) targeted. Based on preliminary results, we intend to retain these ESG measures in the program year beginning July 1, 2012.

- Vermont has not requested that any of the additional Phase II ESG funding be used for HMIS. The primary policy group for HMIS issues in Vermont is the HMIS Data Quality Management Group. The Chittenden CoC also has a data group. Because our two Continua of Care use different HMIS software, our current HMIS priority is pursuing a common statewide system, or a bridge, that will allow unduplicated statewide data to be analyzed. Members from both continua's data committees and a representative from AHS are now meeting with a consultant to pursue this option of a common system. Progress made by that group will allow us to have a more consistent, statewide approach to HMIS and data. The OEO and AHS have heard that some members of the HMIS Data Quality Management Group would like more ESG funding to be spent on HMIS. That is still an option based on future recommendations coming out of the inter-continua group now meeting.

### **Match Requirement**

The Vermont legislature allocates \$792,000 in state general funds to be used for "homeless shelter and services." These funds, also administered by the Office of Economic Opportunity, are added to Vermont's ESG program, fulfilling the ESG match requirement.

### **Proposed Activities and Overall Budget**

Vermont does not intend to reprogram any portion of the initial (phase I) FFY 2011 Emergency Shelter Grant award. Phase II Emergency *Solutions* Grant funds in the amount of \$205,440 will be allocated to Rapid Re-housing; Homelessness Prevention; and Administration of the ESG program.

(For a detailed budget of planned activities and funding levels accounting for entire first and second allocations, please refer to the Budget Table in the appendix.)

### **Proposed New Activities for PHASE II ESG funding**

#### **1. Rapid Re-housing - Housing Relocation and Stabilization Services.**

Corresponding priority needs from Annual Action Plan:

1. Reaching out to homeless persons
2. Helping homeless persons transition to permanent housing

Concise description of activity:

ESG Rapid Re-housing funds will be used by sub-grantee non-profit providers to provide Housing relocation and stabilization services to persons who have recently become homeless, to move as quickly as possible into permanent housing and achieve stability in that housing. The state has set a goal of 28 days in which to stabilize and re-house the recently homeless.

Eligible rapid re-housing financial assistance in Vermont will be limited to: security deposits, last month's rent, utility deposits and payments, and moving costs.

Eligible rapid re-housing services in Vermont will be limited to: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

After operating the Rapid Re-Housing components for 12 months, Vermont expects to have baseline data and be better able to predict the number of each sub-population to be served.

#### Financial Assistance

- Moving costs
- Security deposit / last month's rent
- Utility deposit / Utility payments

#### Services

- Housing stability case management (both before and/or after lease-up)
- Housing search / placement
- Credit repair / budgeting / money management
- Landlord-Tenant Mediation

Corresponding standard objective and outcome categories:

Decent Housing / Sustainability (DH3)

Start date and completion date:

Emergency Solutions Grant FFY 2011 Phase II funding must be fully expended within 24 months from the date HUD signs the amendment. At this time, the State of Vermont anticipates that at least 75% of phase II ESG funds will be expended in SFY 2013 (July 1, 2012 through June 30, 2013) and 100% of funds will be expended by March 1, 2014.

## **2. Homelessness Prevention - Housing Relocation and Stabilization Services.**

Corresponding priority needs from recipient's Annual Action Plan:

1. Helping low income families avoid becoming homeless

Concise description of activity:

ESG Homelessness Prevention financial assistance will be limited to: rental arrears, security deposits, last month's rent, utility deposits and payments, moving costs.

ESG Homeless Prevention services will be limited to: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

Homelessness Prevention assistance will be provided to all eligible sub-populations (DV, chronic, families, individuals, youth, veterans).

### Financial Assistance

- Rental Arrears
- Moving costs
- Security deposit / last month's rent
- Utility deposit / Utility payments

### Services

- Housing stability case management (both before and/or after lease-up)
- Housing search / placement
- Credit repair / budgeting / money management
- Landlord-Tenant Mediation

Corresponding standard objective and outcome categories:

Decent Housing / Sustainability (DH3)

Start date and completion date:

Emergency Solutions Grant FFY 2011 Phase II funding must be fully expended within 24 months from the date HUD signs the amendment. At this time, the State of Vermont anticipates that at least 75% of phase II ESG funds will be expended in SFY 2013 (July 1, 2012 through June 30, 2013) and 100% of funds will be expended by March 1, 2014.

## **Rationale for Priorities**

Two of the largest obstacles to preventing and ending homelessness in Vermont are regional shortages of units affordable to persons at or below 30% of AMI, and a shortage of intensive housing case management with an ability to provide adequate follow-up after a household is stabilized or re-housed. Vermont has taken steps to increase the number of subsidies through the use of state dollars, but in areas such as the Chittenden MSA, rents are high and vacancy rates so low that tenant-based subsidies can be a challenge to utilize. In other regions, the affordability crisis is less pressing, but the shortage of strong case management that stays with the person can lead to recidivism back into homelessness. Vermont is engaged on many fronts in addressing both of these issues.

Vermont has chosen to prioritize phase II ESG funds for Rapid Re-housing. The decision to allocate \$135,624 in this category is based on an analysis of data and lessons learned from HUD's HPRP program; reports released by policy experts such as the National Alliance to End Homelessness; and from an acknowledgement that homelessness is inherently traumatic for families and individuals and that reducing the duration of homelessness for families and individuals is the most humane, efficient and effective strategy for reducing homelessness, preventing chronic homelessness, and avoiding more costly interventions in the future.

Vermont has chosen to allocate a smaller portion, \$45,208, to homelessness prevention because 1) there are state funds already targeted to this activity in the current program year through the State's \$1.6M Housing Replacement Funds (HRF) program; and 2) because of the inherent challenge in quantifying what prevention assistance is the determinant factor in preventing homelessness.

In both categories, Vermont has elected to allocate funding to Housing Relocation and Stabilization Services. This helps to fill a critical gap in case management, and provides maximum flexibility for local sub-recipient providers to respond to the individual needs of homeless households with funding for activities such as rental assistance, security deposits and housing search.

## **Challenges**

While Vermont recognizes the urgent need for more long-term rental assistance through programs such as HUD's section 8 and USDA Rural Development, it has not chosen to dedicate phase II ESG funds to medium-term rental subsidy assistance because: 1) Vermont is in the process of adding over 100 new subsidies/vouchers in rental markets with very low vacancy rates; and 2) Policy papers suggest that, in the case of HPRP, small amounts of assistance provided to a larger group of people may be more effective in both prevention and re-housing.

*(For a detailed budget of planned activities and funding levels accounting for entire first and second allocations, please refer to the Budget Table in appendix I.)*

## Standards for Provision of ESG Assistance

Vermont has developed the following standards for the provision of HUD Emergency Solutions Grant assistance and expects to continue to refine and enhance these standards in future Consolidated Plans and Annual Action Plans over the next few years based on outcomes data and experience shared by providers, administrators and beneficiaries. Any of the written standards below which are not contained in the State's RFP will be communicated to funded sub-recipients in a memorandum to accompany written grant documents.

### ***A. Evaluation of individuals' and families' eligibility for assistance under the Emergency Solutions Grant (ESG).***

The policies and procedures of providers funded under HUD ESG shall be consistent with the definitions of homeless and at risk of homelessness in 24 CFR 576.2 (included here as appendices I and II) and the recordkeeping requirements in 24 CFR 576.500(b), (c), (d), and (e), specifically:

Program participant eligibility for ESG Homelessness Prevention activity is limited to families and individuals who meet the criteria under the "at risk of homelessness" definition (included here as appendix III), or who meet the criteria in paragraph (2), (3), or (4) of the HUD Definition of Homelessness (included here as appendix II) and have an annual income below 30 percent of median family income for the county, as determined by HUD.

Program participant eligibility for ESG Rapid Re-Housing activity is limited to families and individuals who meet the criteria under paragraph (1) of the HUD Definition of Homelessness (included here as appendix II), or who meet the criteria under paragraph (4) and live in an emergency shelter or other place described in paragraph (1) of the definition.

### ***B. Coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.***

1. At the local level, emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers are coordinated through Vermont's smaller, regional, continua of care. All have developed task forces, working groups, or inter-agency teams to ensure coordination of services for homeless and at-risk households.

2. The current ESG Request For Proposal requires detailed responses from applicants on coordination with partners in the continuum and AHS district. This factors into allocation decisions and will aid Vermont in developing further systems and procedures to achieve maximum efficiency and effectiveness among ESG

providers in the continuum. All ESG applicants must provide data on their agency's demonstrated ability to reduce the incidence and duration of homelessness in their AHS district or local continuum of care; prevent homelessness or re-house the homeless; provide effective housing stability case management services; or connect homeless clients with mainstream benefits. All ESG applicants must:

- A. Identify the local Continuum of Care and AHS District(s) served.
- B. Describe their agency's role and participation in the local Continuum of Care.
- C. Evidence the need for the assistance and its position within the District or Continuum.
- D. Describe how the proposed activities fill a gap or address a priority of the Continuum.
- E. List any other agencies in the District or Continuum providing similar services to those for which they are applying?
- F. Grantees applying for essential services funding for case management must include additional detail on what will be provided; what model or approach will be used; estimated case loads; qualifications or training of housing support workers / case managers; the level of aftercare case management to be provided; how leads, coordinators or teams will be established; and how this activity will be coordinated with other local providers in the AHS District or local Continuum of Care.
- G. Grantees applying for direct service funding for prevention or rapid re-housing must include additional detail on what will be provided; how eligibility will be determined and documented; how gaps and duplication will be avoided; how staff will provide follow-up; and how this activity will be coordinated with other local providers in the AHS District or local Continuum of Care.

3. Providers funded under the Street Outreach activity will provide services to all unsheltered persons in the service territory that desire to be engaged and provided services. When able, outreach workers shall target services and resources to those with pronounced mental and/or physical health issues, so as to improve their access to resources that will improve the clients' safety and wellbeing. Outreach activities will be targeted to areas which show a significant share of unsheltered homeless as evidenced in the annual Point in Time count.

4. Vermont has received training and technical assistance to support SOAR activities to assist homeless persons with disabilities in attaining mainstream benefits such as SSI and SSDI. ESG providers will collaborate with local SOAR teams to maximize the effectiveness of these efforts.



**Housing Case Management:** Sub-recipients using ESG funding to fund Housing Case Management activities must understand and agree to the following special guidance.

### ***Clarifying Housing Case Management vs. Intake/Screening***

While acknowledging that case management should remain flexible to best serve the individual needs of households, the following defines basic expectations as to what is provided. This is preceded by a definition of Intake/Screening, another essential function for programs serving the homeless.

**Intake/Screening:** To provide coordination at the program or community level; and direct financial assistance where appropriate.

- Record basic household information to determine immediate need, and eligibility for other assistance.
- Assess if a household's needs can be met with financial assistance alone (such as back rent, mortgage arrearage, security deposit), or if more intensive supports are required.
- Provide financial assistance where appropriate.
- Determine what initial referral may be appropriate (case management, shelter, etc.).
- Follow-up on initial referral to prevent a household from "falling through the cracks."

**Housing Case Management:** To provide coordination for the household; to provide more intensive interaction and services for clients deemed unlikely to resolve their housing crisis with short-term financial assistance alone.

- Work closely with the household to acquire and maintain stable housing which is affordable to them.
- Determine (in consultation with household and other community partners, if applicable) who shall be the lead case manager for the household.
- Work with participants to develop a housing plan, set goals, and help participants stay on course.
- Employ best practices to help the household identify its strengths and opportunities, as well as underlying issues which may have led to homelessness, or could undermine success if not addressed.
- Provide information and encouragement for the household (or members of the household) to avail themselves of other appropriate services or take appropriate action to address barriers.
- Maintain a relationship with household, identifying the appropriate level of support without creating over-dependence. This includes providing -- when appropriate -- follow-up case management for higher-risk families after they have moved into permanent housing.

- ***C. Determining and prioritizing which eligible families and individuals will receive homelessness prevention and rapid re-housing assistance.***

### **Homelessness Prevention:**

Program participant eligibility for ESG Homelessness Prevention activity is limited to families and individuals who meet the criteria under the “at risk of homelessness” definition (included here as appendix III), or who meet the criteria in paragraph (2), (3), or (4) of the HUD Definition of Homelessness (included here as appendix II) and have an annual income below 30 percent of median family income for the county, as determined by HUD.

To provide effective services and assistance to as many households at-risk of homelessness as possible, priority will be given to those households for whom it can be determined they would become homeless but for this assistance.

Non-Profit sub-recipients providing such assistance must document and maintain household income information and proof that the household was at risk of homelessness at the time of assistance.

### **Rapid Re-Housing:**

Program participant eligibility for ESG Rapid Re-Housing activity is limited to families and individuals who meet the criteria under paragraph (1) of the HUD Definition of Homelessness (included here as appendix II), or who meet the criteria under paragraph (4) and live in an emergency shelter or other place described in paragraph (1) of the definition.

To provide effective services and assistance to as many homeless families as possible, including those with multiple housing barriers, priority will be given to those persons for whom it can be determined they would likely remain homeless but for this assistance.

Non-Profit sub-recipients providing rapid re-housing assistance must document that the household met the criteria of homelessness at the time of assistance.

### **General Provisions:**

Prioritization of eligible families for rapid re-housing and homelessness prevention services will be determined by the local non-profit ESG sub-recipient and/or the local task force or inter-agency team, using a risk-based assessment at the time of initial program intake and screening. Among eligible ESG recipients, Vermont has not chosen to prioritize sub-populations.

While the ability to sustain housing is an ESG program goal and performance measure, it will not be interpreted as a threshold requirement

No financial assistance may be provided to a household for a purpose and time period supported by another public source.

***D. Determining what percentage, or amount, of rent and utilities costs each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.***

Determining the amount of assistance for individual households will be done by the local non-profit ESG sub-recipients and/or the local task force or inter-agency team within the guidelines provided below. Sub-recipients may need to modify their level of assistance below the maximums provided in this document based on availability of ESG funds, or ability to leverage other state, federal or private assistance funding for clients. Maximum limits on assistance appear in section F, below.

***E. Determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.***

Vermont has elected not to use ESG funding for medium-term rental subsidy assistance. Short-term rental assistance provided will be in the form of one-time payments to remedy rental arrears or provide assistance with security deposits at the time of lease-up.

***F. 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 re-housing assistance that each program participant may receive, such as the 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.***

Maximum Limits of ESG financial Assistance

Payments for rental arrears through ESG may not exceed the value of 3 months' rent.

Delinquent utility payments for renters using ESG may not exceed the value of 2 months charges.

Payments for security deposits through ESG funds may not exceed the value of 2 months' rent. The sub-recipient must have a procedure for recouping deposits.

While ESG-funded hotel or motel stays are not capped, any sub-recipients approved to provide such assistance will be evaluated for their ability to keep average ESG-funded motel stays below 5 days.

No participant may receive more than 6 months of ESG financial assistance in a 3-year period.

No financial assistance may be provided to a household for a purpose and time period supported by another public source.

## **Process for Making Sub-Awards (for all ESG funding – phases I and II)**

One or more grants will be awarded by the OEO to Vermont municipalities, or, with municipal approval, Vermont nonprofits whose purpose is to shelter, serve, and re-house the homeless. Applications for ESG funding will be evaluated by the Office of Economic Opportunity in concert with the Agency of Human Services Secretary's Office. Part of the selection process may involve a site visit of the finalists at which time documentation listed in the application will be reviewed. Eligible applicants are municipalities and approved nonprofits including community and faith-based organizations that;

1. Certify that the assisted property will be maintained as an Emergency Shelter for at least:
  - 10 years if grant is used for major renovation or conversion of building;
  - 3 years if grant is used for rehab other than major renovation or conversion;
  - the period of funded assistance provided that the assistance is not rehabilitation or renovation, and
2. Provide evidence of a match or request relief for the match requirement in the application. (*The State of Vermont has appropriated state general funds for homeless shelters and services which fulfill this match requirement as described above.*)

### Selection of applicants for funding will be made based on the following:

- Meeting of criteria as outlined in this document and detailed in the Request for Proposal (RFP).
- The applicant's history of providing effective shelter or prevention services to the homeless, and of successfully operating performance-based grant-funded programs.
- The applicant's effective coordination with organizations in their local "continuum of care," to address identified gaps in services for the homeless and improve outcomes for participants.
- If the applicant is requesting ESG Operations funding: Assurance that funds will preserve or support existing shelter bed capacity.
- If applicant is requesting ESG Social Services, Rapid Re-Housing or Prevention funding: The applicant's ability to transition homeless participants or shelter residents to permanent or transitional housing, and/or prevent homelessness for families and individuals who are at risk.
- New applicants, and applicants who have recently relocated their operations to another municipality, must submit a completed Certification of Local Government Approval with their application.

Grant funds may not be used for the following:

- Acquisition/Mortgage costs;
- Rehabilitation services such as preparation of work specifications, loan processing or inspections.
- Renovation, rehabilitation or conversion of buildings owned by primarily religious organizations or entities unless the structure being renovated has been leased to a wholly secular organization.

Additional guidance on eligible and ineligible uses of ESG funds are contained in the Department of Housing and Urban Development's ESG program guidelines, and in grant agreements between the state of Vermont and its sub-recipients.

**Homeless Participation Requirement**

N/A. The Grantee is a State and not subject to § 576.405(a).

**Performance Standards**

Beyond traditional output measures -- such as the number of persons in emergency shelter, the number of shelter bed nights provided, or the number of households receiving homelessness prevention assistance -- the OEO and Agency of Human Services have adopted performance-based contracting and the following outcome measures, indicators and targets, consistent with the goal of ending homelessness. Not all ESG sub-recipients will report on all measures. Outcome performance measures are tailored to the category of ESG activity for which funding is awarded, as shown below:

**A. Emergency Shelter Operations**

- *Sub-recipients receiving ESG Operations funds will be paid on a pro-rata basis for the nights in the period that the shelter facilities are open, staffed, insured, clear of safety violations, and available to shelter the homeless.*
- *At least 90% of shelter households (individuals or families) will have an initial meeting with a case manager within 3 days of entering the program.*
- *To establish baseline data, Sub-recipients will report on the number of new shelter residents, the number of residents exiting the program, and the average length of stay.*

## **B. Homelessness Prevention and Rapid Re-Housing**

- *At least 70% of households will have their housing stabilized or be safely re-housed within 28 days. **AND** 70% of the above households will continue to be in stable housing at least 90 days following assistance.*
- *Sub-recipients using ESGP Prevention funds to place families in short-term emergency motels will ensure that the average motel stay does not exceed 5 days, **AND** that 90% of households placed in motels meet with a case manager within 3 days.*

## **C. Housing Case Management**

- *At least 90% of homeless households referred for case management will meet with a case manager (or housing advocate – D.V.) within 3 days of the referral.*
- *Within 90 days of referral, at least 70% of households will have at least 1 adult in the household who is employed **OR** has enrolled in an educational or training program, **OR** has qualified for income benefits such as TANF, SSI or G.A.*
- *Within 90 days of referral, at least 70% of households receiving case management from the Grantee will be stabilized in transitional or permanent housing. **AND** At least 70% of those households will remain stably housed for at least 90 days.*

## **D. Transitional Housing (State funding)**

- *At least 90% of households entering the transitional housing program will meet with a case manager within 3 days of program entry.*
- *At least 70% of households exiting the program will be exiting to a safe housing situation, such as: Renting a room or apartment, homeownership, independent living, single room occupancy, residential treatment or rehab, college, the military, or staying with relatives or friends in an arrangement that does not jeopardize their tenancy or put any member of the household at risk. **AND** at least 70% of the above households exiting the program to a safe housing situation will continue to be stably housed for at least 90 days.*

## **E. Youth Shelter & Services (State funding)**

- *At least 90% of youth entering the program will meet with a case manager within 3 days of program entry.*
- *At least 70% of youth exiting the program will have “safe exits” as defined by one of the following categories: College, Friends, Home with Family, Independent*

*Living, Job Corps, Military, Relative's Home, or Residential Treatment/Rehab. **AND** At least 70% of the above youth with a safe exit, will continue to be stably housed for at least 30 days.*

*•To establish baseline data, sub-recipients will report on the number of new residents, the number of residents exiting the program, and the average length of stay.*

*\* Sub-recipients shall also submit a quarterly "Safe Exit report" from the VCRHYP database. For the purposes of this grant, a "safe exit" shall be defined as one of the following: College, friends, home with family or staying with relatives, independent living, Job Corps, military, residential treatment/rehab.*

The Office of Economic Opportunity tracks performance measures for ESG sub-recipients quarterly. In the event that a sub-recipient's performance falls below 75% of a stated target, the sub-recipient, in conjunction with the State Office of Economic Opportunity, will develop a performance improvement plan. Continued failure to meet performance measures may result in loss of fees or cancellation of the grant agreement. An ability to meet or exceed performance targets will be consideration for automatic renewal of the grant agreement.

The Office of Economic Opportunity will be meeting with the McKinney Homeless Grants and Shelter Plus Care Program Administrator to share third quarter year-to-date performance data and evaluate program and performance outcomes across ESG, SHP, and Shelter Plus Care programs. As these performance measures are new in SFY 2012/FFY 2011, the Office of Economic Opportunity and stakeholders will be evaluating the performance measures over the course of the current program year to determine what adjustments are appropriate for the SFY 2013 program year.

## **APPENDIX I:**

### **HUD Table showing Prior Year ESG Funding**

#### **VERMONT FY 2010 / SFY 2011 Grant Fund Commitments**

<b>Activity Type</b>	<b>Obligated Amount</b>
Homeless Assistance	\$343,635
Homelessness Prevention	\$7,500
Administrative Activities	\$13,255
<b>Total FY 2010 Award</b>	<b>\$364,390.00</b>

**HUD Table showing current year ESG Funding (*following page*)**

VERMONT ESG PROGRAM - FY 2011 Detailed Budget Table					
First Allocation	\$365,227.00	<b>FY 2011</b> <b>Emergency Shelter Grants/Emergency Solutions Grants</b> <b>Program Allocations</b>			
Second Allocation	\$205,440.00				
Grant Amount	\$570,667.00				
Total Administration	\$42,800.03				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
<b>Emergency Shelter Grants Program</b>	Homeless Assistance	\$339,535.00	\$0.00		\$339,535.00
	<i>Rehab/Conversion</i>	\$0.00			\$0.00
	<i>Operations</i>	\$235,525.00			\$235,525.00
	<i>Essential Services</i>	\$104,010.00			\$104,010.00
	Homelessness Prevention	\$7,500.00			\$7,500.00
	Administration	\$18,192.00			\$18,192.00
	<b>Emergency Shelter Grants Subtotal</b>	<b>\$365,227.00</b>	<b>\$0.00</b>		<b>\$365,227.00</b>
<b>Emergency Solutions Grants Program</b>	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	\$135,624.00	\$135,624.00
	<i>Housing Relocation and Stabilization Services</i>			\$135,624.00	\$135,624.00
	<i>Tenant-Based Rental Assistance</i>				\$0.00
	<i>Project-Based Rental Assistance</i>				\$0.00
	Homelessness Prevention		\$0.00	\$45,208.00	\$45,208.00
	<i>Housing Relocation and Stabilization Services</i>			\$45,208.00	\$45,208.00
	<i>Tenant-Based Rental Assistance</i>				\$0.00
	<i>Project-Based Rental Assistance</i>				\$0.00
	Administration			\$24,608.00	\$24,608.00
		<b>Emergency Solutions Grants Subtotal</b>		<b>\$0.00</b>	<b>\$205,440.00</b>
		<b>Total Grant Amount:</b>			<b>\$570,667.00</b>

\*\*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).



## APPENDIX II. DEFINITION OF HOMELESSNESS

Published by U.S. Dept. of Housing and Urban Development - November 15, 2011

### Adopted by the Vermont Agency of Human Services

**(1)** An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

(i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;

(ii) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or

(iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;

**(2)** An individual or family who will imminently lose their primary nighttime residence, provided that:

(i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;

(ii) No subsequent residence has been identified; and

(iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;

**(3)** Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:

(i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

(ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

(iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and

(iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

**(4) Any individual or family who:**

(i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;

(ii) Has no other residence; and

(iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

**Appendix III – DEFINITION: AT RISK OF HOMELESSNESS**  
 (Source: ESG Interim Rule / HUD Housing Resource Exchange)

<b>CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS</b>	<b>Category 1</b>	<b>Individuals and Families</b>	An individual or family who: (i) Has an annual income below 30% of median family income <u>for the county</u> ; AND (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; AND (iii) Meets one of the following conditions: (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR (B) Is living in the home of another because of economic hardship; OR (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; OR (F) Is exiting a publicly funded institution or system of care.
	<b>Category 2</b>	<b>Unaccompanied Children and Youth</b>	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
	<b>Category 3</b>	<b>Families with Children and Youth</b>	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.