



# Second Program Year Action Plan - **AMENDED**

The CPMP Second Annual Action Plan includes the [SF 424](#) and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

## Narrative Responses

### GENERAL

#### **Executive Summary**

##### **Program Year 2 Action Plan Amendment Executive Summary**

The Louisville/Jefferson County Metro Government 2011 Action Plan submitted to the U.S. Department of Housing and Urban Development (HUD) in May 2011 outlined projects and programs for 2011 aimed at addressing the goals identified in the five-year, 2010 to 2014, Louisville/Jefferson County Metro Government Consolidated Plan (Con Plan). These projects and programs include affordable housing, homeless prevention, supportive services, economic development, and community development activities.

Louisville/Jefferson County Metro Government's Citizen Participation Plan was designed to encourage active citizen participation in both the identification of needs within the community and the development of the goals and strategies to address those needs. This plan, which provides guidelines for all phases of consolidated planning, including amendments, deems that an amendment to the Action Plan is warranted given substantial changes which include the addition or deletion of an activity not previously included in the Consolidated Plan, changes to the location of an activity which affect the original scope of the project, changes to the scope of an activity which affect the original beneficiaries, changes in the scope of an activity due to modifications in funding level (a funding adjustment totaling 25% or more in a program year Action Plan budget for the project) and a series of changes representing a cumulative total of 10% or more in a program year Action Plan budget.

The Third Amendment to the 2011 Action Plan is concerned with the second allocation of \$294,334 in Emergency Solutions Grant funding. Louisville Metro will use these funds to centralize and improve HMIS data collection, through Louisville's HMIS Lead (The Coalition for the Homeless) and to implement a Rapid Re-Housing Program.

All allocations proposed above are subject to approval by the Louisville Metro Council.

#### **Citizen Participation**

A legal advertisement announcing the public comment period was published in the Courier-Journal on April 13<sup>th</sup>, 2012. A public comment period will be held between April 13<sup>th</sup>, 2012 and May 13<sup>th</sup>, 2012.

#### **Collaboration and Consultation Process**

The Emergency Solutions Grants Program Manager has consulted and collaborated with the Continuum of Care through a series of meetings, presentations and conversations. The ESG Program Manager met with the CoC coordinator on February 15th, 2012 to draft the Written Standards, the Performance Standards and to discuss changes to HMIS. The program manager then presented the draft of that work to the CoC's Advisory Board on February 29<sup>th</sup>. The Advisory Board suggested presenting the outline to the entire CoC at the next meeting on March 5th and establishing a series of Task Force Meetings to address the most outstanding issues. The presentation was made and four Task Force groups were established: the Assessment Task Force, the Client Criteria Task Force, the Institutional Discharge Task Force and the Homeless Participation Task Force. There were a series of task force meetings between March 12<sup>th</sup>, 2012 and March 22<sup>nd</sup> to discuss the written standards. The work of the task force groups was incorporated into the written standards and the work from the meetings was distributed to the entire CoC by emailing the meeting notes.

Louisville Metro also met individually with each previously funded ESG subgrantees between March 16<sup>th</sup> and March 19<sup>th</sup> to discuss the changes outlined in the interim rule. These agencies shared their questions, concerns and comments regarding the ESG rule changes. The biggest issue to emerge from these meetings was how the changes would affect previously funded transitional housing programs. Louisville Metro coordinated a meeting between the local HUD CPD Office and all of the previously funded transitional housing programs to discuss the future of transitional housing under ESG.

To address the needs of special populations in the written standards, Louisville Metro's CSR department has consulted and collaborated with agencies who serve those with mental illness, the chronically homeless, victims of domestic violence and sexual assault and those who are affected by HIV/AIDS to provide input under the ESG Written Standards on how to best serve these vulnerable groups. The ESG program manager solicited input through email and included the input in the written standards and the common assessment. Service providers who serve these groups also participated in the task force meetings.

### **Matching Resources**

Matching resources for the Rapid Re-housing activities, which account for \$137,789.00 of the second allocation, will be provided by Louisville Metro's CSR department in the form of a cash match. The matching funds are Louisville Metro General Funds used to provide rental assistance to persons with no income who are facing eviction.

Matching resources for the HMIS Single Point of Entry project will be matched by the subgrantee 1:1. Matching funds will be used for HMIS activities in the amount of \$120,000.

### **Proposed Activities**

In correspondence with the fourth priority need (Goal 4) of Louisville Metro Community Services and Revitalization (LMCSR) Consolidated Plan 2010 – 2015. LMCSR will be providing Rapid Re-Housing services. In accordance with HUD guidance, LMCSR is using the second allocation to provide Rapid Re-Housing and HMIS activities. These activities will take place between July 1, 2012 and June 30, 2013.

**Goal:** to reduce the incidence of homelessness in the community

**Objective 4.8:** Provide Rapid Re-Housing Assistance and Housing Stabilization and Relocation Services

**Outcome:** 50-60 Households will be rapidly re-housed and provided with housing relocation and stabilization services.

**Performance Indicator:** The Point-In-Time count and Homeless Census will show a proportionate decrease in the homeless in population in Louisville

**Projected Accomplishments:** 50 – 60 households will be placed in permanent housing and will maintain that housing for six months.

Louisville Metro Community Services and Revitalization (LMCSR) plans to provide rapid re-housing direct assistance for the Metro Louisville community with the new Emergency Solutions Grant (ESG). LMCSR plans to utilize portions of the successful Homelessness Prevention and Rapid Re-Housing Program (HPRP) as a guide for program design and implementation. Plans are to provide rapid re-housing rental assistance and utility arrearage assistance for up to 24 months for qualifying households. All direct client assistance will be distributed via a lump sum payment standard, based on household size. All rapid re-housing households will be provided with individualized and monthly case management services during program participation. The new coordinated intake system will help identify those households who are a good fit for ESG rapid re-housing assistance. In general, ESG rapid re-housing candidates will typically be identified as newly homeless and with some potential for rapid housing sustainability (due to previous work history, educational attainment, previous housing stability, etc.). It is anticipated that the new ESG rapid re-housing program will be able to provide on-going direct assistance to approximately 50 households during the 2012 program year.

In correspondence with the fourth priority need (Goal 4) of Louisville Metro Community Services and LMCSR will be providing an HMIS Single Point of Entry.

**Goal:** to reduce the incidence of homelessness in the community

**Objective 4.9:** To provide a single point of entry, a common assessment and a universal verification of homelessness for the Homeless Service Providers in Louisville.

**Outcome:** At least 8,000 homeless persons who are seeking Emergency Shelter in Louisville will be entered into HMIS at the Single Point of Entry and receive housing and services referrals to address their housing barriers.

**Performance Indicator:** The Point-In-Time count and Homeless Census will show a proportionate decrease in the homeless in population in Louisville.

**Projected Accomplishments:** 77% of people who enter permanent supported housing will stay there for at least 6 months. 65% of the people entering transitional housing will move to permanent housing. 25% of the people leaving the system will leave with employment.

Louisville Metro, through Louisville Metro's HMIS Lead, The Coalition for the Homeless, plans to centralize HMIS intake for homeless persons in Louisville Metro using ESG funds. The Coalition for the Homeless will train and supervise staff that will be responsible for ensuring that every person who enters the homeless shelter system is entered into HMIS accurately. The Coalition is also exploring a scan card system for ESG program participants and other homeless persons to use in Louisville. The goal of this project is to reduce the burden of HMIS data entry on ESG subrecipients and improve Louisville's HMIS data quality. ESG will fund staff to enter HMIS data and the equipment necessary to implement system changes such as computers, printers, and scanners.

### **Funding Priorities**

LMCSR funding priorities include HMIS and Rapid Re-Housing.

### ***Emergency Solutions Grants Written Standards***

#### ***Standard Policies and Procedures for evaluating persons or families eligible for assistance***

All persons who receive ESG assistance will be evaluated using a common assessment. This assessment begins at intake at any agency that belongs to Louisville's CoC. The common assessment will be two-part: The first step will be for intake staff to collect the 11 HMIS data points necessary to enter the client into the HMIS system and to determine the type of assistance the client needs, based on their housing status. The types of assistance available will fall into 4 categories: prevention, rapid re-housing, emergency shelter and homeless services. The intake staff will also evaluate ESG eligibility and a

participant's eligibility will be confirmed during the second part of the assessment. The second part of the assessment will be an in-depth assessment of the client's needs. An individual plan for that client will then be developed that includes a housing goal and an income goal. The plan will also include the referral to mainstream resources, such as Social Security Disability, food stamps, Section 8, or services for veterans. Program participants will then be referred to appropriate, available CoC or ESG program. Each client's individual plan will go with him or her. At the end of each secondary assessment, a checklist will be completed that will determine which programs may be appropriate for that participant. The agency staff will then go over the program options with the client to address questions, concerns and preferences. The staff will check the capacity of the best program for that client. If the first program choice is full and will be at capacity for more than 30 days, the agency staff will direct the client to the next best program.

The Louisville HMIS Lead (The Coalition for the Homeless) is developing a proposal to improve Louisville's HMIS data collection through centralization. This includes researching and exploring best practices in cities like Cincinnati, Birmingham and Columbus. This centralization will include using staff trained and supervised by the Coalition for the Homeless, Louisville's HMIS experts, to do the initial HMIS intake. Louisville Metro is exploring the use of scan cards to eliminate the daily manual entry and exit of program participants. The goal of this proposal will be to develop a system that reduces the data entry burden on subrecipients and improves the overall data quality. Once a plan has been fully developed, this will be the first part of the common assessment process.

**Policies and procedures for coordination among providers**

Coordination among providers will be attained through the Continuum of Care, the common assessment process and our community's White Flag program. The common assessment process will allow providers to refer clients to other providers as appropriate. All ESG providers are required to be active participants in our community's Continuum of Care, which will serve as a vehicle to discuss system-wide issues and concerns. Our community's White Flag program is our community's coordinated response to weather related events that make it unsafe for people to be on the streets.

**Policies and procedures for determining and prioritizing who will receive homeless prevention or rapid re-housing**

Program placement will be based on need, eligibility, capacity of the programs and the appropriateness of programs for participants. Program participants who are eligible for Shelter Plus Care or other subsidized permanent housing programs will be referred to those programs first. Program participants who are at-risk of homelessness but who will lose their housing before a prevention program can be of assistance will be referred to a rapid re-housing program. Those who are imminently homeless will also be referred to Rapid Re-Housing. The placement of other participants in a rapid re-housing or prevention program will be determined during the in-depth assessment process and the development of an individualized plan. Participants who seem to be able to achieve housing stability with a short period of assistance will be prioritized for rapid re-housing programs.

**Standards for determining the participant share of rent and utilities**

The participant share of rent and utilities will be determined in one of two ways, either through a "shallow subsidy" model or a "lump sum" model. Louisville Metro's Community Services and Revitalization department intends to do a "lump sum" payment standard for ESG direct client assistance. The payment standard will be based on household size (i.e. single-person household will receive up to \$500 in monthly ESG assistance, two-person household will receive up to \$550, etc.). Louisville HPRP had considerable success administering a lump sum payment standard for HPRP. The monthly payment will be for rent, but utility payments could be made on a case-by-case basis (provided that the lump sum assistance amount is not exceeded for the household size). Other agencies in Louisville who provide Rapid Re-Housing assistance or Prevention financial assistance can use either model.

**Standards for determining the length and level of assistance**

Prevention assistance will be provided to eligible program participants in the amount necessary to stabilize their housing, as determined by the assessment process. The standards used to determine the amount to be provided will include: the level of available social supports (i.e. whether or not the person being assessed has exhausted supports from family, friends, churches or other potential supports.) and

the documentation of eligibility and need (i.e. the documentation of income and the threat to housing stability.)

Emergency Shelter will be provided to program participants who are homeless, as defined by HUD in 24 CFR 576.2.1. Emergency Shelter will be provided for no more than 180 days, with the expectation that program participants will have moved on to a housing solution. The exception to the 180 day length of stay will be made for those program participants who refuse other services in writing before they exceed 180 days in an emergency shelter in a program year. An exception can also be made if an individual plan calls for permanent housing or transitional housing, but those programs are at capacity. Essential Services will be available to any program participant utilizing Emergency Shelter. A case manager will provide an in-depth assessment and individualized plan for all program participants within the first 14 days of a participant's stay in the shelter. Additional case management will be provided on an as needed basis and no-less than monthly for program participants in emergency shelter until they are moved to a program providing them a housing solution.

Rapid Re-housing rental assistance will be provided to program participants who are prioritized through the in-depth assessment process. Program participants who can achieve housing stability in a short amount of time will be prioritized to receive Rapid Re-Housing assistance. The standards used to determine whether or not a program participant can achieve housing stability in a short amount of time will include current income, employment history, job readiness, financial issues (including debt), educational attainment, health issues (including mental health and addiction), criminal history, and other issues that may prevent a person from attaining or maintaining housing. These issues will not affect a participant's eligibility but will be used to determine the suitability of a rapid re-housing program and the length of assistance. A person with more issues preventing them from attaining and maintaining housing stability will receive more assistance than a person with less need. A common tool will be developed and applied to each participant to objectively determine the length and amount of assistance received. Those who need short-term assistance will receive 3 months of rental assistance. Those who need medium-term assistance will receive 3-24 months of assistance. All Rapid Re-Housing participants will be re-evaluated once every 3 months. No participant may receive more than 24 months of assistance over 3 years and no participant can be promised assistance outside of a program year as dictated by an agency's grant agreement.

All ESG subrecipients will have a written termination procedure with the following minimum standards: written notice to the program participant containing a clear statement of the reasons for termination; a review of the decision, in which the program participant is given the opportunity to present written or oral objections to a person who is not the person who initiated the termination or a subordinate of that person; and prompt written notice of the final decision to the program participant. The termination of a client will not bar the program participant from receiving further assistance at a later date.

**Standards for determining the type, amount and duration of housing stabilization services, including limits.**

Housing stabilization services will be provided as needed to program participants receiving prevention and rapid re-housing assistance. Each ESG participant receiving housing stabilization services will have a unique and individualized case plan. Housing stability case management will be provided once a month to program participants. Except for housing case management, no participant may receive more than 24 months of assistance over 3 years.

**Standards for Street Outreach**

Several street outreach teams are currently active within the Louisville Continuum of Care (CoC). The Seven Counties Mental Health Outreach team is funded through the Louisville CoC and is the primary street outreach team for homeless adults with mental health concerns in Louisville. YMCA Safe Place Services is funded partially with Street Outreach Runaway and Homeless Youth funding through DHHS and focuses on at-risk populations of 12 to 22 year olds, with primary education efforts to 12 to 17 year olds and street outreach and case management services to 18 to 22 year olds. They perform street outreach 5 days/nights a week in areas all around Louisville. Seven Counties leads the annual homeless Street Count each January and has also been instrumental with the Rx: Housing initiative (100,000 Homes campaign).

Homeless street outreach is also performed in Louisville by the Wayside Christian Mission Samaritan Patrol, the River City Love Squad, and the Healing Place CAP Van outreach effort. These additional outreach teams do not receive Continuum of Care funding and operate on a more limited basis, but do perform consistent homeless street outreach efforts throughout the year.

Due to the strong network of local shelters and day shelters in Louisville, most of Louisville's homeless are using either day or evening shelters (and subsequently not sleeping outside). Louisville's Homeless Census and Point-In-Time data substantiate those numbers. Subsequently, street outreach efforts are not anticipated to be a top priority for ESG funding. However, written standards for street outreach will be expanded upon in the next year as part of our planning process for next year's ESG grant fund use.

#### **Standards for Emergency Shelters**

ESG Program Participants will be admitted to the shelter system through the centralized HMIS intake, where the capacity of each shelter, client preference and client eligibility will be assessed before the client is admitted to a shelter. The centralized HMIS intake will refer clients to a shelter with available beds and divert persons who are not eligible or if all shelters are at capacity.

The age of a child (under 18) must not be used as a basis for denying any families' admission to a shelter using ESG funds and provides shelter to families with children under 18.

Emergency shelters will discharge participants once participants have been referred and accepted into another program or have accessed permanent housing. Emergency shelter will follow the same termination policy outlined in the Standards for Determining the Length and Level of Assistance.

All emergency shelters in Louisville are licensed through Louisville Metro Government's Land Development Code. Each shelter is subject to annual inspections for health and safety. In addition, all of Louisville's emergency shelters undergo the Quality Assurance Standard (QAS) process employed by the Coalition for the Homeless. The QAS process reviews health, safety, sanitation, programmatic, and other conditions at the specific shelters. Failure to comply with the QAS process and standards is reported by the Coalition to Louisville Metro and a lack of compliance will elevate a subrecipient's risk assessment status and is a factor in ESG funding decisions.

The needs of special populations will be addressed by identifying program participants who are affected by HIV/AIDS, mental health issues, domestic violence, sexual assault or other issues that require additional services besides those offered to the general population and referring those participants to appropriate services. Louisville Metro has collaborated with agencies who serve these populations to include questions that will identify participants with special needs during the assessment process. Training and tools will be delivered to ESG subrecipients so that all subrecipients will be able to identify those persons with special needs and refer them appropriately. The common assessment will be accompanied by a checklist that helps agencies refer participants appropriately. So if a program participant's checklist indicates that they are HIV positive or may have a mental illness, the checklist would indicate where to refer that client for further services and evaluation. Specifically: participants who are identified as having disabling conditions may be referred to Shelter Plus Care, participants who have identified themselves as HIV+ will be referred to House of Ruth for potential HOPWA TBRA and to the Ryan White funded Care Coordinator program at VOA, participants who have been sexually assaulted or who are fleeing domestic violence will be referred to the Center for Women and Families and those with mental illness disabilities are referred to Seven Counties Services, Wellspring or another agency that provides mental health services.

In addition to the tools provided through the common assessment and referral process, training will be provided to help deal with the sensitive issues of these vulnerable populations. The Center for Women and Families will provide an annual training to the CoC about domestic violence and sexual assault. AIDS Interfaith Ministries, the VOA Care Coordinator program and House of Ruth will participate in a training event around serving those affected by HIV/AIDS. The ESG program manager will work to coordinate other trainings related to serving vulnerable populations.

#### **Homeless Participation Policy**

The CoC has established a Homeless Participation Task Force. This group will organize a Client Participation group that will serve to engage those who are homeless or who are formerly homeless. The task force will be made up of mostly emergency shelter staff members who will do outreach to potential group members and run the meetings. The purpose of the Client Participation group will be to engage

those served by the homeless system, inform them of policy issues and seek their input on these issues. Insight and information gained from the meetings will be sent to each participating agency's board and to the board of the Coalition for the Homeless. When appropriate the Coalition will engage agencies in a wider conversation about how to address information that arises from the client participation group, including whether or not to change policies and procedures that all participating agencies are held to. ESG agencies who are actively engaged in this group will be able to meet the ESG rules and regulations' requirements for participation from the homeless and formerly homeless.

All ESG subrecipients will ensure that their client participation policy includes either active engagement in the Client Participation group or the participation of a homeless or formerly homeless person on their board. To be actively engaged, subrecipients will need to identify a Client Participation Coordinator who is responsible for recruiting and empowering clients to attend the group meetings and ensuring that the information from the meeting reaches their agency's board. Agencies will also be required to report annually to the Louisville Metro Government ESG Program Manager about how they used the information they received from these meetings to inform policies and procedures at their agency. The purpose of this policy is to actively engage those who are served by the homeless services system in a meaningful, effective and efficient way and to help subrecipients meet ESG requirements. Any renovations or construction projects can be vetted at the group meetings. ESG subrecipients will still need to have a written client participation policy and work to include homeless or formerly homeless persons in the delivery of services and upkeep of property through employment or volunteer opportunities.

**Participation in HMIS and Performance Standards to evaluate ESG activities**

Louisville Metro CSR department requires that all ESG subrecipients participate in HMIS. (Except for those providing legal services, services to the victims of domestic violence or sexual assault and those serving HIV/AIDS affected participants; as applicable under ESG rules and regulations. Subrecipients serving these populations are required to use an equivocal system to provide the necessary reports to CSR.) This requirement will be included in each subrecipient's grant agreement and will be enforced through monitoring.

Also, ESG Performance standards will be measured through HMIS. The standards that will be measured to evaluate ESG activities include: service provider's ability to move persons from emergency/transitional/unstable housing to permanent housing, service provider's ability to assist clients increase income from entry into the homeless provider system to exit, service provider's ability to reduce the recidivism rate within the homeless provider system, and a service provider's ability to reduce the length of people's stay within the homeless provider system; as well as occupancy rates (average of four PIT counts) for overnight shelters and service delivery rates (how often/how much case management is being provided) for service providers.

**Institutional Discharge**

The CoC has established an Institutional Discharge Task Force. The task force will work to coordinate with the CoC and major state institutions related to mental health, health, foster care and prisons to prevent the discharge of persons from these institutions into homelessness. Emergency Shelters will document incidences where they suspect persons were discharged from an institution into homelessness and report that information to the task force. The task force will then host a meeting at least twice a year for the state institutions to discuss the information provided by shelters and determine solutions to prevent people from being discharged into homelessness. The task force will also publish a quarterly report from HMIS showing how many participants came from institutions to the shelters and an annual report on the work of the task force for the year.

***Process for making subawards (LG)***

Louisville Metro Government plans to develop a task force to research the homeless population needs within the Louisville/ Jefferson County service area. These funding priorities will help to determine the process by which to make ESG sub-awards. For the second allocation of ESG funds for Program Year 2012, Louisville Metro chose to award \$120,000 to the Coalition for the Homeless, which is the lead HMIS agency within Louisville Metro.

FY 2011 Detailed Budget Table					
First Allocation	\$523,261.00	<b>FY 2011</b> <b><u>Emergency Shelter Grants/Emergency Solutions Grants</u></b> <b><u>Program Allocations</u></b>			
Second Allocation	\$294,334.00				
Grant Amount	\$817,595.00				
Total Administration	\$61,319.63				
		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	\$430,300.00	\$0.00		\$430,300.00
	<i>Rehab/Conversion</i>	\$0.00	\$0.00		\$0.00
	<i>Operations</i>	\$248,835.00	\$0.00		\$248,835.00
	<i>Essential Services</i>	\$181,465.00	\$0.00		\$181,465.00
	Homelessness Prevention	\$65,200.00	\$0.00		\$65,200.00
	Administration	\$24,775.00	\$0.00		\$24,775.00
<b>Emergency Shelter Grants Subtotal</b>		<b>\$520,275.00</b>	<b>\$0.00</b>		<b>\$520,275.00</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	\$120,000.00	\$120,000.00
	Rapid Re-housing		\$0.00	\$137,789.00	\$137,789.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$49,439.00	\$49,439.00
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$107,278.00	\$107,278.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Homelessness Prevention		\$0.00	\$0.00	\$0.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$0.00	\$0
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$0.00	\$0
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Administration			\$36,545.00	\$36,545.00
<b>Emergency Solutions Grants Subtotal</b>			<b>\$0.00</b>	<b>\$294,334.00</b>	<b>\$294,334.00</b>
				<b>Total Grant Amount:</b>	<b>\$814,609.00</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).