
**DRAFT OF
SUBSTANTIAL
AMENDMENT TO ONE
YEAR ACTION PLAN
2011-2012
AS PRESENTED MARCH 22,
2012**

Introduction

On April 28, 2011, the City of Somerville adopted the One Year Action Plan for 2011. At the time, the total funding was estimated at \$8,109,689, including HUD Community Block grant (CDBG) funds, HUD HOME Investment funds, and HUD Emergency Shelter Grant (ESG) program funds.

Since that date, the City has been notified that it is eligible for a second allocation of ESG funds, renamed Emergency Solutions Grant, in the amount of \$70,741. The amended Action Plan allocates these funds to rapidly re-house individuals and families living on the streets or in emergency shelters and prevent homelessness for those at risk of losing their housing, thus decreasing the number of persons who are homeless within the community.

Consultation related to eligible ESG activities, funding, policies and procedures, and administration of Homeless Management Information System (HMIS) were discussed with the Continuum of Care. The Continuum of Care identified services and prioritized the most critical needs in the community and how those needs can be best met through local ESG funds; and established performance standards; and evaluated current use of ESG funds; and procedures and policies around HMIS.

A Public Hearing and Presentation was developed to provide citizen and interested parties with an opportunity to participate in the planning, implementation and evaluation of the amendment to the Emergency Solutions Grant. The meeting was held in an accessible public building, the Amended Action Plan was presented, citizens had an opportunity to comment or were told how to submit comments, citizens had not less than 30 days to comment on the plan, and all comments and views were considered in preparing the final Amended Action Plan. A summary of the comments and views are attached to the substantial amendment.

Emergency Shelter Grant and Emergency Solution Grant Program

There will be no changes to contracts awarded through the original Emergency Shelter Grant Program.

Through a RFP process, the City of Somerville will use its total second allocation of Emergency Solution Grant funds (\$70,741) to select rapid re-housing and homeless prevention programs to assist persons who are living in shelters and on the streets or at risk of homelessness and for program administration (not to exceed 7.5 percent) and HMIS. Awarded agencies will adopt a collaborative approach aligning mainstream housing, health, education and human services to prevent homelessness. Resources will be awarded to advance housing stability and permanency for homeless persons. Awarded agencies will demonstrate a match for these ESG funds and will collect and comply with HMIS reporting and outcome measurements. Awarded agencies will comply with written standards as required under 24 CFR 91.220(l)(4)(i) and 576.400 (e)(1) and (e)(3). The written agreement with awarded agencies will describe the standards and procedures that will be used for monitoring activities to ensure compliance with program requirements and compliance with appropriate levels of staffing.

Summary of Consultation Process

In order to ensure greater collaboration with the local Continuum of Care, on February 14, 2012 City of Somerville staff attended a special meeting of the Somerville-Arlington Homeless Providers Group, the convening body of the Somerville-Arlington Continuum of Care. The Somerville-Arlington Homeless Providers Group (SAHPG) was created by the municipalities and agencies involved in providing and advocating for housing and services to homeless persons, and those at risk of homelessness and includes all agencies who apply for Continuum of Care funds from HUD.

All current sub-recipients of ESG funds from the City of Somerville were also invited to attend the meeting. At the meeting, City staff presented background information on the substantial amendment and eligible uses of the additional allocation of funds. Feedback was sought from participants on identifying the greatest need for the additional funds to assist in determining how to allocate ESG funds, developing performance standards for activities, and developing HMIS funding, policies and procedures. Additional inquiries were made to agencies who were not able to attend the meeting, but who are involved in activities for homeless and formerly homeless populations. These comments were used to assist the City of Somerville in preparing the draft amendment for public comment. Minutes from the meeting are attached in Appendix A.

Summary of Citizen Participation Process

The City of Somerville has adopted a Citizen Participation Process to provide citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation and evaluation of the CDBG, HOME and ESG programs which primarily benefit Somerville's low- and moderate-income residents and to review and comment on Somerville's Consolidated Plan, One Year Annual Action Plan and CAPER. This Process, attached as Appendix B, was followed for this substantial amendment.

A public meeting was held on March 22nd at the Ralph and Jenny Center, and comments were accepted for 30 days following the meeting. The Flyer and Comments received are also included in Appendix B.

Match

All awarded sub-grantees will match dollar-for-dollar the ESG funding provided by HUD with funds from other public or private sources. The source and amounts of the supplemental funds will be reported once the grant is awarded. Funds used to match a previous ESG grant may not be used to match a subsequent grant award.

Proposed Activities and Overall Budget

See Chart in Appendix C.

Discussion of Funding Priorities

Under 24 CFR 576.100 (b) of the Interim Rule, the total amount of each recipient’s fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed the greater of:

- 1) 60 percent of the recipient’s fiscal year grant; or
- 2) The amount of FY2011 grant funds committed for homeless assistance activities.

The City of Somerville’s FY2011 grant funds were committed in the following way, therefore no additional funds may be used for street outreach or emergency shelter activities.

Declaration of FY 2011 Grant Fund Commitments

Activity Type	Obligated Amount
Homeless Assistance	\$122,961.00
Homelessness Prevention	\$0.00
Administrative Activities	\$2,800.00
Total FY 2010 Award	\$125,761.00

The City of Somerville will use its second allocation of Emergency Solution Grant funds to select programs that focus on rapid re-housing of individuals and families who are living in shelters and on the street and for homeless prevention for individuals and households who are at risk of homelessness. While the City of Somerville recognizes that HUD has placed an emphasis on rapid re-housing as the most effective way to help people transition out of homelessness and decrease homelessness within communities and will allocate a portion of ESG funds to this activity, conversations with homeless providers and data review suggest that an emphasis on homelessness prevention is a more effective use of ESG funds.

Despite best efforts by advocates and case managers to located affordable housing for rapid re-housing placement, it is often very difficult to do so in Somerville. Due to high rents, households seeking to exit homelessness often require an additional subsidy beyond one-time relocation assistance and often even beyond a 12-24 month period of assistance. Waiting lists for long-term permanent affordable housing in Somerville are very high. According to the Somerville Housing Authority, 1386 Somerville residents are currently on the Section 8 Centralized waiting list, 128 homeless. 9,387 Somerville residents are on the Somerville Public Housing waiting list, both family and elderly. No homeless preference exists for public

housing. The Somerville Homeless Coalition also reports difficulty in finding permanent housing for its homeless clients. Participants in their HPRP and PASS programs spend an average of 16 months receiving rental assistance before finding permanent affordable housing. In addition, vacancy rates are very low in Somerville, making it difficult to even locate available housing at an affordable rent. According to the 2010 American Community Survey 5 –Year Estimate, the rental vacancy rate is only 2.9%. Housing Costs are also very high. Over 35% of Somerville renters pay more than 35% of their income towards housing costs. As a result, a deep subsidy is often the only solution to rapid re-housing.

Conversations with homeless providers indicate that homelessness prevention is preferable in Somerville. Households needing assistance are already housed, often in a relatively affordable apartment, and a smaller subsidy and stabilization services can keep them housed while waiting to find a long-term subsidy. Somerville agencies have a long track record of performing homelessness prevention activities and have found it less disruptive to households and more cost-effective.

For this reason, a portion of funds has been allocated to rapid re-housing, but the largest portion has been dedicated towards homelessness prevention. Additional funds have been allocated to HMIS to hire a consultant to assist the City and ESG sub-recipients in meeting reporting requirements and development of policies and procedures to foster greater collaboration and coordination among ESG and CoC recipients.

A small portion of funds has been allocated to administrative costs to assist in monitoring and oversight.

This funding decision directly supports Objective 10 of *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, which seeks to “transform homeless services to crisis response systems that prevent homelessness and rapidly return people who experience homelessness to stable housing.” Both the rapid rehousing and homelessness prevention activities proposed to be funded through this allocation of ESG meets this goal directly. In addition, activities to better coordinate among ESG and CoC recipients and improve HMIS reporting compliance will meet Objective 1, to “Provide and promote collaborative leadership at all levels of government and across all sectors to inspire and energize Americans to commit to preventing and ending homelessness.”

In addition to high housing costs and low vacancy rates that affect all households, several populations in Somerville require additional attention. According to the Somerville Point In Time Homeless Count conducted on January 25, 2012, there were 153 homeless individuals in 114 households, living in either emergency or transitional housing or on the streets. Of these 153 individuals, 41.1% were chronically homeless, 44.4% had a severe mental illness, 26.7% were chronic substance abusers, 10% were veterans and 15.6% were victims of domestic violence. These populations all require some form of supportive services or specialized housing to ensure successful stabilization. The City of Somerville and the Somerville-Arlington Continuum of Care are committed to developing housing and services that meet the needs of each of these underserved populations. Pipeline projects under development in Somerville to address these needs include a 6 unit rental development for formerly homeless households will be built by the Somerville Community Corporation, with supportive services provided by the Somerville Homeless Coalition and a 22-unit transitional housing development with 7 permanent rental units for

veterans will be built by the Volunteers of America. Somerville is also home to a Domestic Violence emergency shelter, built with assistance from the City through HOME funds. Programs funded by ESG, HOME and the City of Somerville Affordable Housing Trust Fund also provide much-needed case management and substance abuse counseling to households facing additional obstacles to housing stabilization.

Detailed Budget

FY 2011 Detailed Budget Table					
First Allocation	\$125,761.00	FY 2011			
Second Allocation	\$70,741.00	<u>Emergency Shelter Grants/Emergency Solutions Grants</u>			
Grant Amount	\$196,502.00	<u>Program Allocations</u>			
Total Administration	12800 \$14,737.65	First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$122,961.00	\$0.00		\$122,961.00
	Rehab/Conversion	\$0.00			\$0.00
	Operations	\$120,580.00			\$120,580.00
	Essential Services	\$2,381.00			\$2,381.00
	Homelessness Prevention				\$0.00
	Administration	\$2,800.00			\$2,800.00
	Emergency Shelter Grants Subtotal	\$125,761.00	\$0.00		\$125,761.00
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	Renovation**			\$0.00	\$0.00
	Operation**			\$0.00	\$0.00
	Essential Service**			\$0.00	\$0.00
	URA Assistance**			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS			\$5,000.00	\$5,000.00
	Rapid Re-housing		\$0.00	\$16,000.00	\$16,000.00
	Housing Relocation and Stabilization Services		\$0.00	\$4,000.00	\$4,000.00

	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$12,000.00	\$12,000.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Homelessness Prevention		\$0.00	\$38,741.00	\$38,741.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$19,370.50	\$19,370.50
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$19,370.50	\$19,370.50
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Administration			\$11,000.00	\$11,000.00
	Emergency Solutions Grants Subtotal		\$0.00	\$70,741.00	\$70,741.00
			Total Grant Amount:		\$196,502.00

****Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities (see Section III.B. of this Notice).**

Written Standards for Provision of ESG Assistance

Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG)

All subgrantees will be required to evaluate each applicant for eligibility for ESG funds through an initial intake consultation, specifically whether an applicant for funds meets the definition of "homeless" or "at risk of homelessness" in accordance with 24 CFR 576.2, and whether an applicant meets income eligibility. All subgrantees will also be required to keep records regarding eligibility or ineligibility for each applicant in accordance with 24 CFR 576.500 (b), (c), (d), and (e).

Households must meet at least the following minimum criteria:

- 1) Income: Household's total income must be at or below 50% of AMI
- 2) Must be a Somerville Resident (defined as someone a) currently living in Somerville, b) living in a Somerville shelter, or c) living in Somerville immediately prior to becoming homeless.)
- 3) Housing Status: Household must be either homeless in accordance with 24 CFR 576.2 (to receive rapid re-housing assistance) or at risk of losing its housing in accordance with 24 CFR 576.2 (to receive homelessness prevention assistance); and must meet the following criteria
 - a. Not otherwise eligible for Emergency Assistance
 - b. No appropriate subsequent housing options have been identified

- c. The household lacks financial resources to obtain immediate housing or remain in its existing housing; and
- d. The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

Policies and procedures for 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.

Coordination among emergency shelter providers, essential services providers, homelessness prevention and rapid re-housing providers, other homeless assistance providers, and mainstream services and housing providers will be conducted in accordance with 24 CFR 576.400 (b). This will be facilitated through monthly meetings of the Somerville-Arlington Homeless Providers Group, to which all groups will be invited. All ESG sub-recipients will be required to have at least one representative attend each monthly meeting to ensure coordination.

Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and while eligible families and individuals will receive rapid re-housing assistance.

The City of Somerville recognizes that funds for homelessness prevention and rapid rehousing are limited, but because the need is so great for both families and individuals and it is impossible to determine households that will need assistance in the future, families and individuals otherwise meeting eligibility criteria will receive assistance on a first come, first served basis. An individual or family's ability to sustain housing will not be used as a threshold for determining whether assistance will be provided. Sub-recipients may suggest alternative methods for prioritization of assistance to eligible families and individuals.

For homelessness prevention assistance, the following risk factors will be used to help determine individuals and families who are most in need of ESG homelessness prevention assistance to avoid moving into emergency shelter or some other form of homelessness:

- 1) Household has a rent increase of 50% or greater making rent (adjusted for utilities) higher than the applicable HUD Fair Market Rent (FMR) and more than 50% of gross household income
- 2) Household has a loss of more than 30% of household gross income due to a death, divorce, legal separation, separation, domestic violence, involuntary loss of wages, or being within one year of losing Department of Transitional Assistance income benefits
- 3) Household has been given notice to quit a current rental unit and unable to rent a new apartment for lack of funds to pay for upfront costs, such as a security deposit; or

Standards for determining share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.

Participants will be required to pay thirty percent (30%) of their Participant's household adjusted monthly income, provided that the Participant must pay no less than five dollars (\$5.00) a month towards rent and utilities. "Adjusted Monthly Income" is one-twelfth of Adjusted Income. "Adjusted Income" is Annual Income minus all applicable deductions and will be calculated in accordance with 24 CFR 5.611

Standards for 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.

Participants will be eligible for up to 12 months of rental assistance. The maximum amount of monthly rental assistance shall not exceed the attached Somerville Housing Authority Rent Payment Standard, minus thirty percent (30%) of the Participant's monthly adjusted income, provided that the Participant must pay at least five dollars (\$5.00) a month toward rent and the Participant's share of Gross Rent shall not exceed forty percent (40%) of Participant's household monthly adjusted income. "Gross Rent" means the rent including all utilities or all applicable utility allowances.

Participants receiving rapid re-housing assistance must be re-evaluated every six (6) months to determine eligibility and participant rent share.

Participants receiving homelessness prevention assistance must be re-evaluated every three (3) months to determine eligibility and participant rent share.

Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid 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.

Eligible uses of funds include rental arrearages, security deposits, or First and Last Month's Rent, utility arrearages, and moving costs. No funds may be used for other purposes. Participants may receive up to \$3,000 for the above stated uses, but the grant amount shall in no case exceed the amount needed to cover the eligible uses.

Participants must be required to submit documentation to verify the need for the requested funds, including but not limited to, a Notice to Quit, Landlord Letter, Court Summons and Complaint, Rent Ledger, Utility Bill or Shutoff Notice, HAP Contract from Housing Authority, Signed Lease, Moving

Company Bill Estimates, or other documents. Case managers should work with the household to determine the amount the household can afford to contribute to the costs. If necessary due to high costs, case managers should also attempt to negotiate for lowering arrearages with utility companies or landlords and establish payment plans for repayment of arrearages.

Making Sub-awards

The City will issue a Request for Proposals (RFP) for non-profits to suggest programs to enhance existing activities and transform homeless assistance with an emphasis on quickly re-housing people who become homeless and preventing homelessness. Applicants will submit proposals for eligible programs and create a plan that utilizes resources available to provide comprehensive services to assist eligible participants.

An Advisory Committee will review the proposals and make a funding recommendation to the Mayor based on proposals that will rapidly transition participants to stability, link program participants to community resources and mainstream benefits and help them develop a plan for preventing future housing instability. The Committee will look for proposals from agencies with proven experience working with the homeless and those at risk of homelessness. The proposals will have a clear process for determining the type, level and duration of assistance for each participant. A contract grant agreement will be negotiated with the chosen subgrantee(s) on or before September 30, 2012. 100% of the funds will be expended within 24 months of the date HUD signs the amendment to the FY2011 Action Plan. The subgrantee(s) will submit monthly invoices beginning July 31, 2012 and monthly thereafter for the duration of the contract. There will be an annual progress report invoice due July 15, 2013. The City will be responsible for monitoring and ensuring that the ESG funds are administered in accordance with the requirements of HUD.

Homeless Participation Requirement

The City of Somerville is unable to comply with Section 5476.405 (a) of the Interim Rule, as the policymaking entity for the City of Somerville consists of elected officials. Instead, the City of Somerville has developed the following strategies to ensure consultation with homeless and formerly homeless individuals in considering and making policies and decisions regarding any ESG-funded facilities, services, or other assistance;

- 1) The City will ask all ESG sub-recipients to administer a brief exit survey of all participants of ESG-funded activities soliciting feedback on the services they received and suggestions for future funding decisions and policies.

- 2) Outreach seeking public comments on the Annual Action Plan will be sent directly to ESG-funded shelters and programs and the agencies involved in the Somerville-Arlington CoC to solicit input on proposed activities.
- 3) Starting in FY13 the City will conduct an annual small focus group of 5-6 current participants in ESG-funded and CoC programs to solicit direct feedback and input.

Performance Standards

Sub-grantees will identify, collect and report client-level data in an HMIS or comparable client-level database on the amount of funding that has been obligated for each service type of activity (Rapid Re-Housing and Homeless Prevention). The Grantee will use HMIS to aggregate and report unduplicated client Program Performance data to HUD as required by the grant. Program Performance will include the number of persons and households served and the housing status at program entry to determine if the person/household is reported under Rapid Re-Housing or Homeless Prevention, the housing outcomes of the persons served through rapid re-housing and homeless prevention and financial information. Rapid re-housing assistance targets those individuals and families living on the streets or in emergency shelter. Homeless prevention clients, at entry, are households other than literally homeless who are provided assistance and stabilization services to prevent them from going to the streets and shelters. HMIS data quality will be checked by the sub-grantee at least quarterly. The instruction and timeline for submittal of Grantee reporting has not been finalized by HUD but sub-grantees will be expected to submit their portion of the data 10 days prior to the Grantee's due date.

An HMIS Policy and Procedure Manual and Confidentiality Regulations will be developed, reviewed and signed by each sub-grantee. The signature indicates agreement with the terms set forth in the Policy and Procedure Manual. The sub-grantee will maintain client records for four years following the end of the contract.

In order to be considered a comparable client-level database, a database must comply with HUD's HMIS Data and Technical Standards. The use of a comparable database is allowable under the following circumstances: the grantee and/or subgrantee has a long-standing, client-level legacy data collection system that meets requirements established in the HMIS Data Technical Standards and will integrate data with HMIS periodically or the subgrantee is a victim services provider and will establish a comparable client-level database internally to its organization and will provide only aggregate data to the grantee as required.

Optional Responses

Centralized or Coordinated Assessment System

While the City of Somerville has not yet established a centralized or coordinated assessment system, the Somerville-Arlington Continuum of Care is currently participating in the Continuum of Care Check-up Self Assessment to assist in developing a CoC Action Plan. Once HUD releases the CoC program rule, ESG

sub-recipients will be asked to participate in the development of a centralized and coordinated assessment system based on the results of the Check-up Self Assessment.

APPENDIX A
COLLABORTION WITH
CONTINUUM OF CARE

Appendix A – Minutes from Continuum of Care Meeting

Summary of Somerville – Arlington Continuum of Care meeting

Tuesday, February 12, 2012

Somerville Homeless Coalition

Attendees: There were one or more representatives from several social services agencies in Somerville and Arlington, particularly Arlington Housing Corporation, CASPAR, Catholic Charities, Community Action Agency of Somerville, Greater Boston Legal Services, Just-a-Start, Respond, Somerville Homeless Coalition, Volunteers of America and Wayside Youth and Family Support Network. Representatives from SPCD included Dana LeWinter, Kelly Donato and Penny Snyder

Dana presented the agenda for the meeting and stopped for questions and comments following each agenda item.

1. **Welcome and Introductions**
2. **Background on ESG Second Allocation and Timeline**

The City was notified by HUD of the Second ESG award of \$70,741 and is required to follow the Interim Rule related to this award. This meeting is being called to ensure collaboration with the Continuum of Care on the Amendment to the 2011-2012 One Year Action Plan.

In order to comply with HUD regulations, adherence to a general timeline is required.

The timeline is as follows:

Consultation/Collaboration with CoC	2-14 & 3-20
Draft of ConPlan Amendment	3-22
Citizen Participation Public Meeting	
Create and Translate Flyer	3-6
Advertise Public Meeting & Post on Website	3-7
Schedule & Present Public Meeting	3-22
Receive Comments for Inclusion in ConPlan	3-7 thru 4-24
Respond to Comments before	5-8
Amendment Submitted to Alderman for Approval	4-26
Submission of Amendment to HUD	5-15

3. **Discussion of Funding Allocation for ESG eligible activities with an emphasis on Rapid Re-Housing**

Some description of the eligible uses of the funds was provide, specifically the requirement that because the City has exceeded the 60% maximum, all of the additional funds must be allocated to HMIS, Admin (up to 7.5%), Rapid Re-Housing and Homelessness Prevention. It was also pointed out that HUD has placed an emphasis on

Rapid Re-Housing. All the agencies present agreed that although HUD has emphasized rapid re-housing, the reality is that the lack of affordable units in Somerville makes this goal next to impossible to implement. Many said that the funds would be better spent on homelessness prevention – ‘helping families stay where they are’ and favored ‘helping families establish a renting track record’. Some argued with Section 8 subsidies closed and long waiting lists for Public Housing units, they favored using homeless prevention funds to ‘help residents pay rent until other subsidies become available’. Several participants noted that it is difficult to find housing that is affordable without a subsidy, so prevention can keep them housed until that time and also allows the money to assist more households. This is how the HPRP funds were mostly used and all of the agencies felt their outcomes had been positive and they have a long track record of operating funds in this way.

CASPAR mentioned how hard it is for their clients to move from the ACCESS Program to independent living. Most clients receive 6 months of care and services but in order to take the next step, there need to be additional subsidies to move these clients to apartments.

Wayside and Catholic Charities felt Rapid ReHousing funds (particularly for first and last months rent and security deposits) is an important need for their clients who have already begun saving for their rent expenses once they exit the shelter.

The Arlington Housing Commission felt 90% of these ESG funds should be for Homeless Prevention – particularly Tenant Based Assistance.

There was discussion about a real need for a set aside in the budget for an HMIS consultant to help run reports. At this time SimTeck is providing HMIS trouble shooting services for HPRP agencies @\$1500/month which is shared by the agencies, but several participants anticipate the cost of this work increasing in the future.

4. Development of Performance Standards a) targeting those who need assistance the most, b) reducing people on street or in emergency shelter, c) shortening time spent homeless, d) reducing participant housing barriers and stability risks

A brief overview of these areas was provided by the OSPCD staff and a discussion of the development of these performance standards was held. Several themes/areas of consensus emerged.

- 1) Funds should be used for clients who are not otherwise eligible for EA funds.
- 2) Funds should be administered on a first come, first served basis.
- 3) The group felt that the need was just as strong for individuals as families, and no distinction in this regard should be made.
- 4) 3) Performance standards should measure client housing stability after 3 – 6 and 12 months; and could also measure how many clients received Section 8 subsidies or other permanent housing subsidies. Another performance standard might be how many found a job or addressed a housing risk and how it affected their housing outcome. All agencies concurred that prevention strategies affected client housing outcomes, i.e. such as help with budgeting and allocation, or receiving food stamps or child support. All agreed that removing housing barriers made a difference in the success and stability of the clients being served. Performance standards need to measure the outcomes and quantify the numbers

- being served. This is not always easy to do with clients who receive only one-time assistance – some clients are not easy to track/follow.
- 5) All providers agreed that 30 persons (many with more than one use) could be served with the awarded ESG funds.

5. Development of HMIS policies, procedures and funding

It was suggested that we review the HMIS policy and procedures developed by neighboring cities such as Cambridge and Quincy. All agreed that the manual should address data collection, confidentiality and release of information. If more than one agency receives funding, there must be consistency in client eligibility standards, classifying services, funding policies, closing/follow-up services, etc. The participants also agreed that some of the budget should be allocated to a consultant to assist in the management of HMIS. Several participants noted that it would be helpful to have some training as well, as they are not as comfortable with HMIS.

6. Homeless Participation requirement.

Dana mentioned that the Interim Rule requires a plan for consultation with homeless and formerly homeless individuals in considering ESG policies and procedures. Several agencies mentioned that the mental health and/or substance abuse issues that their clients deal with would make their participation in policy and procedure decisions difficult. However they suggested mandatory exit interviews with policy and procedure feedback for later implementation. The shelter directors suggested posting the Public Hearing meeting at their shelters to encourage their residents to participate and/or comment. The Public Hearing flyer was emailed to each shelter for posting. Shelter providers also suggested selecting homeless residents to participate in a couple of focus groups, with no more than 5-6 participants, to obtain constructive comments in a format that would be manageable.

7. Definition of “at risk”

Dana mentioned that we must define what “otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness” means if we plan to use this definition of “at-risk”. While the group agreed that they wanted a broad definition of “at risk”, they suggested that we look to the existing PASS program definition. Several agencies agreed that an “at risk” stage could be early in the eviction process, for example to be eligible a client could be 14 days or earlier in the eviction process, and/or have documentation/letter from the landlord. However, given the limited funds available at this time, it was generally agreed that using the standard HUD definition of at-risk would be best at this time.

The recent Point in Time Count was also discussed. Kelly noted an increase in unsheltered persons; 1 in Arlington and 8 in Somerville.

The remainder of the meeting was spent on other items of business, including a response to the state’s ESG planning efforts and discussion of upcoming housing developments, specifically the development at 1323 Broadway for veterans.

APPENDIX B
PUBLIC PARTICIPATION
PLAN



PUBLIC HEARING

Mayor Joseph A. Curtatone and the Office of Strategic Planning and Community Development invite you to a public hearing to receive community input on the proposed Substantial Amendment to the City's One Year Action Plan. The proposed Substantial Amendment is a response to HUD's notification of a second allocation of funding through the for Emergency Solutions Grant (ESG) program, specifically for rapid re-housing and homeless prevention. The purpose of the public hearing is to receive input from the community on the proposed rapid re-housing and homeless prevention activities and priorities for the program to be included in PY2012.

Thursday, March 22, 2012

5:30 PM

**Please join us at the Ralph and Jenny Center, 9 New
Washington, Somerville, MA**

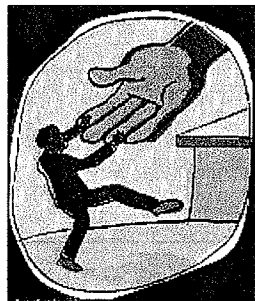
Accommodations for persons with disabilities by contacting Carlene Campbell at (617) 625-6600 ext. 2615

For more information contact the Office of Strategic Planning and Community Development at (617) 625-6600 ext. 2500

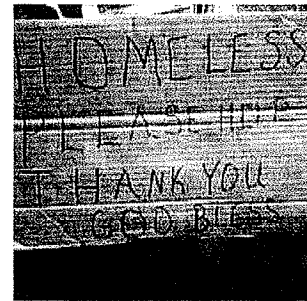
Written comments will be accepted up to Monday, April 23, 2012 @4:30 P.M., attention Penny Snyder at the Office of Strategic Planning and Community Development (OSPCD), 93 Highland Avenue, Somerville, MA 02143 or email to psnyder@somervillema.gov



*Re-Housing
Assistance*



Homeless Prevention



Street Outreach



AUDIENCIA PÚBLICA

El Alcalde Joseph A Curtatone y la Oficina de Planificación Estratégica y Desarrollo Comunitario les invitan a una audiencia pública para recibir la opinión de la comunidad sobre la propuesta modificación substancial al Plan de Acción de un Año de la Ciudad. La propuesta modificación es una respuesta a la notificación del HUD (Departamento de Vivienda y Desarrollo Urbano) de una segunda asignación de fondos a través del programa de Subvención de Soluciones de Emergencia (ESG), específicamente para el realojamiento rápido y la prevención del pérdida de hogar. El propósito de la audiencia pública es recibir aportaciones de la comunidad sobre las propuestas actividades de realojamiento rápido y prevención de pérdida de hogar y prioridades para el programa que se incluirán en PY2012.

Jueves, 22 de Marzo 2012

5:30 PM

**Por favor únase a nosotros en el Ralph and Jenny Center,
9 New Washington, Somerville, MA**

Para obtener comodidades para las personas con discapacidad contacté a
Carlene Campbell a (617) 625-6600 ext. 2615

Para obtener más información contacte a la Oficina de Planificación Estratégica y
Desarrollo Comunitario a (617) 625-6600 ext. 2500

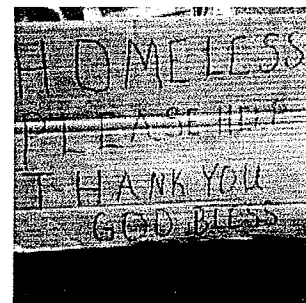
Comentarios escritos serán aceptados hasta Lunes, 23 de Abril 2012 @4:30 P.M., envíelos
por correo a la atención de Penny Snyder, Office of Strategic Planning and Community
Development (OSPCD), 93 Highland Avenue, Somerville, MA 02143 o por correo
electrónico a psnyder@somervillema.gov



*Asistencia de
Realojamiento*



*Prevención de
Pérdida de Hogar*



Street Outreach



PUBLIC HEARING

Mayor Joseph A. Curtatone and the Office of Strategic Planning and Community Development invite you to a public hearing to receive community input on the proposed Substantial Amendment to the City's One Year Action Plan. The proposed Substantial Amendment is a response to HUD'S notification of a second allocation of funding through the Emergency Solution Grant (ESG) program, specifically for rapid re-housing and homeless prevention. The purpose of the public Hearing is to receive input from the community on the proposed rapid re-housing and homeless prevention activities and priorities for the program to be included in PY2012.

THURSDAY, MARCH 22, 2012

5:30 PM

**Please join us at the Ralph and Jenny Center,
9 New Washington, Somerville, MA**

**Accommodations for persons with disabilities by contacting
Carlene Campbell at (617) 625-6600 ext. 2615**

**For more information contact the Office of Strategic Planning
and Community Development at (617) 625-6600 ext. 2500**

**Written comments will be accepted up to Monday, April 23, 2012 @ 4:30 P.M.,
attention Penny Snyder at the Office of Strategic Planning
and Community Development (OSPCD)
93 Highland Avenue, Somerville, MA 02143 or e-mail to
psnyder@somervillema.gov**



March 8, 2012

administrative office

315 Highland Avenue
Somerville, MA 02144

☎ 617.628.3850

☎ 617.628.6810

www.casparinc.org

PREVENTION

FirstStep Street Outreach
Youth Services

EMERGENCY SERVICES

Emergency Shelter

SUPPORT SERVICES

ACCESS

Drop-In Center
Employment Services

RESIDENTIAL TREATMENT

Men's Residential Programs
New Day
Woman's place

AFTERCARE HOUSING

Grow
Hagan Manor

* * *

Board of Directors

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Mark Shea
Paul Trant
Steven Williams

Wilfred W. Labiosa
Executive Director

Mrs. Penny Snyder
c/o City of Somerville
Office of Strategic Planning and Community Development
93 Highland Avenue
Somerville, MA 02143

Dear Mrs. Snyder & members of the OSPCD,

CASPAR's mission is to serve high risk individuals who are affected by substance abuse, mental health disorders, homelessness, and other conflicts, in the communities of Cambridge and Somerville. We have been able to provide street outreach, homeless prevention activities and some re-housing assistance activities for more than thirty years. In the last few years, we have needed to increase services but without the much needed staff or funding. Every year, we provide more than 3,500 individuals with programs that range from prevention activities such as street outreach to residential care and from supportive housing units to shelter beds. Due to the increased demand on these services, 2012 seems to be a year of higher demand than expected and if the year continues in our current status we may exceed this number.

We appreciate that HUD is releasing such funds to the city of Somerville. We see the increased demand for street outreach, homeless prevention, and re-housing assistance. We propose, if granted such funds, we will be able to increase our prevention and outreach efforts by an additional staff member. This person would focus solely in housing related outreach and case management activities. We will also be able to develop, with the support of the YMCA in Somerville, at least four units with supportive services including providing coverage of fees (up to one month) to avoid the individual from becoming homeless. This individual will assist clients in becoming re-housed in appropriate housing units across our city and surrounding communities, assist the individuals who are at risk of becoming homeless in acquiring appropriate placement, as well as conducting community outreach activities to educate others of our services and area housing programs.

First Step is the most comprehensive outreach program in our city and county. The increase of one individual to this outstanding team will help assist more than 8 individuals per day, 200 individuals per month, and over 2,000 clients per year. He/she will be able to work with the team in housing specific needs and preventing others in becoming homeless. It is our history of working with the target population that makes us a natural candidate for these funds.

The program directors and I are open to conversations and to work together with OSPCD, community members, and the Mayor in assisting in preventing homelessness and increasing assistance to those already homeless.

Sincerely yours,

Wilfred W. Labiosa
Executive Director

I. Introduction

The City of Somerville annually receives Community Development Block Grant (CDBG), HOME Investment Partnerships Program (HOME) and Emergency Shelter Grant (ESG) funds from the U.S. Department of Housing and Community Development (HUD), which it administers through the Somerville Mayor's Office of Strategic Planning and Community Development. The primary purpose of these formula grant programs is to develop viable communities through the provision of decent housing, a suitable living environment and expanding economic opportunities for low- and moderate-income persons. As a recipient of these entitlement program funds, the City is required to produce the following documents:

1. **Consolidated Plan:** A five-year plan that documents Somerville's housing and community development needs, outlines strategies to address those needs, and identifies proposed program accomplishments.
2. **Annual Action Plan:** An annual plan that describes specific CDBG-, HOME- and ESGfunded projects that will be undertaken over the course of the upcoming fiscal year.
3. **Consolidated Annual Performance and Evaluation Report (CAPER):** An annual report that evaluates the use of CDBG, HOME and ESG funds.

This Citizen Participation Plan has been developed to provide citizens and other interested parties with opportunities to participate in an advisory role in the planning, implementation and evaluation of the CDBG, HOME and ESG programs which primarily benefit Somerville's low- and moderate-income residents and to review and comment on each of the documents listed above.

II. Public Hearing Process

1. Frequency. The City will hold a minimum of two public hearings annually, at different times during the consolidated plan process to obtain citizen input on proposed programs and projects.
2. Location. Hearings will be held in areas of the City where CDBG funds are proposed to be used, specifically in neighborhoods of predominantly low- and moderate-income citizens as defined by the most recent U.S. census data.
3. Outreach. Public meeting notices will be published in both English and Spanish two weeks prior to the date of the hearing in general circulation publications within the City.
 - Translations of the public meeting notice in Haitian Creole and Portuguese, in addition to English and Spanish, will be published on the City's cable wheel.
 - Meetings will be posted in English on the City's website.
 - Fliers of the meeting will be posted and distributed in the following locations throughout the City:
 - Mailing to all public service agencies with a request that the fliers be translated, if possible, into languages other than Spanish, Portuguese, Haitian Creole or English, if this is appropriate for their constituency.
 - All branches of the Public Library
 - Front hall of City Hall
 - The Mayor's office
 - OSPCD front desk

- Other locations as deemed appropriate
- 4. Accessibility. All hearing/meeting locations will be handicapped accessible. Meetings will be advertised in English, Spanish, Portuguese and Haitian Creole (and other languages as appropriate). All ads, notices and fliers will include a TTY phone number and contact information to arrange for special accessibility requirements.
- 5. Information Provided. At the first public hearing after the City receives information on the amount of assistance it expects to receive from HUD (including grant funds and program income), the City will provide this information to the public. Generally, at each hearing the following information is to be provided:
 - Amount of assistance received from HUD annually (grants & program income);
 - The range of activities that may be under-taken using these funds, including the estimated amount that will benefit persons of low- and moderate-income;
 - The areas of the City where activities may be under-taken;
 - A description of the projects programs and services that are underway using currently available funds; and,
 - Copies of the most recently published consolidated plan; performance report; and other relevant documents (NRSA plans etc.)

III. Notification to Public Housing Authority

The City will provide information on a regular basis to the Somerville Housing Authority about consolidated plan activities related to its developments and surrounding communities so that the housing authority can:

- Make this information available at the annual public hearing required under the Comprehensive Grant program.
- Encourage participation among residents in the process of developing and implementing the consolidated plan.

IV. Citizen Comment on the Consolidated Plan / Amendments, and Performance Reports

1. Notification. The City will publish notification of the availability of the proposed Consolidated Plan in a newspaper of general circulation and on the City website giving citizens not less than 30 days for the Consolidated Plan and Amendments and not less than 15 days for the Performance Report to comment. This notice will include:
 - The date on which the plan will be available and the date by which comments must be received;
 - The name of the person and/or agency where comments should be directed; and,
 - The form that comments should take (written, email, fax etc.).
2. Location. The City will make the plan available at the following location for a period of not less than 30 days so that citizens may comment on the plan:
 - All branches of the public library;
 - Office of Strategic Planning and Community Development;
 - By email or parcel post as requested; and,
 - On the City website.
3. Consideration of Comments. All comments or views of Citizens received in writing, or orally at the public hearings will be considered in preparing the final consolidated plan.

V. Criteria for Amendments to the Consolidated Plan

A deletion or addition of an activity, source of income or objective will constitute a substantial change in the consolidated plan.

VI. Availability to the Public

The final Consolidated Plan and amendments and the final performance report will be made available to the public at the following locations and by the following means:

- All branches of the public library;
- Office of Strategic Planning and Community Development;
- By email or parcel post as requested; and,
- On the City website.

VII. Technical Assistance

The City will provide technical assistance to citizens, public agencies and other interested parties in providing technical assistance in developing proposals for funding under any of the programs covered by the Consolidated Plan.

**APPENDIX C
BUDGET
INFORMATION**

**City of Somerville
2011-2012 Action Plan
Funding Summary**

Entitlement Grant	prior to amendment	after amendment	
CDBG	2,585,615	2,585,615	
ESG	125,761	196,502	
HOME	850,454	850,454	
HOPWA	0	0	
Total	3,561,830		3,632,571
Prior Years' Program Income NOT previously programmed or reported			
CDBG	0	0	
ESG	0	0	
HOME	0	0	
HOPWA	0	0	
Total		0	0
Carried Forward/Reprogrammed Prior Years' Funds			
CDBG	3,085,189	3,085,189	
ESG	0	0	
HOME	210,224	210,224	
HOPWA	0	0	
CDBG-R	129,951	129,951	
HPRP	442,921	442,921	
Total	3,868,285		3,868,285
Total Estimated Program Income			
CDBG Econ Dev Reimbursement	530,603	530,603	
CDBG Housing Rehab Revol Loan	50,000	50,000	
CDBG Development Revol Loal	0	0	
Home PI Fund	50,000	50,000	
Total	630,603		630,603
Section 108 Loan Guarantee Fund	0	0	
TOTAL FUNDING SOURCES	8,060,718		8,131,459
Other Funds	3,787,761		3,787,761
Submitted Proposed Project Totals	11,848,479		11,919,220
TOTAL Entitlement & Program Income	4,192,433		4,263,174
Un-Submitted Proposed Projects Totals	0		0

Table 1: Suggested Format for Declaration of FY 2011 Grant Fund

Activity Type	Obligated Amount
Homeless Assistance	\$122,961.00
Homelessness Prevention	\$0.00
Administrative Activities	\$2,800.00
Total FY 2010 Award	\$125,761.00

Homeless Assistance

FY 2011 Detailed Budget Table

First Allocation	\$125,761.00	FY 2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations			
Second Allocation	\$70,741.00				
Grant Amount	\$196,502.00				
Total Administration	\$14,737.65				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$122,961.00	\$0.00		\$122,961.00
	<i>Rehab/Conversion</i>	\$0.00			\$0.00
	<i>Operations</i>	\$120,580.00			\$120,580.00
	<i>Essential Services</i>	\$2,381.00			\$2,381.00
	Homelessness Prevention				\$0.00
	Administration	\$2,800.00			\$2,800.00
	Emergency Shelter Grants Subtotal	\$125,761.00	\$0.00		\$125,761.00
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			\$5,000.00	\$5,000.00
	Rapid Re-housing		\$0.00	\$16,000.00	\$16,000.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$4,000.00	\$4,000.00
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$12,000.00	\$12,000.00
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Homelessness Prevention		\$0.00	\$38,741.00	\$38,741.00
	<i>Housing Relocation and Stabilization Services</i>		\$0.00	\$19,370.50	\$19,371
	<i>Tenant-Based Rental Assistance</i>		\$0.00	\$19,370.50	\$19,371
	<i>Project-Based Rental Assistance</i>		\$0.00	\$0.00	\$0.00
	Administration			\$11,000.00	\$11,000.00
		Emergency Solutions Grants Subtotal		\$0.00	\$70,741.00
			Total Grant Amount:		\$196,502.00

**Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities (see Section III.B. of this Notice).

amendment conplan

Activity	Description	Citation	HUD Objective/HUD Matrix Code	HUD Outcome	Start Date	End Date	Performance Indicator	Accomplishments	National Objective	ESG Match
HMIS	Funds to be allocated for consultant to assist with set up and training of staff, creating a procedure manual, assist with reporting and data quality checks	576.107	Suitable Living Environment 21A	Availability/accessibility	7/1/2012	6/30/2014	N/A	N/A	LMC	24 CFR 576.201

Activity	Description	Citation	HUD Objective/HU D Matrix Code	HUD Outcome	Start Date	End Date	Performance Indicator	Accomplishments	National Objective	ESG Match
Homeless Prevention	Funds to be allocated to qualified homeless providers who will provide short term subsidies to defray rent and utility arrearages for individuals/families who have received eviction or utility termination notices; security deposits or first month's rent to permit homeless person/family to move into an apartment; mediation program for landlord-tenant disputes; legal services programs for the representation of indigent tenants in eviction proceedings; other innovative programs and activities designed to prevent the incidence of homelessness; and tenant based rental assistance. A Request for Proposals (RFP) process will be used to select projects. Funds will be awarded based on the evaluation criteria published in the RFP.	576.103	Suitable Living Environment and Decent Housing	Availability/accessibility	7/1/2012	6/30/2014	Persons	20	LMC	24 CFR 576.201

05S

Activity	Description	Citation	HUD Objective/HU D Matrix Code	HUD Outcome	Start Date	End Date	Performance Indicator	Accomplishments	National Objective	ESG Match
Administration	Funds will be used for Grantee administration of Emergency Solutions Grant Program and will not exceed 7.5% of grant	576.108	Suitable Living Environment and Decent Housing	Availability/ac cessibility	7/1/2012	6/30/2014	N/A	N/A	LMC	24 CFR 576.201
			21A							

CERTIFICATES

**APPLICATION FOR
FEDERAL ASSISTANCE**

Version 7/03

1. TYPE OF SUBMISSION: Application		<input type="checkbox"/> Pre-application	2. DATE SUBMITTED May 15, 2012	Applicant Identifier
<input type="checkbox"/> Construction	<input type="checkbox"/> Construction		3. DATE RECEIVED BY STATE	State Application Identifier
<input checked="" type="checkbox"/> Non-Construction	<input type="checkbox"/> Non-Construction		4. DATE RECEIVED BY FEDERAL AGENCY	Federal Identifier S-09--MC-25-0012
5. APPLICANT INFORMATION				
Legal Name: City of Somerville		Organizational Unit: Department: Office of Strategic Planning and Community Development		
Organizational DUNS: 061054693		Division:		
Address: Street: 93 Highland Avenue		Name and telephone number of person to be contacted on matters involving this application (give area code)		
City: Somerville		Prefix: Mr.	First Name: Daniel	
County: Middlesex		Middle Name J.		
State: MA		Last Name Federico		
Zip Code 02143	Suffix:			
Country: USA		Email: dfederico@somervillema.gov		
6. EMPLOYER IDENTIFICATION NUMBER (EIN): 04-6001414		Phone Number (give area code) 617 625 6600 ext. 2536	Fax Number (give area code) 617 726 0722	
8. TYPE OF APPLICATION: <input type="checkbox"/> New <input type="checkbox"/> Continuation <input checked="" type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.) Other (specify) <input type="checkbox"/> <input type="checkbox"/> Substantial Amendment FY 2011 ESG Grant		7. TYPE OF APPLICANT: (See back of form for Application Types) C - Municipal Other (specify)		
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER: TITLE (Name of Program): 14-231		9. NAME OF FEDERAL AGENCY: US Department of HUD - CPD		
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.): Somerville, MA		11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT: Substantial Amendment for Second Allocation of FY 2011 ESG grant		
13. PROPOSED PROJECT Start Date: 07/01/2012		14. CONGRESSIONAL DISTRICTS OF: a. Applicant Eight		
Ending Date: 06/30/2014		b. Project Eighth		
15. ESTIMATED FUNDING:		16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?		
a. Federal	\$ 70,741 ⁰⁰	a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON		
b. Applicant	\$ ⁰⁰	DATE:		
c. State	\$ ⁰⁰	b. No. <input checked="" type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372		
d. Local	\$ ⁰⁰	<input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW		
e. Other	\$ ⁰⁰	17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?		
f. Program Income	\$ ⁰⁰	<input type="checkbox"/> Yes If "Yes" attach an explanation. <input checked="" type="checkbox"/> No		
g. TOTAL	\$ 70,741 ⁰⁰			
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.				
a. Authorized Representative				
Prefix Mr.	First Name Joseph		Middle Name A.	
Last Name Curtatone		Suffix		
b. Title Mayor		c. Telephone Number (give area code) 617 625 6600		
d. Signature of Authorized Representative		e. Date Signed		

INSTRUCTIONS FOR THE SF-424

Public reporting burden for this collection of information is estimated to average 45 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0043), Washington, DC 20503.

PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.

This is a standard form used by applicants as a required face sheet for pre-applications and applications submitted for Federal assistance. It will be used by Federal agencies to obtain applicant certification that States which have established a review and comment procedure in response to Executive Order 12372 and have selected the program to be included in their process, have been given an opportunity to review the applicant's submission.

Item:	Entry:	Item:	Entry:																
1.	Select Type of Submission.	11.	Enter a brief descriptive title of the project. If more than one program is involved, you should append an explanation on a separate sheet. If appropriate (e.g., construction or real property projects), attach a map showing project location. For preapplications, use a separate sheet to provide a summary description of this project.																
2.	Date application submitted to Federal agency (or State if applicable) and applicant's control number (if applicable).	12.	List only the largest political entities affected (e.g., State, counties, cities).																
3.	State use only (if applicable).	13.	Enter the proposed start date and end date of the project.																
4.	Enter Date Received by Federal Agency Federal identifier number: If this application is a continuation or revision to an existing award, enter the present Federal Identifier number. If for a new project, leave blank.	14.	List the applicant's Congressional District and any District(s) affected by the program or project																
5.	Enter legal name of applicant, name of primary organizational unit (including division, if applicable), which will undertake the assistance activity, enter the organization's DUNS number (received from Dun and Bradstreet), enter the complete address of the applicant (including country), and name, telephone number, e-mail and fax of the person to contact on matters related to this application.	15.	Amount requested or to be contributed during the first funding/budget period by each contributor. Value of in kind contributions should be included on appropriate lines as applicable. If the action will result in a dollar change to an existing award, indicate only the amount of the change. For decreases, enclose the amounts in parentheses. If both basic and supplemental amounts are included, show breakdown on an attached sheet. For multiple program funding, use totals and show breakdown using same categories as item 15.																
6.	Enter Employer Identification Number (EIN) as assigned by the Internal Revenue Service.	16.	Applicants should contact the State Single Point of Contact (SPOC) for Federal Executive Order 12372 to determine whether the application is subject to the State intergovernmental review process.																
7.	Select the appropriate letter in the space provided. <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">A. State</td> <td style="width: 50%;">I. State Controlled Institution of Higher Learning</td> </tr> <tr> <td>B. County</td> <td>J. Private University</td> </tr> <tr> <td>C. Municipal</td> <td>K. Indian Tribe</td> </tr> <tr> <td>D. Township</td> <td>L. Individual</td> </tr> <tr> <td>E. Interstate</td> <td>M. Profit Organization</td> </tr> <tr> <td>F. Intermunicipal</td> <td>N. Other (Specify)</td> </tr> <tr> <td>G. Special District</td> <td>O. Not for Profit Organization</td> </tr> <tr> <td>H. Independent School District</td> <td></td> </tr> </table>	A. State	I. State Controlled Institution of Higher Learning	B. County	J. Private University	C. Municipal	K. Indian Tribe	D. Township	L. Individual	E. Interstate	M. Profit Organization	F. Intermunicipal	N. Other (Specify)	G. Special District	O. Not for Profit Organization	H. Independent School District		17.	This question applies to the applicant organization, not the person who signs as the authorized representative. Categories of debt include delinquent audit disallowances, loans and taxes.
A. State	I. State Controlled Institution of Higher Learning																		
B. County	J. Private University																		
C. Municipal	K. Indian Tribe																		
D. Township	L. Individual																		
E. Interstate	M. Profit Organization																		
F. Intermunicipal	N. Other (Specify)																		
G. Special District	O. Not for Profit Organization																		
H. Independent School District																			
8.	Select the type from the following list: <ul style="list-style-type: none"> • "New" means a new assistance award. • "Continuation" means an extension for an additional funding/budget period for a project with a projected completion date. • "Revision" means any change in the Federal Government's financial obligation or contingent liability from an existing obligation. If a revision enter the appropriate letter: <table style="width: 100%; border: none;"> <tr> <td style="width: 50%;">A. Increase Award</td> <td style="width: 50%;">B. Decrease Award</td> </tr> <tr> <td>C. Increase Duration</td> <td>D. Decrease Duration</td> </tr> </table> 	A. Increase Award	B. Decrease Award	C. Increase Duration	D. Decrease Duration	18.	To be signed by the authorized representative of the applicant. A copy of the governing body's authorization for you to sign this application as official representative must be on file in the applicant's office. (Certain Federal agencies may require that this authorization be submitted as part of the application.)												
A. Increase Award	B. Decrease Award																		
C. Increase Duration	D. Decrease Duration																		
9.	Name of Federal agency from which assistance is being requested with this application.																		
10.	Use the Catalog of Federal Domestic Assistance number and title of the program under which assistance is requested.																		

CERTIFICATIONS

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

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

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

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

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

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

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

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

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

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

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

Signature/Authorized Official

Date

Title

Specific CDBG Certifications

The Entitlement Community certifies that:

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

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

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

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

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

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

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

Excessive Force -- It has adopted and is enforcing:

1. A policy prohibiting the use of excessive force by law enforcement agencies within its

jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically barring entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction;

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

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

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

Signature/Authorized Official

Date

Title

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

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

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

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

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

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

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

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

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

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Signature/Authorized Official

Date

Title

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

Check if there are workplaces on file that are not identified here.

This information with regard to the drug-free workplace is required by 24 CFR part 21.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).