

## 2013 Action Plan

### I. ONE YEAR GOALS AND ACTION STEPS FOR REDUCING AND ENDING HOMELESSNESS (24 CFR section 91.220 (i)(1) regulations for Consolidated Plan/Annual Action Plans):

The following are York County's one-year goals and specific action steps for reducing and ending homelessness through:

1. *Reaching out to homeless persons (especially unsheltered persons) and addressing their individual needs through the following three action steps:*
  - a. The County will continue to fund the Community Progress Council Rental Counseling activity through the York County Community Development Block Grant (CDBG) Program. This activity provides case management to persons at risk of homelessness and others who are experiencing difficulty maintaining or obtaining affordable rental housing.
  - b. The County will continue to fund the Bell Socialization Services Emergency Shelter Staff expenses through the York County CDBG Program, which includes staff providing case management services to residents of the Bell Socialization Emergency Family Shelter.
  - c. The County will propose to the York County/York City Continuum of Care (CoC) Committee to continue the availability of funding for operating expenses for family, men, and domestic violence Emergency Shelters through the 2013 & 2014 York County Emergency Solutions Grant (H-ESG) program. In the past, the operating expenses have included office expenses for case management services to residents of the emergency shelters.
2. *Address the emergency shelter and transitional housing needs of homeless persons through the following action step:*
  - a. The County will propose to the York County/York City CoC Committee to continue the availability of funding for operating expenses for existing Emergency Shelter and Transitional Housing through the York County H-ESG program.
3. *Help homeless persons make the transition to permanent housing and independent living through the following action steps:*
  - a. The County will continue to support public and non-profit agencies in utilizing programs that assist homeless persons to make the transition to permanent housing and independent living through maintaining existing supportive services, supportive housing, and affordable housing units.
  - b. The County will continue to provide technical assistance and staff support to the York County/York City CoC Committee sub-committee in the preparation and implementation of the "10 Year Plan to End Homelessness" including goals and objectives that lead to coordinated strategies for shortening the period of time that individuals and families experience homelessness, facilitating access to affordable housing units, and preventing those who were recently homeless from becoming homeless again

4. *Help low-income individuals and families avoid becoming homeless through the following action steps:*
  - a. The County will propose to the York County/York City CoC Committee to continue the availability of funding for Rental Assistance for persons at-risk-of homelessness through the York County H-ESG program,
  - b. The County will continue to provide technical assistance and staff support to the York County/York City CoC Committee sub-committee in the preparation and implementation of the “10 Year Plan to End Homelessness” including goals and objectives that lead to coordinated homeless prevention strategies including those specific to persons being discharged from publicly funded institutions and systems of care or receiving assistance from public and private agencies that address housing, health, social services, employment, education, or youth needs.

II. ACTION STEPS TO ADDRESS HOUSING AND SUPPORTIVE SERVICE NEEDS OF PERSONS NOT HOMELESS, BUT WITH SPECIAL NEEDS, AS IDENTIFIED IN YORK COUNTY CONSOLIDATED PLAN (*section 91.220 (i)(2) regulations for Consolidated Plan/Annual Action Plans*):

The following are York County’s action steps to address housing and supportive services needs of persons not homeless, but with special needs, as identified in the York County Consolidated Plan.

1. The County will continue to provide technical assistance and staff support to the York County/York City CoC Committee subcommittee for the preparation of the “10 Year Plan to End Homelessness” to identify persons not homeless, but with special needs, and develop goals and objectives that lead to coordinated housing and supportive services.
2. The County will continue to support public and non-profit agencies in utilizing programs that assist persons not homeless, but with special needs, through maintaining existing supportive services, supportive housing, and affordable housing units and providing additional services and housing opportunities.

## 2013 Written Standards for Providing ESG Assistance

### Overview and Purpose of the Written Standards

In accordance with 24 CFR 91.220(l)(4)(i) and 567.400(e)(1), The County of York has developed the following written standards for the provision and prioritization of Emergency Solutions Grant (ESG) funding.

The County of York is awarded ESG funds annually from the Department of Housing and Urban Development as part of the Annual Action Plan Process. These funds are designed to identify sheltered and unsheltered homeless persons, as well as those at risk of homelessness, and provide the services necessary to help those persons quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, including major revisions to the Emergency Shelter Grants program, now the Emergency Solutions Grants (ESG) program. The HEARTH Act incorporated many of the lessons learned from the implementation of the Homelessness Prevention and Rapid Re-Housing Recovery Act Program (HPRP) into the new ESG program, including placing a stronger emphasis on homelessness prevention and rapid re-housing assistance.

While still an eligible cost-type under these funds, the new ESG places less emphasis on providing shelter operating costs or essential shelter services to subrecipients. In line with HUD's national homelessness policy as outlined in *Opening Doors: Federal Strategic Plan to Prevent and End Homelessness*, federal programs aimed at ending homelessness have shifted away from providing shelter support and are now geared towards providing stable, permanent housing opportunities for the homeless and at-risk homeless.

The County of York's 10-Year Plan to End Homelessness, projected to be adopted mid-year 2013, was unavailable as a guide in developing these standards. However, members of the CoC planning committee provided input. When completed, the County's 10-Year Plan will provide a broad roadmap to assess the current system of "managing" homelessness and explore the new, more innovative and cost effective "prevention" and "housing first" approaches that are greatly reducing and/or eliminating homelessness in the community.

The new ESG program allows the County of York to set priorities based on the individualized needs of the community. These standards serve to outline the specific guidelines and priorities that will be used by the County of York in awarding and administering ESG funding.

For 2013, eligible program components under the County of York's H-ESG program will be "Emergency Shelter" and "Homelessness Prevention." Applications for projects in other components will not be considered at this time. Eligible components may be revised in following years.

**A) Standard Policies and Procedures for Evaluating Individuals' and Families' Eligibility for Assistance under H-ESG:**

Eligible individuals must meet the following conditions:

- 1) The individual or family must reside within the County of York, in a homeless shelter within the County, or be relocated from an outside shelter to the County of York.
- 2) Program participants must meet the definition of homeless or at-risk homeless as spelled out in 24 CFR 576.2.
- 3) Income guidelines: as noted in the definitions referenced above, clients who are at-risk of homelessness must have an income **at or below 30% of the area median income** to qualify for ESG assistance. Income for clients who are literally homeless must also be documented in case files and must also be at or below 30% of the area medium income to qualify for this assistance.
- 4) An individual or family must have at least an initial consultation with a case manager or other authorized representative who can determine the appropriate type of assistance to meet their needs. At this initial consultation, long-term strategies for ensuring stable housing should be covered with the client. HUD encourages ineligible persons be referred to appropriate resources or service providers that can assist them.
- 5) HMIS participation is a mandatory ESG requirement. All clients receiving ESG assistance must be reported in an approved HMIS system.
- 6) All clients receiving ESG assistance must be re-certified as eligible **every three months**. ESG clients receiving more than three months of assistance must have documentation of re-certification of their eligibility for assistance included in their case file.

**B) Standards for Targeting and Providing Essential Services Related to Street Outreach**

Street Outreach is not a funded component under the County of York's 2013 H-ESG program.

**C) Policies and Procedures for Admission, Diversion, Referral, and Discharge by Emergency Shelters Assisted Under ESG, Including Standards Regarding Length of Stay, if any, and Safeguards to Meet the Safety and Shelter Needs of Special Populations, e.g., Victims of Domestic Violence, Dating Violence, Sexual Assault, and Stalking; and Individuals and Families who Have the Highest Barriers to Housing and Are Likely to be Homeless the Longest**

Policies and procedures for the admission, diversion, referral, and discharge of individuals in emergency shelters assisted under ESG shall be in accordance with established standards in place in subrecipient emergency shelters for all shelter residents. Safety and shelter needs of special populations shall be in accordance with established standards in place in subrecipient emergency shelters for these populations. However, in no case shall a child under the age of 18

be used as a basis for denying any family's admission into an emergency shelter that uses ESG funding.

**D) Policies and Procedures for Assessing, Prioritizing, and Reassessing Individuals' and Families' needs for Essential Services Related to Emergency Shelter**

Essential services is not a funded activity under the Emergency Shelter component of York County's 2013 H-ESG program.

**E) Policies and Procedures for Coordination among Emergency Shelter Providers, Essential Service Providers, Homelessness Prevention and Rapid Re-Housing Service Providers, Other Homelessness Assistance Providers, and Mainstream Service and Housing Providers**

In the development and continual refinement of these written standards, the County of York coordinates with homeless and at-risk homeless service providers in the following way:

Coordination with the Continuum of Care:

The York County Planning Commission (YCPC) is the Lead Entity for the York County/City Continuum of Care (CoC). With participation from YCPC staff, nonprofit organizations in the County of York that are members of the CoC are working to provide services to help increase the self-sufficiency of homeless persons and those with issues of mental illness, substance abuse, domestic violence and disabilities that are at-risk of homelessness. The CoC continues to operate a Homeless Management Information System (HMIS) and is working towards the development of a centralized assessment system.

The York County/City CoC has formed a Task Force to provide guidance for the County's ESG program design. The members of the Task Force are the voting members of the County/City CoC. To increase the level of coordination between the CoC and the County's homeless programs, ESG administrative staff from YCPC attend CoC meetings on a regular basis and consult and coordinate with Task Force members regularly both at CoC meetings and through electronic and telephone communication. Input and data from Task Force members has been incorporated into these Written Standards and is a main point of reference in formulating the prioritization standards outlined in Section C. Direct interactions with CoC service providers allows administrative staff to prioritize funding in support of the needs that are not currently being addressed by other federal, state and local funding sources.

The current York County/City CoC voting Member Organizations are:

<i>The United Way of York County</i>	<i>Bell Socialization</i>
<i>Community Progress Council</i>	<i>Healthy York Coalition</i>
<i>Wellspan Health</i>	<i>Turning Point Interfaith</i>
<i>Intermediate Unit #12</i>	<i>Lutheran Social Services</i>
<i>NAMI of York PA</i>	<i>York County Human Services Division</i>

<i>Adams-Hanover Counseling</i>	<i>York Area Housing Group</i>
<i>York Housing Authority</i>	<i>Hanover Council of Churches</i>
<i>YWCA of York</i>	<i>YMCA of York</i>
<i>The Salvation Army</i>	<i>York JCC</i>
<i>Office of PA House Representative Eugene DePasquale – 95<sup>th</sup> Legislative District</i>	

**F) Policies and Procedures for Determining and Prioritizing which Eligible Families and Individuals will Receive Homelessness Prevention Assistance and which Eligible Families and Individuals will Receive Rapid Re-Housing Assistance**

The resources available to address the needs of homeless and at-risk homeless populations are currently in flux. Federal, state and local programs aimed at assisting these vulnerable populations have recently undergone major changes and are expected to continue to fluctuate in the near future.

In 2012, the 10-Year Planning and HMIS subcommittees of the CoC developed strategies for H-ESG based on the most effective aspects of the HUD-funded Homelessness Prevention and Rapid Re-Housing Program (HPRP). The CoC determined that homelessness prevention through tenant-based rental assistance with case management was the primary HPRP program in need of continuation. Service providers within York County also indicated that HPRP—and in particular, rental assistance for homelessness prevention—was a cost-effective use of limited funds. The use of homelessness prevention funds helped clients maintain housing and avoid becoming needful of other homeless services.

While HUD encourages communities to emphasize rapid re-housing of homeless individuals, the CoC and service providers felt that such an emphasis would be misdirected in York County. Given the limited amount of funding, cost effectiveness is the highest priority. Because of this, Homelessness Prevention is an eligible program component under the County’s H-ESG program, while Rapid Re-housing is not.

The County of York has a strong network of providers working with homeless and at-risk homeless populations in the city. Service providers within the County are experienced with the tenant-based rental assistance requirements under HPRP, and are familiar with the program’s policy, funding, and intake requirements. The chosen focus on homelessness prevention will permit the County to maximize the knowledge and organizational infrastructure that service providers gained under HPRP.

In determining which individuals or families should receive priority for tenant-based rental assistance, several areas were identified as a result of coordination with the CoC’s Task Force and feedback from HPRP subrecipients. This feedback indicated that the following populations should be given priority for rental assistance funding under the new ESG program:

1. Families with children should be prioritized to the maximum extent possible.

2. Due to the limited amount of funding available, all other requests for rental assistance shall be treated as first-come, first-served among eligible participants.

Moving forward, YCPC staff will continue to work with the CoC's Task Force and service providers to ensure that the ESG program remains effective at addressing the changing needs of the community.

**G) Standards for Determining the Share of Rent and Utilities Costs that Each Program Participant Must Pay, if any,**

Emergency Shelter Component

Shelter residents do not receive direct financial assistance under this component.

Homelessness Prevention Component

The H-ESG program's "Homelessness Prevention" component includes provision of tenant-based rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the *Homeless* definition given in 24 CFR 576.2. Currently, tenant-based rental assistance is available only as a one-time rent payment of \$1,000 for families and \$750 for individuals. Therefore, each participant must pay any portion of rent that exceeds the payment limit, and the full share of any utilities.

The County of York does not mandate that clients receiving ESG assistance pay a specific portion of their total rent with other sources. However, limits are placed on the amount of funds that will be made available for direct financial assistance provided through this program, as noted above.

**H) Standards for Determining How Long a Particular Program Participant will be provided with Financial Assistance and whether and How the Amount of that Assistance will be Adjusted Over Time**

Emergency Shelter Component

Shelter residents do not receive direct financial assistance under this component. Funds under the "Emergency Shelter" component of the H-ESG program are limited to nonprofit organizations operating existing shelters located within York County who serve individuals and families meeting the definition of homeless. Spending on emergency shelter operations shall not comprise more than 60% of the total H-ESG funding allocated to the County annually.

Homelessness Prevention Component

The H-ESG program's "Homelessness Prevention" component includes provision of tenant-based rental assistance and case management necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the *Homeless* definition given in 24 CFR 576.2. Currently, tenant-based rental assistance is available only as a one-time rent payment of \$1,000 for families and \$750 for individuals. Case management consists of an initial evaluation for eligibility and needs, and where appropriate, referral to

supportive services. Case management also includes to development of a plan to assist the program recipient to retain permanent housing after ESG assistance ends. Therefore, financial assistance is not extended beyond the initial payment and consultation and the amount of assistance is not adjusted over time.

All clients receiving direct financial assistance must provide their case manager with a copy of their lease or rental agreement to be kept on file. Rent Reasonableness and Housing Habitability Standard screenings must be conducted *prior* to providing direct financial assistance, must be documented in the case file, and are the responsibility of the subrecipient. ESG funds used to pay direct assistance must be issued to a third party, namely an owner that has entered into a rental agreement with the subrecipient non-profit organization. Rental assistance will not be provided to individuals receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.

**I) Standards for Determining the Type, Amount, and Duration of Housing Stabilization and/or Housing Relocation Services to Provide a Program Participant**

Emergency Shelter Component

Shelter residents do not receive direct financial assistance under this component.

Homelessness Prevention Component

The H-ESG program's "Homelessness Prevention" component includes provision of rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the *Homeless* definition given in 24 CFR 576.2.

The County of York, through consultation with the CoC, has determined that tenant-based rental assistance to prevent homelessness is to be the single homelessness prevention activity funded under the ESG program. Housing relocation and stabilization services are limited to case management for clients receiving rental assistance that consists of an initial evaluation for eligibility and needs, and where appropriate, referral to supportive services. Case management also includes to development of a plan to assist the program recipient to retain permanent housing after ESG assistance ends.

**J) Standards for All Other H-ESG Program Policies and Procedures**

All program standards, policies, and procedures not specifically discussed in Sections A-J above will be conducted in accordance with requirements as put forth in 24 CFR Part 576 – "Emergency Solutions Grant Program."