

Checklist of Requirements for the Homelessness Portions of Consolidated Plan Annual Action Plan

A. BACKGROUND INFORMATION AND GENERAL GUIDANCE

The annual action plan provides a yearly update of jurisdictions' proposed action steps and priorities for the next program year. The recent changes to the consolidated plan regulations introduce a number of new required elements for the annual action plan that are relevant to reducing and ending homelessness. The textbox below contains a brief outline of the complete annual action plan with the expanded homelessness-related sections, which are the main focus of this checklist, in bold.

<u>Action Plan Outline</u>	
a)	SF-424
b)	Executive Summary
	1) Objectives & Outcomes
	2) Evaluation of Past Performance
	3) Summary of Citizen Participation & Consultation Process
	4) Summary of Comments or Views
	5) Summary of Comments or Views Not Accepted & Reasons Therefore
c)	Resources and Objectives
	1) Federal Resources
	2) Other Resources
	3) Annual Objectives
d)	Activities to be Undertaken
e)	Outcome Measures
f)	Geographic Distribution
g)	Affordable Housing One-Year Goals
h)	Public Housing
i)	Homeless & Other Special Needs Activities
	1) One-Year Goals & Action Steps
	i. Outreach
	ii. Emergency Shelter & Transitional Housing Needs
	iii. Transition to Permanent Housing & Independent Living
	iv. Prevention Among Individuals & Families:
	A. Being Discharged from Publicly-funded Institutions
	B. Receiving Assistance from Public & Private Agencies
	2) Activities Addressing Housing & Supportive Service Needs of Persons with Special Needs
j)	Barriers to Affordable Housing
k)	Other Actions
l)	Program Specific Requirements for ESG
	1) Written Standards
	2) Description of CoC
	3) Process for Making Subawards
	4) Homeless Participation Requirement
	5) Performance Standards
	6) Consultation with CoC

Some of these new requirements, such as the one-year goals and action steps for reducing and ending homelessness [*§91.220(i) for local governments and §91.320(h) for states*] apply to ALL formula grant programs covered by the consolidated plan, regardless of whether or not they receive an ESG allocation. Other new program-specific requirements [*§91.220(l)(4) for local governments and §91.320(k)(3) for states*], such as written standards, performance standards, and Continuum of Care (CoC) consultation, apply only to recipients that receive ESG allocations. The following checklist can assist recipients in drafting an accurate and complete submission in accordance with the requirements of 24 CFR part 91, as amended by the Emergency Solutions Grants (ESG) program interim rule. **Please note that only the elements of the annual action plan specifically related to homelessness planning and ESG are included in this checklist.** It does not cover the general requirements of the annual action plan (such as budget or match) or any requirements specific to CPD programs other than ESG (such as CDBG, HOME or HOPWA). Although not reviewed in detail here, ESG recipients should be aware that new certifications have been developed for ESG and must also be submitted as part of the annual action plan. Recipients can access the new certifications at:

- <http://www.hud.gov/offices/cpd/about/conplan/pdf/conplancertifications.pdf> (Certifications for **non-state** recipients); or
- <http://www.hud.gov/offices/cpd/about/conplan/pdf/conplanstatecertifications.pdf> (Certifications for **state** recipients).

Recipients must follow all **consultation** (*§91.100 (local governments), §91.110 (states)*) and **citizen participation** (*§91.105 (local governments), §91.115 (states)*) requirements when completing their annual action plan. The revised consolidated plan regulations explicitly require **coordination and collaboration** between ESG recipients and the CoC and other key stakeholders in order to foster a comprehensive, community-wide planning process that ensures the seamless coordination of services and funding streams. Additional information is available for state recipients regarding the expanded consultation requirements at: <http://www.hudhre.info/index.cfm?do=viewResource&ResourceID=4692>.

Recipients should also note that as of November 15, 2012, all recipients must complete their consolidated plan in IDIS using the consolidated plan template. Recipients may create a stand-alone annual action plan using the template; however, use of the action plan template is optional until the recipient's consolidated plan is submitted in IDIS. This outline can be used as an overview of the information related to homelessness that will be required in the action plan template. For more information on the full annual action plan as well as instructions for entering the annual action plan in IDIS, please visit www.onecpd.info.

B. CHECKLIST OF REQUIRED ELEMENTS APPLICABLE TO ALL FORMULA GRANT PROGRAMS COVERED BY THE CONSOLIDATED PLAN

Homeless and Other Special Needs Activities (*§91.220(i), §91.320(h)*)

- 1) The jurisdiction must describe its **one-year goals and specific action steps** for reducing and ending homelessness through:
 - ☐ **Reaching out** to homeless persons (especially unsheltered persons) and assessing their individual needs;

- Addressing the **emergency shelter and transitional housing needs** of homeless persons; and
 - Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the **transition to permanent housing and independent living**, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were recently homeless from becoming homeless again; and
 - Helping low-income individuals and families **avoid becoming homeless**, especially extremely low-income individuals and families who are:
 - A. **Being discharged from publicly funded institutions and systems of care**, such as healthcare facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions;
 - B. **Receiving assistance from public and private agencies** that address housing, health, social services, employment, education, or youth needs.
- 2) The jurisdiction must specify the activities that it plans to undertake during the next year to **address the housing and supportive service needs** identified in accordance with §91.215(e) with respect to **persons who are not homeless but have other special needs**.

C. CHECKLIST OF REQUIRED ELEMENTS APPLICABLE ONLY TO ESG RECIPIENTS

1) **Written Standards**

The jurisdiction must include its **written standards for providing ESG assistance**. The minimum requirements regarding these standards are set forth in 24 CFR 576.400(e)(1) and (e)(3) (§91.220(l)(4)(i), §91.320(k)(3)(i)).

- a) If the recipient is a **metropolitan city, urban county, or territory**, the recipient must have written standards for providing ESG assistance and must consistently apply those standards in its consolidated plan.
- b) If the recipient is a **state**:
 - i. The recipient must establish and consistently apply, or require that its subrecipients establish and consistently apply, written standards for providing ESG assistance. If the written standards are established by the subrecipients, the recipient may require these written standards to be:
 - A. Established for each area covered by a CoC or area over which the services are coordinated and followed by each subrecipient providing assistance in that area; or

- B. Established by each subrecipient and applied consistently within the subrecipient's program.
- ii. Written standards developed by the state must be included in the state's consolidated plan. If the written standards are developed by its subrecipients, the recipient must describe its requirements or the establishment and implementation of these standards in the state's consolidated plan.
- c) At a minimum, these **written standards must include:**
- ☐ Standard policies and procedures for **evaluating individuals' and families' eligibility** for assistance under ESG;
 - ☐ Standards for **targeting and providing essential services related to street outreach**;
 - ☐ 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 **assessing, prioritizing, and reassessing individuals' and families' needs** for essential services related to emergency shelter;
 - ☐ Policies and procedures for **coordination** among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers (see §576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);
 - ☐ 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**;
 - ☐ Standards for **determining what percentage or amount of rent and utilities costs** each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
 - ☐ 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; and
 - ☐ 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 may receive assistance; or the maximum number of times the program participant may receive assistance.

2) **Description of CoC** (§91.220(l)(4)(ii), §91.320(k)(3)(ii))

- ☐ If the CoC for the jurisdiction's area has established a centralized or coordinated assessment system that meets HUD requirements, the jurisdiction must describe that centralized or coordinated assessment system. The requirements for using a centralized or coordinated assessment system, including the exception for victim service providers, are set forth under §576.400(d).

3) **Process for Making Sub-awards** (§91.220(l)(4)(iii), §91.320(k)(3)(iii))

- ☐ The jurisdiction must identify its process for making subawards and a description of how the jurisdiction intends to make its allocation available to private nonprofit organizations (including community and faith-based organizations), and in the case of urban counties, funding to participating units of local government.

4) **Homeless Participation Requirement** (§91.220(1)(4)(iv) – *not applicable to states*)

- ☐ If the jurisdiction is unable to meet the homeless participation requirement in §570.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering and making policies and decisions regarding any facilities or services that receive funding under ESG.

5) **Performance Standards** (§91.220(1)(4)(vi), §91.320(k)(3)(v))

- ☐ The jurisdiction must describe the performance standards for evaluating ESG activities.

6) **Consultation with CoC** (§91.220(1)(4)(vi), §91.320(k)(3)(v))

The jurisdiction must describe its consultation with each CoC that serves the jurisdiction in:

- ☐ Determining how to allocate ESG funds for each program year;

Note: Rather than describing the process for allocating ESG funds (as required at (§91.220(l)(4)(iii), §91.320(k)(3)(iii) – see section 3) above), recipients should provide a summary of the consultation process for deciding how to allocate ESG funds.

- ☐ Developing the performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds; and

Note: Rather than describing the performance standards (as required at (§91.220(1)(4)(vi), §91.320(k)(3)(v)) – see section 5) above), recipients should provide a summary of the consultation process for developing performance standards for and evaluating the outcomes of ESG-funded projects and activities.

- Developing funding, policies, and procedures for the administration and operation of the Homeless Management Information System (HMIS).

Note: Recipients should provide a summary of the consultation process for developing funding, policies, and procedures for the administration and operation of the HMIS.

D. OPTIONAL COMPONENT

Requirements for recipients who plan to use the risk factor under paragraph (1)(iii)(G) of the “at risk of homelessness” definition (§576.2(1)(iii)(G))

- If the recipient plans to serve persons “at risk of homelessness,” based on the risk factor “otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness,” describe the specific characteristics associated with instability and increased risk of homelessness.

ADDITIONAL RESOURCES

Using IDIS to Prepare the Consolidated Plan, Annual Action Plan, and CAPER/PER -
http://www.hud.gov/offices/cpd/about/conplan/pdf/conplan_manual.pdf

Emergency Solutions Grants (ESG) Program and Consolidated Plan Conforming Amendments -
http://www.hudhre.info/documents/HEARTH_ESGInterimRule&ConPlanConformingAmendments.pdf