State of Connecticut

Substantial Amendment to the FFY 2011 Annual Action Plan for Housing and Community Development for the Emergency Solutions Grants (ESG) Program

submitted to the

U.S. Department of Housing and Urban Development

by the
State of Connecticut
Departments of Social Services and Economic and Community Development

May 15, 2012

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Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

A. Requirements for Preparation

1. Consultation. Consult with the Continuum(s) of Care within the geographic area on: determining how to allocate ESG funds for eligible activities; developing the performance standards for activities funded under ESG; and developing funding, policies and procedures for the operation and administration of the HMIS.

The State of Connecticut is directly responsible for the administration of the CT Balance of State Continuum of Care, and does so through the CT Balance of State Continuum of Care (CT-505) Steering Committee. This committee is made up of representatives of the local sub-continua as well as relevant state agencies.

The Department of Social Services (DSS) and Department of Economic and Community Development (DECD) are active members of the CT Balance of State Continuum of Care (CT-505) Steering Committee. CT Balance of State CoC Steering Committee meets bi-monthly and has done so for more than fifteen years. DSS is also an active member of the Balance of State CoC HMIS Sub Committee, which meets quarterly. The three (3) points noted above are all within the realm of active CoC participation.

2. Citizen Participation. Follow existing citizen participation plan for completing a substantial amendment.

The Department of Social Services (DSS) and Department of Economic and Community Development (DECD) followed the citizen participation plan process as contained in the State of Connecticut 2010-2015 Consolidated Plan for Housing and Community Development (ConPlan).
http://www.ct.gov/ecd/lib/ecd/housing_plans/2010-15_cp_-_hud_approved.pdf

B. Required Contents of Substantial Amendments

1. SF-424 – included in Attachments Section of this document

2. Summary of Consultation Process. Describe how the recipient consulted with the Continuum(s) of Care on: determining how to allocate ESG funds for activities; developing the performance standards for activities funded under ESG; and developing funding, policies, and procedures for the operation and administration of the HMIS.

The Department of Social Services (DSS) and Department of Economic and Community Development (DECD) are active members of the CT Balance of State Continuum of Care (CT-505) Steering Committee. CT Balance of State CoC Steering Committee meets bi-monthly. During the March 15, 2012 meeting, DSS shared with attendees the proposal for Emergency Solution Grant Allocation #2. This process was conducted to seek input and address any concerns that might identify gaps or deficiencies in the proposed service(s). Based upon existing resources and ESG requirements, member agencies supported the proposed concept, as it would directly assist homeless households. Members were notified of the public hearings and comment periods to be held for the ESG substantial amendment, and encouraged to attend. ESG municipalities' residents will not be able to access these monies, as their municipality received its own ESG

#2 Allocation. The one caveat, since a number of homeless households are located in ESG municipalities would be if the ESG municipalities are targeting their resources for a purpose not covered by the Balance of State ESG allocation #2. During the Comment Period, DSS received a comment concerning ESG municipalities and their constituents' ability to utilize Balance of State ESG rapid rehousing financial assistance. DSS will develop a process that will require ESG municipalities to demonstrate that they incurred/expended resources or identify barriers that preclude them from providing rapid rehousing financial assistance services to their constituents.

The Balance of State CoC just completed the CoC Check-up process. In fact, DSS completed the ESG/HPRP Grantee(s) self-assessment for the CoC Check-up process. The CoC Action Plan template, located on HUD's Homelessness Resource Exchange states, "*It is recommended that the CoC Action Plan, at a minimum, identify the goals, related strategies and action steps for each goal, responsible party, timeframe, whether technical assistance is needed, and relevance to CoC capacity areas (per Check-up domains/elements/indicators), Federal Strategic Plan goals and HEARTH Act performance measures.*" DSS and DECD will continue to be active participants as the Balance of State Continuum of Care develops its Action Plan, which includes developing performance standards for activities funded under ESG. Where possible, DSS will also coordinate with ESG municipalities and thus their Continua of Cares to ensure common ESG requirements and centralized intake, where applicable can be realized.

DSS is an active member of the Balance of State CoC HMIS/PIT Sub Committee. In fact, based upon concerns identified during the 2012 PIT Count and preparation for the submission of the Annual Homeless Assessment Report (AHAR), it became apparent that the Balance of State CoC agencies needed additional HMIS support above and beyond the limited resources currently allocated through the existing CoC HUD grant. Also based upon HEARTH and ESG, the Balance of State CoC HMIS/PIT Sub Committee will charge lead agency with reviewing policies & procedures for the operation and administration of HMIS to ensure compliance and the DSS will continue to be an active participant in the process. The DSS is also exploring the feasibility of linking data quality compliance to contractual compliance.

3. Summary of Citizen Participation Process. Summarize citizen participation process used, summarize the public comments or views received; and summarize the comments or views not accepted and included the reasons for not accepting those comments.

Summary of Citizen Participation Process

Consistent with the approved Citizen Participation Plan in the CT. ConPlan, DECD held one public hearing to elicit input into the development of the draft Substantial Amendment to the 2011-2012 Action Plan for Housing and Community Development: in Coventry on April 10, 2012. The public was also encouraged to submit written comments. On March 22, 2012, a legal notice announcing the public hearing and requesting public comments was published in two newspapers including one in Spanish. The

legal notice and copies of past Action Plans, ConPlans and CAPERs were also available on the DECD website.

Consistent with the approved Citizen Participation Plan in the CT. ConPlan, on April 13, 2012, DECD began the 30-day public comment period on the draft Substantial Amendment to the 2011-2012 Action Plan. The public comment period concluded on May 13, 2012. DECD held one additional public hearing: in Hartford on May 1, 2012. On April 12, 2012, a legal notice announcing the public comment period and the public hearing was published in two newspapers including one in Spanish. The legal notice and a copy of the draft Substantial Amendment to the 2011-2012 Action Plan were posted on the DECD website. Copies of past Action Plans, ConPlans and CAPERs were also available on the DECD website.

The municipal chief elected officials of all 169 municipalities in the state received Department Notices informing them of the public hearings and comment periods as well as copies of the legal notices. Copies of the legal notices were forwarded to the Regional Planning Organizations and they were asked to post them to their web sites. DECD also forwarded copies of the legal notices to its Community Partners.

Outline of Activity for Public Hearings/Public Comment

- April 10, 2012, Public Hearing: Two persons attended the Public Hearing. No comments were received. A copy of the legal notices and transcript is included in the Attachments Section of this document.

- Written Comments received during the development of the draft Substantial Amendment to the 2011-2012 Action Plan: No comments were received.

- May 1, 2012, Public Hearing: One person attended the Public Hearing. No comments were received. A copy of the legal notices and transcript is included in the Attachments Section of this document.

- Written Comments received during the 30 day Public Comment Period on the draft Substantial Amendment to the 2011-2012 Action Plan: Two entities provided comments. Copies of the Comments are included in the Attachments Section of this document.

Summary of Public Comments or views received and responses

Comments received during the 30 day Public Comment Period on the draft Substantial Amendment to the 2011-2012 Action Plan.

From: Rick Earle, Concerned citizen outside of a municipality
Date: May 5, 2012

Comment:
1. If an ESG municipality opts out of offering Rapid Rehousing financial assistance to their constituents, how will this affect the amount of available financial assistance funds to the towns and shelters that do not receive ESG municipality funding?

DSS Response:
An ESG municipality should be offering some type of rapid rehousing activity to their constituents as urged by the Secretary of the Federal Department of Housing and Urban Development (HUD). If there is a barrier to providing rapid rehousing activities by the ESG municipality, the ESG municipality **must** approach the state ESG program to discuss that barrier and work on a plan so the constituents of that municipality have the opportunity to be rapidly rehoused out of emergency shelter. Once rapid rehousing funds have been committed and/or expended in the ESG municipality, the State of Connecticut will review the expenditures and work with the municipality on a transition plan so the state ESG funds will service the constituents in that municipality as long as there are still state ESG funds available. Also, if a ESG municipality demonstrates barriers to providing rapid rehousing to its constituents, the State of Connecticut will seek HUD's approval to utilize Balance of State resources to assist constituents in that ESG municipality. Once the state ESG funds are covering a municipality in addition to the rest of the state, the ESG funds will have to stretch more to rapidly rehouse more people out of shelter.

Accepted/Not Accepted/Reason:
A change was made to the ESG Substantial Amendment in response to this question. Please refer to the last four sentences of the first paragraph under B.2. Summary of Consultation Process.

Comment:
2. If an ESG municipality opts out of offering Rapid Rehousing financial assistance to their constituents, will there be any priority given to emergency shelters and homeless populations outside of those municipalities to ensure all of the State ESG funds do not have to cover a municipality that receives their own ESG funds but decides not to rapidly rehouse?

DSS Response:
There will be no priority given to the shelters outside of the municipalities if the ESG municipality does not offer rapid rehousing financial assistance. It is important that all shelters are afforded the opportunity to refer homeless households to the ESG rapid rehousing financial assistance program so they can transition out of homelessness.

Accepted/Not Accepted/Reason:
No change was made to the ESG Substantial Amendment

Comment:
3. Per this draft, State ESG funds will only cover an ESG municipality with Rapid Rehousing financial assistance in the event that the ESG municipality chooses not to offer rapid rehousing financial assistance. Does this mean that the State ESG would only provide the financial assistance and the municipality would be completing the housing stabilization for their constituents?

DSS Response:
Yes. The State ESG monies are targeted for rapid rehousing financial assistance only. Rapid Rehousing Housing Relocation and stabilization services for the State's ESG program are being leveraged through another program that

does not have the current capacity to absorb housing relocation and stabilization services from ESG municipalities without overburdening the system. Rapid Rehousing Housing Relocation and stabilization services must be completed by the ESG municipality's contracted/leveraged programs. Whichever agency in the ESG municipality that refers its constituent to the state ESG rapid rehousing financial assistance program continue to provide the household with housing stabilization once the financial assistance is given.

Accepted/Not Accepted/Reason:

No change was made to the ESG Substantial Amendment

From: Carol Walter, Executive Director Connecticut Coalition to End Homelessness (CCEH)

Date: May 10, 2012

Comment 1:

Amendment Reference:

"From the department's experience with provision of services to literally homeless populations, one thing is clear, if households with low to moderate barriers can be assisted during their 1st episode of homelessness and provided with housing stabilization supports, they are not likely to re-enter shelter within their 1st year of housing placement."

There is little evidence that Rapid Rehousing services are not effective for populations who are commonly considered as "high barriered". While it is true that more intensive service and housing models such as permanent supportive housing should be closely targeted to those with multiple barriers to independence, there are plentiful examples of rapid rehousing assistance being very effectively used in combination with mainstream services to rehouse chronically homeless individuals or families.
Moreover, we believe that assessment of barriers at application to the program should be limited to identifying those problems that may interfere in a landlord entering a lease with the client. Even then, barriers should be addressed through the services components of the program as an alternative to screening out homeless households from the program altogether.

Accepted/Not Accepted:

No change was made to the ESG Substantial Amendment

Comment 2:

Amendment Reference:
"At present, the hybrid program is entitled, "CT Housing First" which will have 2 components RR-financial assistance (ESG funds) and housing find/stabilization services (leveraged resources)."

CCEH passionately supports the housing first model and appreciates DSS and DECD's recognition that this philosophy, in broad terms, is the most effective approach for preventing and reducing homelessness. However, since the inception of the Housing First for Families Program we have received numerous comments that the term is confusing. *Housing First* is the name most commonly used to describe a model of Permanent Supportive Housing Programs targeted to long term and chronically homeless households which provides permanent subsidies and supports. To avoid confusion we suggest a different name such as the Connecticut Rapid Rehousing Program or CT-RRP.

Accepted/Not Accepted:

No change was made to the ESG Substantial Amendment

Comment 3:

While both the current Housing First for Families and Beyond Shelter CT programs are referenced at the beginning of the document as state funded programs through which households will access rapid rehousing services and financial assistance, only the Beyond Shelter CT (BSCT) program is named beginning in Section 6.a.2. Clarification is recommended as to the role of the existing Housing First for Families Program as it is our understanding that both programs will be access points for Rapid Rehousing services.

Accepted/Not Accepted:

No change was made to the ESG Substantial Amendment

Comment 4.

Amendment Reference:

"Households determined initially eligible will receive a full assessment of housing barriers and household resources. Households may be screened out at this point if 1) the household appears to have other resources/housing opportunities that it can access to become re-housed without ESG financial assistance, or 2) the household has very high or multiple barriers to re-housing and another more appropriate placement or referral can be made. Households that are deemed ineligible will continue to receive engagement services through emergency shelter case management services provided by shelter staff."

We suggest that barriers assessed should only include those which would prevent a landlord from executing a lease with the head of household as all other assessment information is subjective as to its potential impact on housing stability. We suggest that any language relating to ineligibility based upon high or multiple barriers be struck as there are no assurances that deemed ineligibility based upon such barriers complies with fair housing law or is evenly assessed.

Accepted/Not Accepted:

No change was made to the ESG Substantial Amendment

Comment 5:

Amendment Reference:

"*3) a full or partial deposit (if needed) plus a short-term rental subsidy not to exceed 50% of the rent or 50% of the household's income up to 12 months. Exceptions to this minimum rent will be made for households with no or extremely low incomes that have a credible plan to gain employment and/or benefits that are expected to start within six months and can sustain the household after the subsidy period".*

CCEH suggests that references to "sustain the household" be struck as it is entirely subjective.

Accepted/Not Accepted:

No change was made to the ESG Substantial Amendment

Comment 6:

Amendment Reference

"Reducing the number of persons entering shelter: Approximately 9.18% of those anticipated to be served with ESG funded services will be homeless upon entry. Through the review of HMIS data, CT and its sub recipients will be able to track where persons enter the program from and compare this information with Point In Time Data

collected annually."

We believe the estimate of 9.18 percent is erroneous and should be corrected. It appears that DECD/DSS plan to use funds for Rapid Rehousing only and therefore 100% of those served will be homeless. Additionally, reference to Point in Time and HMIS analysis should be clarified. Program entry will indeed be tracked through HMIS. Reduction in homelessness will be tracked with through HMIS (year-round data) and the annual Point-in-Time Count.

Accepted/Not Accepted:

No change was made to the ESG Substantial Amendment

Comment 7:

Amendment Reference:

"Shortening the time persons spend homeless: A primary goal for Connecticut is the reduction in the length of stay in homelessness. Through rapid re-housing services, it is expected to occur within 60 days of homelessness. Connecticut will also time educating the provider network concerning the feasibility of "shortening the length of stay" practices in homeless shelters. Shortening the stay in homelessness will hopefully become the new mindset and not viewed as impossible. In order to be successful, CT will have to start to develop goals and benchmarks toward achieving that goal *and contractually require sub recipients to make efforts to reach such goals and benchmarks.*"

It is our assumption that DECD/DSS intent is that rapid rehousing services and other interventions reduce the length of time that households are homeless. We respectfully point out that the reference to shortening the length of stay practices in homeless shelters can be misconstrued to suggest that individual shelter and transitional housing programs length of stay policies or limits should or can be adjusted to reduce length of homelessness***. It should be noted that length of homelessness will be assessed by CoC and not by program.*** It is our belief that individual program length of stay policies or practices are irrelevant to reducing actual length of homelessness. We suggest that references to reducing length of stay be substituted with "implement housing based services which result in quicker exit from shelter or transitional housing to housing".

Accepted/Not Accepted:

No change was made to the ESG Substantial Amendment

Comment 8:

Amendment Reference**:**

"However, we have learned from Homelessness Prevention and Rapid Re-Housing (HPRP) that the greatest barrier to housing for most clients is lack of income. Based upon this fact, CT will have to require additional performance standards to address the income barrier and at a minimum, look at income as 2 measures: (1) percentage of households leaving with employment income and (2) percentage of households entering with income and leave the program with an income. Finally, we examine data specific to households that leave homelessness, per HMIS, return to homelessness within 12 months."

While increased income is vital to ongoing housing stability we recommend that measures relating to income are not appropriate or measurable through this program as it is a housing focused intervention. Income supports and outcomes rely in factors well outside the scope and expertise of this program. We agree that service providers should be well connected to local training and employment services and that linkages to such should be a contractual expectation of service providers.

In addition, through our experience with HPRP we have learned that HMIS is a poor vehicle for tracking income changes as with most poor households income and wage variances are frequent. We suggest that income

information be gained through a data match between the HMIS and CT Department of Labor data.

Accepted/Not Accepted:

No change was made to the ESG Substantial Amendment

DSS Response:

The State of Connecticut thanks the Connecticut Coalition to End Homelessness (CCEH) for its comments and general support of our Draft Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds. Also, it is great to see that CCEH believes that the Substantial Amendment's focus and scope keeps with the spirit and intent of HEARTH and the CT Opening Doors Framework. As CCEH has been a partner in the implementation and integration of CT Beyond Shelter, Housing First for Families and Homelessness Prevention and Rapid Rehousing; the State of Connecticut will take CCEH's comments under advisement as it works to implement ESG Rapid Rehousing-Financial Assistance; as well as fine-tune existing CT Beyond Shelter Program and Housing First for Families through a procurement process into one program.

4. Match. Describe: types of cash and/or non-cash resources; specific amounts of resources used as match and proposed uses of match resources.

DSS is required to match 100% of the Second Allocation of ESG FY 2011 which equals $658,859.00. DSS will utilize state resources to match the Second Allocation of ESG FY 2011 in the amount of $658,859.00 at a minimum. The proposed use for the match resources are currently operational and dovetail nicely with the proposed usage of ESG Allocation #2. The match resources will be utilized for housing find and stabilization services for literally homeless households. In fact, the DSS's current housing find / housing stabilization system costs approximately $1,066,618.00. The DSS is currently exploring the feasibility of maximizing these resources through the creation of a new program entitled "CT Housing First".

5. Proposed Activities and Overall Budget

a. Proposed Activities.

DSS proposes 2 activities to be funded using the second allocation of funds, which are as follows: (1) Rapid Re-Housing-Rental Assistance and (2) HMIS. No reprogrammed funds from the first allocation will be utilized.

- All recipients must include the following details for each proposed activity:

(1) Corresponding priority needs from recipient's Action Plan;

Rapid Rehousing – Rental Assistance: High Priority Need. Objective 1 under "Homelessness Prevention & Supportive Services" (pg. 73) Goal – "*Enhance suitable living environment, create decent housing, and provide economic opportunities for low- and moderate income persons and address shelter, housing and service needs of the homeless, those threatened with homelessness with an emphasis on preventing homelessness*." Objective 1: "...The occurrence of homelessness is

reduced and those experiencing homelessness are quickly transitioning into permanent housing. Additionally homelessness is averted for those individuals and families in danger of becoming homeless.

Homeless Management Information System (HMIS): Objective 1 under "Homelessness Prevention & Supportive Services" (pg. 73) Goal – "*Enhance suitable living environment, create decent housing, and provide economic opportunities for low- and moderate income persons and address shelter, housing and service needs of the homeless, those threatened with homelessness with an emphasis on preventing homelessness*."

(2) Concise description of the activity, including the number and types of persons to be served;

Rapid Rehousing – Rental Assistance:
DSS shall utilize Rapid Re-Housing-Rental Assistance to target homeless individuals and families, per definitions at §91.5 and §576.2 (also know as Homeless Category 1 Criteria). Types of financial assistance that shall be available for target population are as follows: security deposit; standard utility deposit; utility payments; moving costs; short-term/medium term rental assistance and rental arrearage. All types of financial assistance will comply with HUD requirements identified in §576.104 and §576.106. DSS will leverage existing resources to provide some, but not all of the Housing relocation and stabilization services identified in §576.105. Written standards and procedures will be governed by §576.400. The number of households projected to be served annually is 244, depending upon the financial assistance offered. Based upon limited ESG Allocation #2 resources, targeting will be essential to success. Based upon experience with state funded housing stabilization resources and HPRP, targeting literally homeless households will make a definite impact on returns to shelter. Point in Time Count 2011 report provides a snap shot of homelessness in Count during a day in January is embedded in this document.

Homeless Management Information System (HMIS):

Based upon DSS's continued participation with the Balance of State Continuum of Care, the Department learned that data quality for balance of state agencies has been challenged and the existing level of resources (HUD grant) did not address the gap. The below services will assist the Balance of State CoC and DSS with compliance with HEARTH outcomes. The target population: emergency shelters located in the catchment area. Attached for your ready reference the Housing Inventory Chart for FY 2011 is embedded in this document.

Site visits –

a. On-site and remote support sessions (Agency requested); and

b. Based upon risk assessment tool, yearly HMIS policy & procedure reviews; and

AHAR Data Review and Consultation –

a. Work with agencies throughout the year to assure data quality is within accepted parameters;
b. Submit initial report to HUD/DSS for review/questions;
c. Work to resolve issues and answer questions based on initial submission; and
d. Submit final AHAR for acceptance or rejection.

(3) Corresponding standard objective and outcome categories;

Rapid Rehousing – Rental Assistance:
SL-1.1 Suitable Living Environment with Purpose of New or improved availability/accessibility
DH-1.1 Decent Housing with Purpose of new or Improved Availability/Accessibility

Homeless Management Information System (HMIS):
DH-1.1 Decent Housing with Purpose of new or Improved Availability/Accessibility

(4) Start date and completion date* and

Rapid Rehousing – Rental Assistance:

Projected procurement will be released once Substantial Amendment is approved by HUD. The DSS's procurement standards require that the process runs, at a minimum of 7 weeks from start to finish; however, based upon the circumstances, the Division of Community Services will request that it be allowed to conduct a procurement within a shorter timeframe based upon the need that exists now that Homelessness Prevention and Rapid Rehousing (HPRP) monies have been exhausted/committed. Proposed start date will be June 15, 2012 – June 30, 2013. To expedite matters, the will submit to HUD Community, Planning & Development Representative, a synopsis of the proposed procured services.

Homeless Management Information System (HMIS):

Contract for HMIS services will be finalized once HUD approvals the Substantial Amendment, as these services will be provided by the Lead HMIS agency for Connecticut, CCEH. Proposed start date will be May 15, 2012.

**It should be noted, that DSS is willing to enter into contract/procurement sooner than the identified date; however, the department is under the belief that it must first obtain HUD approval prior to incurring costs. If this is not the case, please advise.*

(5) ESG and other funding amounts

Rapid Rehousing – Rental Assistance:

ESG Allocation #2 – ($43,789.00-admin + services $540,070) = $583,859.00

Homeless Management Information System (HMIS):
ESG Allocation #2 – (5,625.00-admin + services $69,375.00) = $75,000.00

Other funding – DSS will leverage additional resources for the Housing Relocation / Stabilization Services functions. Projected costs = $963,618.00. It should be noted that these services will not be exclusive to ESG target population, but will also service households that are homeless beyond Category 1 definition.

- Local governments and territories are required, and States are encouraged, to include the following details for each proposed activity: (6) One or more performance indicators; (7) Projected accomplishments, in accordance with each indicator, to be made within one year; and (8) Projected accomplishments, in accordance with each performance indicator, to be made over the period for which the grant will be used for that activity. – See below chart.

Proposed Activity – Rapid Rehousing – Rental Assistance

Annual Action Plan Planned Project Results			
Outcomes and Objectives	Performance Indicators	Expected Number	Activity Description
SL-1.1 Suitable Living Environment with Purpose of New or improved availability/accessibility	Number of homelessness reoccurrences among DSS assisted families leaving emergency shelters	200	Based upon HMIS data, there will be fewer numbers of reoccurrences among households. Shelter data entry and BSP/HFF or a new program compliance with data entry is essential to success of this measure. Contractual language will be added to address data quality.
	Number of persons housed	150	Persons remain stably housed for at least a 12 month period.
	Number of clients that received appropriate services	200	Housing stabilization services will document through HMIS and client files (leveraged services) appropriate services are addressed.
	Fund leveraged (beyond ESG)	4 programs	Identify at least 4 programs that can support target households: Security Deposit Guarantee Program; BSP/HFF; RAP and mainstream resources (e.g. TFA, FS, LIA Medicaid, SAGA Cash, Dental Clinics, etc.
	Participation with Opening Doors- CT	6 meetings annual	Activity participate with Opening Doors –CT Steering Committee and added quarterly Reaching Home – Crisis Response Workgroup Meetings
DH-1.1 Decent Housing with Purpose of new or Improved Availability/Accessibility	Number of homelessness reoccurrences among DSS assisted families leaving emergency shelters	200	Based upon HMIS data, there will be fewer numbers of reoccurrences among households. Shelter data entry and BSP/HFF or a new program compliance with data entry is essential to success of this measure. Contractual language will be added to address data quality.

	Increases in efficiency or elimination of duplication identified	10% system change	With the alignment of all DSS funded Housing programs under 1 agency; housing silos that target low- to moderate-income households will reflect streamlined processes.
	Alignment of statewide Housing program systems within 12 months	40% system change	With the alignment of all DSS funded Housing programs under 1 agency; housing silos that target low- to moderate-income households will be reduced
	Number of New RAP certificates	250	Governor's proposed budget identifies 250 NEW Rap certificates.
	Participation with Opening Doors- CT	6 meetings annually	Actively participate with Opening Doors –CT Steering Committee and added quarterly Reaching Home – Crisis Response Workgroup Meetings

Proposed Activity - HMIS

Annual Action Plan Planned Project Results			
Outcomes and Objectives	Performance Indicators	Expected Number	Activity Description
DH-1.1 Decent Housing with Purpose of new or Improved Availability/Accessibility	Percentage change of HMIS data quality scores of at least 5% during 1st year and 15% within 2 year.	6 meetings annually	Actively participate in Statewide Continuum of Care-HMIS Workgroup
	Alternate means to address homelessness are achieved	6 meetings annually	Attend BOS-Continuum of Care Meeting; review Housing Inventory Charts; PIT Count; network and leverage resources of partners (state agencies, municipalities, non-profit providers and landlords, etc.)

b. Discussion of Funding Priorities

- Explain why the recipient chose to fund the proposed activities at the amounts specified (recommended: if available, use locally-relevant data to support the funding priorities, and explain how the funding priorities will support the national priorities established in Opening Doors: Federal Strategic Plan to Prevent and End Homelessness).

DSS has identified funding priorities based upon 3 key factors:

1. Homeless shelter data from HPRP data; PIT Count 2011 and annual FY 2011 Annual Homeless Shelter Demographic Report, which are embedded in this document;
2. Opening Doors – Connecticut – Framework for Preventing and Ending Homelessness, Reaching Home 2.0 Steering Committee Members and agenda from 1st Meeting, which is embedded in this document.

It should be noted that on the United States Interagency Council on Homelessness' website, featured Connecticut's state plan to end homelessness. Connecticut was the 1st state in the country to develop such a plan. "Opening Doors: Federal Strategic Plan to Prevent and End Homelessness" is clear and Connecticut has already embraced the charge whole heartedly. Opening Doors-CT is clear and with

HUD's approval of this approach; Connecticut will be able to begin the 1st steps toward re-tooling its crisis response system.

3. Number of clients served through DSS funded CT Beyond Shelter Program – FY 2011.

From DSS's experience with provision of services to literally homeless populations, one thing is clear, if households with low to moderate barriers can be assisted during their 1st episode of homelessness and provided with housing stabilization supports, they are not likely to re-enter shelter within their 1st year of housing placement. Prior to implementation of Homelessness Prevention and Rehousing Program (HPRP); financial resources available for homeless households to access were limited to those that were identified as part of the homeless subpopulations (e.g. chronically homeless, seriously mentally Ill, chronic substance abuse, etc.) According to the FY 2011 Annual Homeless Shelter Demographic Report (generated from CTHMIS); a total of 10,640 unduplicated persons received services through the CT Emergency Shelter system. Although HPRP resources are committed and no longer available, the need for financial assistance and housing stabilization services remain a need for literally homeless households. ESG allocation #2 – Rapid Re-Housing-Rental Assistance ($540,070.00) will allow Connecticut to continue its forward process started by the lessons learned from HPRP, CT Beyond Shelter Program and Housing First for Families.

Based up the available of resources, DSS had to make a tough decision about the best method to maximize the resources in order to serve the target population. The message from HUD Secretary Donavan made the decision easy – "*invest highly in rapid rehousing*", which translates into target resources to get homeless households out of emergency shelters and into permanent housing and provide support services to keep them stably housed. DSS has already started this approach through its existing housing find/housing stabilization services; however the lack of financial assistance sometimes made it difficult to sustain a household over a period of time. Through existing resources, DSS currently provides the following services through various contractors and has chosen to identify these resources as options for ESG Allocation #2:

a. Prevention – Eviction Foreclosure Prevention Program (EFPP) – state/federal resources
b. GSDP – Guarantee Security Deposit Program – state/federal resources
c. Housing Find/ Stability Case Management – state resources
d. Legal Services – state/federal resources

Although a need might exist based upon homeless data for additional emergency shelter component services; DSS has reached the HUD identified limits for Emergency Solutions Grant allocations.

Finally, $75,000.00 has been identified for the HMIS component. Based upon existing data quality; additional resources had to be targeted specific to ensuring that Connecticut's data quality improved drastically and quickly. A number of agencies require on-site or remote sessions and current funding

levels don't support such activity. Also, targeting these funds for HMIS purposes will assist Connecticut in its ability to meet HUD reporting requirements specific to HEARTH. Connecticut wants to identify a minimum data quality score for all programs that enter information into HMIS and without these resources, the requirement for a minimum data quality score will not be attainable. Also, these resources will ensure that Connecticut and the BOS-CoC will be able to comply with HUD expectations specific to annual PIT Counts, as well as required submission to HUD.

- Identify any obstacles to addressing underserved needs in the community.

  The obstacles that exist are the same each year. Based upon HMIS, the following are the top 6 reasons for homelessness:

  1. Cost of Housing/Expenses exceed income
  2. Underemployed/unemployed
  3. Substance Abuse
  4. Mental Health
  5. New to Area
  6. Family Violence

  The Partnership for Strong Communities held an I-Forum on Tuesday, March 21, 2011 entitled "*Opening Doors-Connecticut: Using the Right Tools to End Homelessness*". One of the presenters, Katherine Gayle had an interesting perspective when discussing barriers/systems that exist in the provision of needed services. Emergency Shelters can't be all things to all people and must think about partnering/leveraging services through the provision of the right services at the right time. Ms. Gayle's presentation is embedded in this document. These barriers currently hinder our ability to address the needs of the target population. Connecticut is just beginning to have these conversations within the Reaching Home Crisis Response Workgroup, of which the member list is also embedded in this document. DSS cannot effect change on its own, and it is through dialogue and conversation with providers, Balance of State CoC and members of CT Interagency on Supportive Housing and Homelessness the identified barriers are not insurmountable.

Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

c. Detailed Budget

FY 2011 Detailed Budget Table					
First Allocation	$1,171,305.00	**FY 2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations**			
Second Allocation	$658,859.00				
Grant Amount	$1,830,164.00				
Total Administration	$137,262.30				
		First Allocation		**Second Allocation**	**Total Fiscal Year 2011**
	Eligible Activities	**Activity Amount**	**Reprogrammed Amount**	**Activity Amount**	**Activity Amount**
Emergency Shelter Grants Program	Homeless Assistance	**$1,145,720.00**	**$0.00**		**$1,145,720.00**
	Rehab/Conversion	$0.00	$0.00		$0.00
	Operations	$988,665.00	$0.00		$988,665.00
	Essential Services	$157,055.00	$0.00		$157,055.00
	Homelessness Prevention	**$0.00**	**$0.00**		**$0.00**
	Administration	**$25,585.00**	**$0.00**		**$25,585.00**
	Emergency Shelter Grants Subtotal	**$1,171,305.00**	**$0.00**		**$1,171,305.00**
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		**$0.00**	**$69,375.00**	**$69,375.00**
	Rapid Re-housing		**$0.00**	**$540,070.00**	**$540,070.00**
	Housing Relocation and Stabilization Services			$0.00	$0.00
	Tenant-Based Rental Assistance			$540,070.00	$540,070.00
	Project-Based Rental Assistance			$0.00	$0.00
	Homelessness Prevention		**$0.00**	**$0.00**	**$0.00**
	Housing Relocation and Stabilization Services			$0.00	$0
	Tenant-Based Rental Assistance			$0.00	$0
	Project-Based Rental Assistance			$0.00	$0.00
	Administration			**$49,414.00**	**$49,414.00**
	Emergency Solutions Grants Subtotal		**$0.00**	**$658,859.00**	**$658,859.00**
			Total Grant Amount:		**$1,830,164.00**

****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).**

6. Written Standards for Provision of ESG Assistance

The State of Connecticut has begun having preliminary discussions on implementing a statewide Rapid Re-Housing Financial Assistance Fund with new Emergency Solution Grant funds. This fund, which is a hybrid of CT's Homelessness Prevention and Rapid Re-housing Program (HPRP), Beyond Shelter CT Program (BSCT) and Housing First for Families (HFF). Connecticut has identified best practices and lessons learned from the various programs. It should be noted the identified ESG funds are a fraction of Connecticut's HPRP allocation, which is why Connecticut is focusing rapid rehousing financial assistance and leveraging existing state resources for stabilization services. At present, the hybrid program is entitled, "CT Housing First" which will have 2 components RR-financial assistance (ESG funds) and housing find/stabilization services (leveraged resources).

The following program standards have been developed to implement the Statewide Emergency Solution Grant financial assistance Fund; while leveraging existing state resources identified for housing find and housing stabilization programs to assist households with case management and stabilizations services up to a maximum of 12 months from leaving homelessness. During the next few months, Connecticut will continue to review and revise these policies, as additional resources and efforts to identify mainstream resources are realized.

a. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant

Since Connecticut will utilize the existing system that targets literally homeless households for housing stabilization services, this system will not have to be reinvented. The BSCT network of providers currently provide housing stabilization services utilizing standard and shared policies and tools for evaluating program eligibility.

Literally homeless individuals and families may access the program through two entry point:

1. Emergency Shelter staff can refer homeless household to BSCT for service, which can include financial assistance & housing stabilization or housing stabilization services only;
2. Referral from community partners (Head Start, CoC, etc) to BSCT for services.

No matter the entry point, a household (individual or family) contacts the program and if the program has openings, they will receive an initial screening to determine potential eligibility. If deemed potentially eligible for services, a more complete assessment to confirm eligibility is performed for services only or services and financial assistance. Eligibility for financial assistance requires the household to be literally homeless, which means: "*Literally homeless individuals and families currently living in an emergency shelter or place not meant for human habitation*."

BSCT, the feeder program will complete the ESG Financial Assistance Application and submit the documentation to the ESG Financial Assistance Administrator to be selected through a competitive procurement process. The BSCT will then forward the completed application for financial assistance with verifying documentation of identification, literal homelessness and income (if applicable) to the ESG financial assistance fund administrator who will provide the financial assistance. The ESG Financial Assistance Administrator will:

- Review the submitted documents to ensure compliance with HUD expectations and approval as appropriate based upon the availability of funds
- Approval the financial assistance and update all applicable systems.
- All financial assistance checks will be cut to a third party and kept in the client's file with the BSCT case manager.
- Administrator will issue checks to identified parties within 3 – 5 days, assuming all required paperwork and supporting documentation is in place for compliance with HUD requirements.

The initial screening and application process also collects certain basic demographic information on the household (HMIS universal data elements). Households determined initially eligible will receive a full assessment of housing barriers and household resources. Households may be screened out at this point if 1) the household appears to have other resources/housing opportunities that it can access to become re-housed without ESG financial assistance, or 2) the household has very high or multiple barriers to re-housing and another more appropriate placement or referral can be made. Households that are deemed ineligible will continue to receive engagement services through emergency shelter case management services provided by shelter staff.

b. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homelessness assistance providers, and mainstream service and housing providers.

The State of Connecticut currently has systems in place that maximize coordinator of the identified providers. Through BSCT and ESG Financial Assistance Fund coordinator shall occur on various levels:

- BSCT Coordinators meet bi-monthly to discuss, update and amend statewide housing stabilization practices, housing stabilization practices, suggest revisions to existing tools and program policies & procedures, as well as brainstorm on the most efficient ways to stabilize rapidly re-housed households. The meetings are convened by CT Coalition to End Homelessness and DSS attends, when requested.

- BSCT Coordinators coordinate with emergency shelters in their catchment area, which they have referral relationships.
- Attend Continuum of Care sub continua meetings
- Connecticut is also considering 2 additional approaches:
    i. The 1st Reaching Home Crisis Response Workgroup is scheduled to convene their 1st meeting on April 12, 2012. CCEH's Executive Director is the head of the workgroup and the DSS will approach the workgroup members to determine if it would be appropriate for an additional member to be included specific to ESG.
    ii. Continue to work with HUD local representative to convene meetings every 6 months with ESG grantees (Connecticut and municipalities).

c. Policies and procedures for determining and prioritizing which eligible families and individuals will receive rapid re-housing financial assistance and housing stabilization services.

Eligible households that are literally homeless at the time of contacting the program, are living in shelter or in a place not meant for human habitation and have been accepted into BSCT program will receive rapid re-housing financial assistance services. A condition for receiving ESG financial assistance will be engagement with BSCT which provides housing stabilization services through state resources. Priority will be given to homeless households located in non-ESG municipalities and ESG-municipalities that are not utilizing their ESG second allocation for rapid re-housing services. Connecticut is currently exploring the possibility of identifying a regional proportionate share based upon # of homeless households served through BSCT, Average Median Income, Fair Market Calculations, etc. to ensure that the limited resources are allocated fairly.

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

Financial assistance is based on providing "the least amount of assistance for the least amount of time" while proving enough initial support to be reasonably sure that the housing will stick. Any household moving to new housing may receive 1) deposit only 2) one month's rent and deposit, or 3) a full or partial deposit (if needed) plus a short-term rental subsidy not to exceed 50% of the rent or 50% of the household's income up to 12 months. Exceptions to this minimum rent will be made for households with no or extremely low incomes that have a credible plan to gain employment and/or benefits that are expected to start within six months and can sustain the household after the subsidy period

Utility assistance will only be offered to households with utility arrears that prevent them from establishing utilities in a new location. Any other utility need will be referred to other programs,

such as the LIHEAP, Assurance 16 case management, Operation Fuel, and matching payment programs offered by utility companies.

e. 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 adjust over time.

The ESG Financial Assistance Fund is intended to offer as little support as needed to re-house households quickly into permanent housing and reserve resources as much as possible for other households. Financial Assistance will not be offered for more than 12 months per household, with income recertification every three months per household.

As described, an engaged household will receive either:
1) Deposit only – one-time financial assistance and up to 12 months of housing stabilization services;
2) Full or partial deposit and one month rent, intended for household's with a source of income (employment, disability or retirement benefits) sufficient to cover rent after re-housing but with need for initial support to securely transition to housing - one time financial assistance and up to 12 months of housing stabilization services;
3) Full or partial deposit and a short-term subsidy to temporarily bridge the income gap, no more than 12 months of financial assistance with income recertification every three months to adjust the rental assistance up or down by 25% per 3 months recertification and up to 12 months of housing stabilization services; and
4) Housing find services only, provided through leveraged services.
It should be noted that Connecticut is exploring instituting regional caps on maximum financial assistance based upon the Average Median Income and Fair Market Rents. Maximum Financial Assistance will be for 12 months, with income recertification every 3 months. It is Connecticut's hope that instituting a maximum cap of financial assistance; the thought of reserving resources as much as possible for other households will be obtained.

f. Standards for determining the type, amount, 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 participants may receive assistance.

Connecticut is following practices that it learned from HPRP, provide as little financial assistance services, as necessary to keep the household stably housed, will reserve resource as much as possible for other households. Targeting will be the key to maximizing these resources. The ESG financial assistance is intended to provide rental assistance and rapid re-housing services to

literally homeless individuals/families. Financial assistance will be provided up to twelve months, with 3 month recertification to determine if the need still exists; or when the household meets/exceeds the eligibility requirements/financial cap, whichever comes sooner. Connecticut will utilize lessons learned from HPRP to determine financial cap for regions.

Case management, provided through leveraged services, will be provided for households that receive financial assistance. Case Managers are expected to work with households to obtain benefits/entitlements, including income and health coverage or make a referral to another agency that can assist with identified need.

Households in need of housing search assistance will receive help, identifying units and making applications to landlords. Households will receive housing and support services that focus on ensuring that the household has the support needed to make progress on the housing stabilization plan and that the landlord is satisfied that the household is receiving support for housing related needs.

7. Describe Process for Making Sub-awards

The State of Connecticut intends to utilize 2 processes for the making of sub-awards: competitive procurement and sole-source activities.

a. The State of Connecticut will competitively procure a portion of ESG Allocation #2 funds for Rapid Rehousing – Rental Assistance identified funding to one entity for the administration of the financial assistance. The successful candidate will demonstrate their ability to administer financial assistance as well as provide other services associated with rental assistance: HMIS utilization, inspections, rent reasonableness verification, fair market rent verification, 3 month verifications, etc. DSS will incorporate best practices learned from its administration of the statewide HPRP regional programs. Connecticut will leverage existing resources to provide rapid rehousing – housing relocation and stabilization services; as these programs target homeless households without financial resources to keep the households stably housed. It is DSS's expectation to have the competitive procurement issued no later than May 31, 2012.

b. The State of Connecticut intends to sole-source a portion of ESG Allocation #2 funds to Connecticut Coalition to End Homelessness, Inc. ("CCEH") for HMIS component. CCEH is Connecticut's lead HMIS agency and thus already has systems in place to maximum these funds. ESG Allocation #2 funds targeted for HMIS will assist the Balance of State Continuum of Care with caring out their activities associated with

HEARTH expectations, PIT Count, CT Opening Door Campaign; which are not presently covered by existing resources.

Currently, Connecticut utilizes state resources totaling $170,000.00 for the support of CT's HMIS (Service Point 4.0) annually. CT has also committed in SFY 2013 to assist with the purchase of a new HMIS system with one-time funding, as the current system is not responsive to the needs of Connecticut homeless service providers, state agencies and CT Continua of Care. No HUD monies will be utilized to purchase the new HMIS system; however, it should be noted that the Statewide Continuum of Care-HMIS/PIT subcommittee conducted a procurement process to identify the new system. Once again, Connecticut is demonstrating its participation and responsiveness with the Continuum of Care process.

8. Homeless Participation Requirement

Per the guidance issued by HUD in Notice of the FY 2011 Substantial Amendment Process and Other Related Information for Recipients of Emergency Solution Grants Program Funds and Rules and Regulations §576.405, (a) states, "*Unless the recipient is a State, the recipient must provide for the participation of not less than one homeless individual or formerly homeless individual on the board of directors or other equivalent policy-making entity of the recipient, to the extent that the entity considers and makes policies and decisions regarding any facilities, services, or other assistance that receive funding under Emergency Solutions Grant (ESG).*" As a state recipient, this section is not applicable for State of Connecticut.

Although Connecticut is not required to participate in the "Homeless Participation Requirement", Connecticut believes that empowerment of consumers is important. According to Emergency Shelter State Regulation Section 17-590-6 (a), "*Each shelter shall create a shelter grievance procedure. The shelter shall consult with residents of the shelter when creation the grievance procedures*." And Section 17-590-7 (a)(1) states, "*Any decision of a grievance review may be appealed to: (1) a panel of three people, consisting of a shelter resident or former resident, a shelter staff person or a member of the Board of Directors and another person not employed by the shelter or receiving shelter services. The panel chairperson shall be the person not employed by the shelter or receiving shelter services; …*"

9. Performance Standards

The recipient must describe the performance standards for evaluating ESG activities, which must be developed in consultation with the Continuum(s) of Care.

The State of Connecticut is an active member of the Balance of State Continuum of Care Steering Committee. The State of Connecticut intends to consult with the BOS CoC Steering Committee and

applicable subcommittees to begin to develop performance standards for evaluating ESG activities, the HEARTH outcomes will be an integral part of the process. The Continuum of Care has 2 subcommittees that might be integral to the development of performance standards and they are as follows: Mainstream Resources/Discharge Planning Subcommittee and Scoring/Evaluation Subcommittee. It is Connecticut's expectation that providers will meet or exceed the identified performance standards, which are currently under development.

Connecticut will also utilize the Reaching Home's crisis response system workgroup to assist with these efforts, as members represent service providers, state agencies, philanthropy, etc. in an effort to identify measures for success and applicable reporting outcomes in an effort to address the 5 key goals:

a. Target appropriately to ensure that monies are maximized, for example those that most need the assistance. CT is just starting to examine the implications of coordinated/centralized intake process and the applicable impact up the current system. Connecticut has data that identifies the population utilizing our shelter system, however, now we must look at methods to coordinate service to better target the resources. The first hurdle that Connecticut will have to address will be targeting criteria for homeless households that should be rapidly re-housed. Between the assistance of the CoC and the workgroup, Connecticut will be provided with enough information to create the best possible system from the existing information available.

b. Reducing the number of persons entering shelter: Approximately 9.18% of those anticipated to be served with ESG funded services will be homeless upon entry. Through the review of HMIS data, CT and its subrecipients will be able to track where persons enter the program from and compare this information with Point In Time Data collected annually. Connecticut plans on contractually requiring emergency shelters and transitional programs to participation in annual PIT Counts. Based upon current demand, the immediate reduction in shelter beds will not be felt; however, it is anticipated that the number of available beds will be occupied by those previously considered unsheltered because of overcapacity.

c. Shortening the time persons spend homeless: A primary goal for Connecticut is the reduction in the length of stay in homelessness. Through rapid re-housing services, it is expected to occur within 60 days of homelessness. Connecticut will also have to spend time educating the provider network concerning the feasibility of "shortening the length of stay" practices in homeless shelters. Shortening the stay in homelessness will hopefully become the new mindset and not viewed as impossible. In order to be successful, CT will have to start to

develop goals and benchmarks toward achieving that goal and contractually require subrecipients to make efforts to reach such goals and benchmarks.

d. Providing the right service at the right time: CT currently contractually requires emergency shelter providers to report on the follow outcome: *"Client attains alternative housing and/or accesses social and/or treatment services. Alternative housing includes, but is not limited to, transitional housing, residential treatment programs, supportive and permanent housing. Social services include but are not limited to domestic violence abuse counseling, family counseling, educational and employment and financial counseling, child care, security deposit and rental assistance programs. Treatment services include, but are not limited to, residential and outpatient mental health and substance abuse treatment and medical treatment.*" However, we have learned from Homelessness Prevention and Rapid Re-Housing (HPRP) that the greatest barrier to housing for most clients is lack of income. Based upon this fact, CT will have to require additional performance standards to address the income barrier and at a minimum, look at income as 2 measures: (1) percentage of households leaving with employment income and (2) percentage of households entering with income and leave the program with an income. Finally, we examine data specific to households that leave homelessness, per HMIS, return to homelessness within 12 months.

e. HMIS data quality score – Connecticut is exploring the possibility of contractually requiring a data quality score as a performance measure. Compliance rate at a minimum will range between 90% - 95% during the 1st year of performance measures. Connecticut has learned from submission of reports specific to HPRP, PIT and APRs that incomplete or inaccurate data hinders the state's ability to document homelessness in Connecticut.

As Connecticut is in the planning stages of performance measures to ensure HEARTH compliance, they will be implemented and enforced through contractual requirements

10. Certifications – included in Attachments Section of this document.

C. Written standards required for recipients who are eligible and decide to use part of the second allocation of FY 2011 funds for emergency shelter and street outreach activities.

The State of Connecticut does not intend to use any part of the second allocation of FY 2011 for emergency shelter and street outreach activities, so this section is not applicable. The budget detail will reflect this fact.

D. Requirements for recipients who plan to use the risk factor under paragraph (1)(iii)(G) of the "at risk of homelessness" definition

• If 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 specific characteristics associated with instability and increased risk of homelessness.

The State of Connecticut does not intend to serve persons who are "at risk of homelessness" with any part of the second allocation of FY 2011, so this section is not applicable. The budget detail will reflect this fact.

E. Requirements for Optional Changes to the FY 2011 Annual Action Plan

1. Centralized or Coordinated Assessment System

• If the recipient's jurisdiction, or a portion of the recipient's jurisdiction, currently has a centralized or coordinated assessment system and the recipient or subrecipients utilize the centralized or coordinated assessment system, the recipient should describe the assessment system in the substantial amendment.

The State of Connecticut does not currently have a centralized or coordinated assessment system. Through CT Opening Doors and the efforts of the State of Connecticut, a centralized or coordinated assessment system is an intended output, but such output will not be realized by the time this substantial amendment must be submitted. This section is not applicable to Connecticut.

2. Monitoring

• If existing monitoring procedures are not sufficient to allow recipients to monitor compliance with the new requirements, HUD encourages recipients to update their monitoring standards and procedures in the process of submitting this substantial amendment. This should address appropriate levels of staffing.

The State of Connecticut's monitoring procedures are current at this time and no further modification will be required. Connecticut's current monitoring procedures are fluid enough to embrace ESG requirements identified under the second allocation of FY2011.

Attachments:

A. HUD SF-424 Form

B. Program Certification(s)

C. Legal Notices: Published on 3/22/2012 & Published on 4/12/2012

D. Transcripts: 4/10/2012 Public Hearing & 5/1/2012 Public Hearing

E. Public Comments

SF 424

The SF 424 is part of the CPMP Annual Action Plan. SF 424 form fields are included in this document. Grantee information is linked from the 1CPMP.xls document of the CPMP tool.

SF 424

Complete the fillable fields (blue cells) in the table below. The other items are pre-filled with values from the Grantee Information Worksheet.

Date Submitted	Applicant Identifier	Type of Submission	
Date Received by state	State Identifier	**Application**	**Pre-application**
Date Received by HUD	Federal Identifier	☐ Construction	☐ Construction
		☐ Non Construction	☐ Non Construction

Applicant Information		
State of Connecticut		UOG Code
Department of Social Services		Organizational DUNS: 807854435
25 Sigourney Street		Organizational Unit: Department of Social Services
Hartford	Connecticut	Department: Division of Community, Energy & Refugee Services
06106	Country U.S.A.	Division: Bureau of Aging, Community & Social Work Services
Employer Identification Number (EIN):		County
06-1274678		Program Year Start Date (MM/DD) July 1, 2011
Applicant Type:		**Specify Other Type if necessary:**
State Government Agency		Specify Other Type
Program Funding		**U.S. Department of Housing and Urban Development**

Catalogue of Federal Domestic Assistance Numbers; Descriptive Title of Applicant Project(s); Areas Affected by Project(s) (cities, Counties, localities etc.); Estimated Funding

Community Development Block Grant		14.218 Entitlement Grant
CDBG Project Titles		Description of Areas Affected by CDBG Project(s)
$CDBG Grant Amount	$Additional HUD Grant(s) Leveraged	Describe
$Additional Federal Funds Leveraged		$Additional State Funds Leveraged
$Locally Leveraged Funds		$Grantee Funds Leveraged
$Anticipated Program Income		Other (Describe)
Total Funds Leveraged for CDBG-based Project(s)		

Home Investment Partnerships Program		14.239 HOME
HOME Project Titles		Description of Areas Affected by HOME Project(s)
$HOME Grant Amount	$Additional HUD Grant(s) Leveraged	Describe
$Additional Federal Funds Leveraged		$Additional State Funds Leveraged
$Locally Leveraged Funds		$Grantee Funds Leveraged

$Anticipated Program Income	Other (Describe)
Total Funds Leveraged for HOME-based Project(s)	

Housing Opportunities for People with AIDS	14.241 HOPWA	
Housing Opportunities for People with AIDS	Balance of State Eligible Metropolitan Services Area	
$HOPWA Grant Amount - $283,878.00	$Additional HUD Grant(s) Leveraged	Describe
$Additional Federal Funds Leveraged	$Additional State Funds Leveraged	
$Locally Leveraged Funds	$Grantee Funds Leveraged	
$Anticipated Program Income	Other (Describe)	
Total Funds Leveraged for HOPWA-based Project(s) $283,878.00		

Emergency Shelter Grants Program	14.231 ESG	
Emergency Shelter Grants / Emergency Solution Grants Program (ESG)	State wide - Connecticut	
$ESG Grant Amount - $1,830,164.00	$Additional HUD Grant(s) Leveraged	Describe
$Additional Federal Funds Leveraged	$Additional State Funds Leveraged	
$Locally Leveraged Funds	$Grantee Funds Leveraged	
$Anticipated Program Income	Other (Describe)	
Total Funds Leveraged for ESG-based Project(s) - $1,830,164.00		

Congressional Districts of: 1st, 2nd, 3rd, 4th, 5th Applicant Districts	1st, 2nd, 3rd, 4th, 5th Project Districts	Is application subject to review by state Executive Order 12372 Process?	
Is the applicant delinquent on any federal debt? If "Yes" please include an additional document explaining the situation.		☐ Yes	This application was made available to the state EO 12372 process for review on DATE
		☐ No	Program is not covered by EO 12372
☐ Yes	☐ No	☐ N/A	Program has not been selected by the state for review

Person to be contacted regarding this application		
First Name: Carlene	Middle Initial O.	Last Name Taylor
Title: Social Services Program Administration Manager	Phone – 860-424-5889	Fax 860-424-4957
eMail: carlene.taylor@ct.gov	Grantee Website http://www.ct.gov/dss/site/default.asp	Other Contact
Signature of Authorized Representative Claudette J. Beaulieu, Deputy Commissioner		Date Signed 5/5/12

CPMP State Grantee Certifications

Many elements of this document may be completed electronically, however a signature must be manually applied and the document must be submitted in paper form to the Field Office.

☐ This certification does not apply.
☒ This certification is applicable. See signature on the last page.

STATE CERTIFICATIONS

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

Affirmatively Further Fair Housing -- The State will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the state, 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 state'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 State -- The submission of the consolidated plan is authorized under State law and the State possesses the legal authority to carry out the programs under the consolidated plan 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

5/5/12
Date

Claudette J. Beaulieu
Name

Deputy Commissioner, Department of Social Services
Title

25 Sigourney Street
Address

Hartford, CT. 06106
City/State/Zip

860-424-5004
Telephone Number

☐ This certification does not apply.
☒ This certification is applicable. See signature on the last page.

HOPWA Certifications

The State HOPWA grantee certifies that:

Activities -- Activities funded under the program will meet urgent needs that are not being met by available public and private sources.

Building -- Any building or structure assisted under the program shall be operated for the purpose specified in the plan:

1. For at least 10 years in the case of any building or structure purchased, leased, rehabilitated, renovated, or converted with HOPWA assistance,
2. For at least 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

Signature/Authorized Official

Date 5/5/12

Claudette J. Beaulieu

Name

Deputy Commissioner, Department of Social Services

Title

25 Sigourney Street

Address

Hartford, CT. 06106

City/State/Zip

860-424-5004

Telephone Number

☐ **This certification does not apply.**
☒ **This certification is applicable. See signature on the last page.**

ESG Certifications

The Emergency Shelter Grantee certifies that:

1. The requirements of 24 *CFR* 576.21(a)(4) which provide that the funding of homeless prevention activities for families that have received eviction notices or notices of termination of utility services meet the following standards: (A) that the inability of the family to make the required payments must be the result of a sudden reduction in income; (B) that the assistance must be necessary to avoid eviction of the family or termination of the services to the family; (C) that there must be a reasonable prospect that the family will be able to resume payments within a reasonable period of time; and (D) that the assistance must not supplant funding for preexisting homeless prevention activities from any other source.

2. The requirements of 24 *CFR* 576.25(b)(2) concerning the submission by nonprofit organizations applying for funding of a certification of approval of the proposed project(s) from the unit of local government in which the proposed project is located.

3. The requirements of 24 *CFR* 576.53 concerning the continued use of buildings for which Emergency Shelter Grant funds are used for rehabilitation or conversion of buildings for use as emergency shelters for the homeless; or when funds are used solely for operating costs or essential services, concerning the population to be served.

4. The building standards requirement of 24 *CFR* 576.55.

5. The requirements of 24 *CFR* 576.56, concerning assistance to the homeless.

6. The requirements of 24 *CFR* 576.57, other appropriate provisions of 24 *CFR* Part 576, and other applicable Federal law concerning nondiscrimination and equal opportunity.

7. The requirements of 24 *CFR* 576.59(b) concerning the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970.

8. The requirements of 24 *CFR* 576.59 concerning minimizing the displacement of persons as a result of a project assisted with these funds.

9. (9) The requirements of 24 *CFR* 576.56(a) and 576.65(b) that grantees develop and implement procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the Emergency Shelter Grants Program and that the address or location of any family violence shelter project assisted with ESG funds will not be made public, except with written authorization of the person or persons responsible for the operation of the shelter.

10. The requirement of that recipients involve, to the maximum extent practicable, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, and in providing services for occupants of these facilities as provided by 24 *CFR* 576.56(b)(2).

11. The new requirement of the McKinney Act (42 *USC* 11362) to develop 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, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons. I further understand that State and local governments are primarily responsible for the care of these individuals, and that ESG funds are not to be used to assist such persons in place of State and local resources.

Jurisdiction

I certify that the State will comply with the requirements of 24 *CFR* Part 24 concerning the Drug Free Workplace Act of 1988.

I certify that the State will comply with the provisions of, and regulations and procedures applicable under 24 *CFR* 576.57(e) with respect to the environmental review responsibilities under the National Environmental Policy Act of 1969 and related authorities as specified in 24 *CFR* Part 58 as applicable to activities of nonprofit organizations funded directly by the State. The State also agrees to assume the Department's responsibility and authority as set forth in 24 *CFR* 576.57(e) for acting on the environmental certifications and requests for the release of funds submitted to the State by local government recipients.

I certify that the State will ensure the provision of the matching funds required by 24 CFR 576.51 and 42 *USC* 11375, including a description of the sources and amounts of such supplemental funds, as provided by the State, units of general local government or nonprofit organizations.

I further certify that the submission of a complete and approved Consolidated Plan with its relevant certifications, which is treated as the application for an Emergency Shelter Grant, is authorized under State law, and that the State possesses legal authority to fund the carrying out of grant activities by units of general local government and nonprofit organizations in accordance with applicable laws and regulations of the Department of Housing and Urban Development.

Signature/Authorized Official

Date 5/5/12

Claudette J. Beaulieu

Name

Deputy Commissioner, Department of Social Services

Title

25 Siqourney Street

Address

Hartford, CT. 06106

City/State/Zip

860-424-5004

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☐ This certification does not apply.
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APPENDIX TO CERTIFICATIONS

Instructions Concerning Lobbying and Drug-Free Workplace Requirements

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.

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

Place Name	Street	City	County	State	Zip
State of CT. Department of Social Services	25 Sigourney Street	Hartford		CT	06106

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).

Note that by signing these certifications, certain documents must completed, in use, and on file for verification. These documents include:

1. Analysis of Impediments to Fair Housing
2. Citizen Participation Plan
3. Anti-displacement and Relocation Plan

Signature/Authorized Official

5/6/12
Date

Claudette J. Beaulieu
Name

Deputy Commissioner, Department of Social Services
Title

25 Sigourney Street
Address

Hartford, CT. 06106
City/State/Zip

860-424-5004
Telephone Number

NOTICE OF PUBLIC HEARING
The State of Connecticut
Department of Economic and Community Development
is seeking public input into the development of the
Draft Substantial Amendment to the 2011-2012 Action Plan for Housing and Community Development

The 2011-2012 Action Plan for Housing and Community Development is the second annual implementation plan under the 2010-2015 Consolidated Plan for Housing and Community Development (ConPlan). The ConPlan is a five-year strategic plan that governs the administration of federal funding appropriated for housing and community development activities that benefit persons of low- and moderate-income. Such federal funding includes the following programs; HOME Investment Partnerships (HOME), Small Cities/Community Development Block Grant (SC/CDBG), Emergency Shelter/Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). The HOME and SC/CDBG programs are administered by the Department of Economic and Community Development and the ESG and HOPWA programs are administered by the Department of Social Services. The 2010-2015 ConPlan represents approximately $145 million in federal funding over the five-year period.

A substantial amendment to the 2011-2012 Action Plan is required by the Department of Housing and Urban Development (HUD), to receive the second allocation of federal fiscal year 2011 funding for the Emergency Solutions Grants program. HUD published the interim rule for the Emergency Solutions Grants program and Consolidated Plan conforming amendments (Interim Rule) in the Federal Register on December 5, 2011. The second allocation of funding for the State of Connecticut's ESG program will be approximately $ 658,859. For more information please refer to HUD's Homelessness Resource Exchange website at www.hudhre.info .

A Public Hearing to solicit input into the development of the draft Substantial Amendment to the 2011-2012 Action Plan will be held, as listed below. Additionally input on performance under the aforementioned programs is also welcomed. All input received will be used in the development of the draft Substantial Amendment to the 2011-2012 Action Plan.

Coventry
10:00 a.m.
April 10, 2012
Coventry Town Hall Annex
1712 Main Street (Route 31)
Coventry, CT

State residents are invited to attend the public hearing and provide input for the development of the draft Substantial Amendment to the 2011-2012 Action Plan. Written comments may be sent to Michael C. Santoro, Community Development Specialist, Department of Economic and Community Development, 505 Hudson Street, Hartford, CT 06106-7106 or CT.Housing.Plans@ct,gov through the close of business on April 10, 2012. For copies of the 2011-2012 Action Plan and related documents, please refer to the Department of Economic and Community Development's website, www.decd.org under Publications/Housing Plans.

Departments of Social Services and Economic & Community Development programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator, Antoinette Alphonse at 860-270-8022. Locations for public hearings are handicapped accessible.

Publication Date: March 22, 2012

NOTICE OF PUBLIC COMMENT PERIOD
The State of Connecticut
Department of Economic and Community Development
is seeking public comment on the
Draft Substantial Amendment to the 2011-2012 Action Plan for Housing and Community Development

The 2011-2012 Action Plan for Housing and Community Development is the second annual implementation plan under the 2010-2015 Consolidated Plan for Housing and Community Development (ConPlan). The ConPlan is a five-year strategic plan that governs the administration of federal funding appropriated for housing and community development activities that benefit persons of low- and moderate- income. Such federal funding includes the following programs; HOME Investment Partnerships (HOME), Small Cities/Community Development Block Grant (SC/CDBG), Emergency Shelter/Solutions Grants (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). The HOME and SC/CDBG programs are administered by the Department of Economic and Community Development and the ESG and HOPWA programs are administered by the Department of Social Services. The 2010-2015 ConPlan represents approximately $145 million in federal funding over the five-year period.

A substantial amendment to the 2011-2012 Action Plan is required by the Department of Housing and Urban Development (HUD), to receive the second allocation of federal fiscal year 2011 funding for the Emergency Solutions Grants program. HUD published the interim rule for the Emergency Solutions Grants program and Consolidated Plan conforming amendments (Interim Rule) in the Federal Register on December 5, 2011. The second allocation of funding for the State of Connecticut's ESG program will be approximately $ 658,859. For more information please refer to HUD's Homelessness Resource Exchange website at www.hudhre.info .

A thirty day public examination and comment period on the Draft Substantial Amendment to the 2011-2012 Action Plan will begin on April 13, 2012 and end on May 13, 2012. A Public Hearing will be held, as listed below, to solicit comment on the Draft Substantial Amendment to the 2011-2012 Action Plan. Additionally input on performance under the aforementioned programs is also welcomed.

Hartford
10:00 a.m.
May 1, 2012
Metropolitan District Commission (MDC)
Anthony H. Gallicchio Training Center
125 Maxim Road
Hartford, CT

State residents are invited to attend the public hearing and provide oral or written comment on the Draft Substantial Amendment to the 2011-2012 Action Plan. Written comments may be sent to Michael C. Santoro, Community Development Specialist, Department of Economic and Community Development,
505 Hudson Street, Hartford, CT 06106-7106 or CT.Housing.Plans@ct,gov through May 13, 2012. All comments received will be summarized in the final version of the Substantial Amendment to the 2011-2012 Action Plan. For copies of the 2011-2012 Action Plan and related documents, please refer to the Department of Economic and Community Development's website, www.decd.org under Publications/Housing Plans.

Departments of Social Services and Economic & Community Development programs are administered in a nondiscriminatory manner, consistent with equal employment opportunities, affirmative action, and fair housing requirements. Questions, concerns, complaints or requests for information in alternative formats must be directed to the ADA (504) Coordinator, Antoinette Alphonse at 860-270-8022. Locations for public hearings are handicapped accessible.

Publication Date: April12, 2012

STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

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IN RE: APRIL 10, 2012

DRAFT SUBSTANTIAL AMENDMENT TO THE
2011-2012 ACTION PLAN FOR HOUSING
AND COMMUNITY DEVELOPMENT

* * * * * * * * * * * * * * *

BEFORE: DEBRA LANDRY, FACILITATOR

. . .Verbatim Proceedings of a hearing before the State of Connecticut, Department of Economic and Community Development, to the Draft Substantial Amendment to the 2011-2012 Annual Action Plan for Housing and Community Development, held at 1712 Main Street, Coventry Town Hall Annex, Coventry, Connecticut, on April 10, 2012 at 10:00 a.m...

CHAIRPERSON DEBRA LANDRY: Today is April 10, 2012 and it is approximately 10:00 a.m. I am Debra Landry from the Department of Economic and Community Development and I am here today to solicit input into the development of the Draft Substantial Amendment to the fiscal year 2011 Action Plan for Housing and Community Development. A substantial amendment to the 2011-2012 Action Plan is required by the Department of Housing and Urban Development, HUD, to receive the second allocation of Federal fiscal year 2011 funding for the Emergency Solutions Grant Program. HUD lists an interim rule for the emergency solution grants program and the consolidated plan conforming amendments interim rule in the Federal Register on December 5, 2011.

The second allocation of funding for the State of Connecticut's ESG Program will be approximately $658,859. And as there are presently no people here to provide input, I'm going to close the hearing down until we have some activity. Thank you.

(Off the record.)

This is Debra Landry, it is 11:07 a.m. and there are no other members of the public that have shown up to provide comment on the Draft Substantial Amendment to the 2011 Action Plan, so I will be closing the public hearing. Thank You.

(Off the record.)

(Whereupon, the hearing was adjourned at 11:07 a.m.)

STATE OF CONNECTICUT
DEPARTMENT OF ECONOMIC AND COMMUNITY DEVELOPMENT

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IN RE: MAY 1, 2012

DRAFT SUBSTANTIAL AMENDMENT TO THE
2011-2012 ACTION PLAN FOR HOUSING
AND COMMUNITY DEVELOPMENT

* * * * * * * * * * * * * * *

BEFORE: DEBRA LANDRY, FACILITATOR

. . .Verbatim Proceedings of a hearing before the State of Connecticut, Department of Economic and Community Development, to the Draft Substantial Amendment to the 2011-2012 Annual Action Plan for Housing and Community Development, held at 125 Maxim Road, Hartford, Connecticut, on May 1, 2012 at 10:00 a.m...

CHAIRPERSON DEBRA LANDRY: Today is May 1, 2012 and it is 10:00 a.m. I am Debra Landry from the Department of Economic and Community Development and I am here today to take comments on the Draft Substantial Amendment to the fiscal year 2011 Annual Action Plan for the second allocation of emergency solution grant program funds. Presently the Draft Substantial Amendment is in the 30-day public examination comment period which began on April 13, 2012 and ends May 13, 2012.

Today I have brought with me other documents including the 2011-2012 Action Plan, the one that is being amended and our last annual report submitted to HUD the 2010 consolidated annual performance and evaluation report, as well as a copy of the Draft Substantial Amendment that we are soliciting comments on

today.

As there is no member of the public currently present to provide comments at this time, we will recess until someone is present to write comments on the substantial amendment. Thank you.

(off the record)

MS. LANDRY: This is Debra Landry. It is now 11:05 a.m. and there are no members of the public that have shown up to provide comment on the Draft Substantial Amendment to the fiscal year 2011 Annual Action Plan for the second allocation of emergency solution grant program funds.

So I will now officially close this public hearing. Thank you.

(Off the record.)

(Whereupon, the hearing was adjourned at 11:10 a.m.)

From: Rick Earle [mailto:xcaliber1117@yahoo.com]
Sent: Saturday, May 05, 2012 8:49 AM
To: Santoro, Michael C
Subject: State ESG public comment

Attention Michael Santoro:

I am submitting my questions since we are in the public comment period for the Draft Substantial Amendment to the 2011-2012 Action Plan for Housing and Community Development.

It is stated in the Section labeled; Required Contents of Substantial Amendments, Declaration of FY that ESG municipalities will not be able to access the State ESG funds UNLESS their ESG municipality is not targeting rapid rehousing financial assistance.

1. If an ESG municipality opts out of offering Rapid Rehousing financial assistance to their constituents, how will this affect the amount of available financial assistance funds to the towns and shelters that do not receive ESG municipality funding.

2. If an ESG municipality opts out of offering Rapid Rehousing financial assistance to their constituents, will there be any priority given to emergency shelters and homeless populations outside of those municipalities to ensure all of the State ESG funds do not have to cover a municipality that receives their own ESG funds but decides not to rapidly rehouse?

3. Per this draft, State ESG funds will only cover an ESG municipality with Rapid Rehousing financial assistance in the event that the ESG municipality chooses not to offer rapid rehousing financial assistance. Does this mean that the State ESG would only provide the financial assistance and the municipality would be completing the housing stabilization for their constituents?

I live in a surrounding town of a municipality and I see so many social service resources and funding streams go in to these big cities. There are so many towns and large counties in the state with no ESG municipality and all that is available is State funds. I feel that the ESG municipalities should cover all needed programs for their constituents with their own pot of funding and once that is expended, they can request assistance from the State of Connecticut. Municipalities should not be able to decide to take funds from underserved and underfunded areas of the state in order to maximize their own city funding.

Thank you,

Concerned citizen outside of a municipality

CONNECTICUT COALITION to
END HOMELESSNESS 77 Buckingham Street, Hartford CT 06106 |P (860) 721-7876| F (860) 257-1148 | www.cceh.org

May 10, 2012

Debra Landry
Office of Strategy and Policy,
Department of Economic and Community Development
505 Hudson Street
Hartford, CT 06106

Re: Comments of the Connecticut Coalition to End Homelessness on the DRAFT Substantial Amendment to the FY 2011 Action Plan for the Second Allocation of Emergency Solutions Grants Program Funds

Dear Ms. Landry:

I am pleased to submit our written comments on behalf of the Connecticut Coalition to End Homelessness regarding the DRAFT Substantial Amendment to the FY 2011 Annual Action Plan for the Second Allocation of Emergency Solution Grants Program Funds.

Overall we applaud the Department of Economic and Community Development (DECD) and the Department of Social Services (DSS) for constructing an ESG Action Plan Amendment that aligns state resources, federal dollars and best practices to forward a more housing centered crisis response system in Connecticut. We are pleased that the State has taken the advice of Secretary Donovan and officials at HUD by focusing new ESG resources on Rapid Rehousing efforts to relieve the strain on our already overcrowded shelter system. We agree with the notion that Rapid Rehousing is a tested and effective alternative to sheltering and transitional housing. It is also worth noting that the activities detailed in the Substantial Amendment align well with the newly launched Opening Doors CT statewide framework.

We offer specific comments relating to program eligibility, targeting and outcomes as follows:

Amendment Reference:

"From the department's experience with provision of services to literally homeless populations, one thing is clear, if households with low to moderate barriers can be assisted during their 1st episode of homelessness and provided with housing stabilization supports, they are not likely to re-enter shelter within their 1st year of housing placement."

CCEH Comment:

There is little evidence that Rapid Rehousing services are not effective for populations who are commonly considered as "high barriered". While it is true that more intensive service and housing models such as permanent supportive housing should be closely targeted to those with multiple barriers to independence, there are plentiful examples of rapid rehousing assistance being very effectively used in combination with mainstream services to rehouse chronically homeless individuals or families.

Moreover, we believe that assessment of barriers at application to the program should be limited to identifying those problems that may interfere in a landlord entering a lease with the client. Even then, barriers should be addressed through the services components of the program as an alternative to screening out homeless households from the program altogether.

Amendment Reference:

"At present, the hybrid program is entitled, "CT Housing First" which will have 2 components RR-financial assistance (ESG funds) and housing find/stabilization services (leveraged resources)."

CCEH Comment:

CCEH passionately supports the housing first model and appreciates DSS and DECD's recognition that this philosophy, in broad terms, is the most effective approach for preventing and reducing homelessness. However, since the inception of the Housing First for Families Program we have received numerous comments that the term is confusing. *Housing First* is the name most commonly used to describe a model of Permanent Supportive Housing Programs targeted to long term and chronically homeless households which provides permanent subsidies and supports. To avoid confusion we suggest a different name such as the Connecticut Rapid Rehousing Program or CT-RRP.

Amendment Reference/and Comment?:

While both the current Housing First for Families and Beyond Shelter CT programs are referenced at the beginning of the document as state funded programs through which households will access rapid rehousing services and financial assistance, only the Beyond Shelter CT (BSCT) program is named beginning in Section 6.a.2. Clarification is recommended as to the role of the existing Housing First for Families Program as it is our understanding that both programs will be access points for Rapid Rehousing services.

Amendment Reference:

"Households determined— initially eligible will receive a full assessment of housing barriers and household resources. .—Households may be screened out at this point if 1) the household appears to have other resources/housing opportunities that it can access to become re-housed without ESG financial assistance, or 2) the household has very high or multiple barriers to re-housing and another more appropriate placement or referral can be made. Households that are deemed ineligible will continue to receive engagement services through emergency shelter case management services provided by shelter staff."

CCEH Comment:

We suggest that barriers assessed should only include those which would prevent a landlord from executing a lease with the head of household as all other assessment information is subjective as to its potential impact on housing stability. We suggest that any language relating to ineligibility based upon high or multiple barriers be struck as there are

no assurances that deemed ineligibility based upon such barriers complies with fair housing law or is evenly assessed.

Amendment Reference:

"*3) a full or partial deposit (if needed) plus a short-term rental subsidy not to exceed 50% of the rent or 50% of the household's income up to 12 months. Exceptions to this minimum rent will be made for households with no or extremely low incomes that have a credible plan to gain employment and/or benefits that are expected to start within six months and can sustain the household after the subsidy period".*

CCEH Comment:

CCEH suggests that references to "sustain the household" be struck as it is entirely subjective.

Amendment Reference

"Reducing the number of persons entering shelter: Approximately 9.18% of those anticipated to be served with ESG funded services will be homeless upon entry. Through the review of HMIS data, CT and its sub recipients will be able to track where persons enter the program from and compare this information with Point In Time Data collected annually."

CCEH Comment:

We believe the estimate of 9.18 percent is erroneous and should be corrected. It appears that DECD/DSS plan to use funds for Rapid Rehousing only and therefore 100% of those served will be homeless. Additionally, reference to Point in Time and HMIS analysis should be clarified. Program entry will indeed be tracked through HMIS. Reduction in homelessness will be tracked with through HMIS (year-round data) and the annual Point-in-Time Count.

Amendment Reference:

"Shortening the time persons spend homeless: A primary goal for Connecticut is the reduction in the length of stay in homelessness. Through rapid re-housing services, it is expected to occur within 60 days of homelessness. Connecticut will also time educating the provider network concerning the feasibility of "shortening the length of stay" practices in homeless shelters. Shortening the stay in homelessness will hopefully become the new mindset and not viewed as impossible. In order to be successful, CT will have to start to develop goals and benchmarks toward achieving that goal *and contractually require sub recipients to make efforts to reach such goals and benchmarks*."

CCEH Comment:

It is our assumption that DECD/DSS intent is that rapid rehousing services and other interventions reduce the length of time that households are homeless. We respectfully point out that the reference to shortening the length of stay practices in homeless shelters can be misconstrued to suggest that individual shelter and transitional housing programs length of stay policies or limits should or can be adjusted to reduce length of homelessness***. It should be noted that length of homelessness will be assessed by CoC and not by program.*** It

is our belief that individual program length of stay policies or practices are irrelevant to reducing actual length of homelessness. We suggest that references to reducing length of stay be substituted with "implement housing based services which result in quicker exit from shelter or transitional housing to housing".

Amendment Reference:

"However, we have learned from Homelessness Prevention and Rapid Re-Housing (HPRP) that the greatest barrier to housing for most clients is lack of income. Based upon this fact, CT will have to require additional performance standards to address the income barrier and at a minimum, look at income as 2 measures: (1) percentage of households leaving with employment income and (2) percentage of households entering with income and leave the program with an income. Finally, we examine data specific to households that leave homelessness, per HMIS, return to homelessness within 12 months."

CCEH Comment:

While increased income is vital to ongoing housing stability we recommend that measures relating to income are not appropriate or measurable through this program as it is a housing focused intervention. Income supports and outcomes rely in factors well outside the scope and expertise of this program. We agree that service providers should be well connected to local training and employment services and that linkages to such should be a contractual expectation of service providers.

In addition, through our experience with HPRP we have learned that HMIS is a poor vehicle for tracking income changes as with most poor households income and wage variances are frequent. We suggest that income information be gained through a data match between the HMIS and CT Department of Labor data.

Again, overall we believe that the focus and scope of the services as detailed in the draft Amendment are in keeping with the spirit and intent of HEARTH and of the CT Opening Doors Framework and look forward to working with DSS and DECD on its successful implementation.

Sincerely,

Carol Water
Executive Director