HOMELESS

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Specific Homeless Prevention Elements

1. *Sources of Funds: Identify the private and public resources that the jurisdiction expects to receive during the next year to address homeless needs and to prevent homelessness. These include the McKinney-Vento Homeless Assistance Act programs, other special federal, state, and local and private funds targeted to homeless individuals and families with children, especially the chronically homeless, the HUD formula programs, and any publicly-owned land or property. Please describe, briefly, the jurisdiction's plan for the investment and use of funds directed toward homelessness.*

2. *Homelessness: In a narrative, describe how the action plan will address the specific objectives of the Strategic Plan and, ultimately, the priority needs identified. Please also identify potential obstacles to completing these action steps.*

3. *Chronic Homelessness: The jurisdiction must describe the specific planned action steps it will take over the next year aimed at eliminating chronic homelessness. Again, please identify barriers to achieving this.*

4. *Homelessness Prevention: The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.*

5. *Discharge Coordination Policy: Explain planned activities to implement a cohesive, community- wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.*

Program Year 5 Action Plan "Specific Homeless Prevention Elements" Response:

Source of Funds

CDBG and ESG funds will be used to provide operating assistance for homeless emergency shelters, assistance to prevent homelessness, assistance to outreach and engage homeless persons, and supportive services for homeless persons through rapid re-housing.

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) revises the Emergency Shelter Grant Program administered by HUD under the McKinney-Vento Homeless Assistance Act. The change in the program's name from "Emergency Shelter Grant" to "Emergency Solutions Grant" reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

Homelessness & Other Special Needs Activities

The City of St. Louis has prioritized reducing homelessness and ending chronic homelessness in its Strategic plan and is working diligently to ultimately achieve this vision much sooner than 2015. The Strategic Plan focuses on (a) outreach and assessment, (b) address emergency shelter and transitional housing needs of homeless person and non-disabled individuals with special needs, (c) assisting individuals and families make the transition to permanent/permanent supportive housing and independent living through rapid re-housing, (d) provide prevention services to individuals and families with low-income, especially those with extremely low incomes, (e) regional collaborating with other jurisdictions towards ending long-term homelessness and (f) partnerships and collaboration new private and not-for-profit agencies.

One-year Goals and Action Steps

- **Outreach:** The City of St. Louis' plan for conducting targeted outreach to homeless persons (especially unsheltered persons) and assessing their individual needs are and will be provided through the City's Homeless Services Division and two sub-grantees: Places for People & ArchCity Defenders. Over the last 3-4 years the City's Homeless Services Division has conducted outreach to mostly unsheltered persons; providing them with flyers and information on current and upcoming housing and supportive services projects. Also, assisting them and encouraging them to receive shelter or housing by organizing services for them. Homeless Services has also taken aggressive steps to provide basic forms of case management and representation. In 2014, the City Homeless Services Division is planning to conduct an outreach engagement by conducting a launch for a new project for rapidly re-housing veterans; similar to The BEACH Project. The same agencies (Places for People, ArchCity Defenders, and the City's Homeless Services Division) will be conducting outreach for the vet project as they did with the BEACH.

- **Emergency Shelter & Transitional Housing Needs:** With the implementation of the HEARTH Act, emergency shelters and site-based transitional housing programs will play a limited role. They will be used only for those who cannot immediately be placed in permanent housing. The primary purpose of emergency shelters and site-based transitional housing programs will be to equip persons to move into appropriate forms of permanent housing as soon as possible. Emergency shelters and site-based transitional housing programs will be evaluated in part based on the percentage of persons placed into permanent housing and the length of their stays in permanent housing. While in shelter or transitional housing, participants must be surrounded by competent service delivery utilizing evidence-based or best practices.

  The City of St. Louis' latest initiative, The BEACH Project: The Beginning of the End: Abolishing Chronic Homelessness, started in March 2013, is a part of the Mayor's 10-Year Plan. The BEACH Project will bring together federal, state and local government agencies, housing providers, faith-based organizations, non-profit agencies and businesses to provide mental health and other services, along with a stable place to live for chronically homeless men and women in our community.

The BEACH Project, generated after the relocation of Homeless residents living along the riverfront encampment residents, adds several key elements to the basic TIP approach:

- A 12-month rental assistance program, with 100% rent paid for first three months and subsidies declining by 10% each successive month.
- Access to supportive services and main stream benefits.
- Case managers will assess tenants' ability to pay each month during the year.
- Up to 12 months of case management services, with follow-up contacts for an additional 6 months
- Accommodation of all household/family compositions
- Eligibility regardless of disability status
- Use of multi-bedroom units (apartments and homes) to house several single individuals
- Pre-identification and pre-selection of landlords
- Acceptance of pets
- Utilities included in rent when possible or paid temporarily by third parties

This approach directly addresses five issues that often lead to housing failure. Many single individuals, especially those with addictions, are challenged by loneliness and a loss of community when they move into scattered site units. The house-sharing system will address that. Second, some persons refuse housing because the landlord does not allow pets. They prefer to live on the streets with their animal companions. The BEACH Project can accommodate pets. Third, some housing providers do not allow nontraditional families such as same-sex or unmarried couples. The BEACH Project will welcome all household configurations. Fourth, the BEACH Project will reach non-disabled populations who cannot be served under existing regulations governing permanent supportive housing. Finally, the program will accommodate persons with past-due utility bills.

Additionally, starting in December 2013, the BEACH Project will focus on individuals that are not necessarily identified as chronically homeless, but homeless and staying in emergency shelters and transitional housing programs. The individuals/families need to have sufficient income to sustain themselves with receiving minimum assistance. This plan, in addition to the actions above, will identify those in emergency shelter and transitional housing that are receiving a sufficient amount of income in which if provide short term financial assistance could be rapidly re-housed. This will include assisting

them with security deposit, first and last month rent, and utility arrears. These efforts will be made through the end of June 2014, in which the City will launch a new project similar to the BEACH, but focuses on homeless vets, after the Summer PIT Count in July.

- **Transition to Permanent Housing & Independent Living:** In 2014, the City will seek additional permanent supportive housing for families. The City of St. Louis currently has nine permanent supportive housing programs for families. Since the launch of The BEACH Project, the City of St. Louis has established an excellent partnership with the St. Louis City Housing Authority in which relationships with landlords has flourished. This gives the St. Louis City Continuum of Care (CoC) the ability to have units ready and available to clients

  Additionally, the City of St. Louis outlined the establishment of four Safe Havens in its 10-Year Plan to End Chronic Homelessness. To date, the City has two operating Safe Havens and has received funding for an additional Safe Haven, which is expected to open by the end of 2013. Peter and Paul Community Services is the project sponsor. This will add 25 new PSH units to the St. Louis City CoC. HUD has announced that it will no longer fund new Safe Havens.

  The CoC takes immediate actions to provide housing for unsheltered homeless household with dependent children. Once an unsheltered family has been identified, the CoC will dispatch the mobile outreach team to conduct an assessment. The family is immediately placed in the most appropriate/available housing (hotel, shelter, or transitional housing).

  The CoC is currently increasing the occupancy rate in transitional housing for families by reducing barriers that are required to enter transitional housing. The CoC is developing plans to move eligible families from the streets to transitional housing - bypassing emergency shelter if necessary.

- **Prevention Among Individuals & Families Being Discharged from Publicly-funded Institutions:** State Mandated Policy, voted and approved by the Governor's Committee to End Homelessness (GCEH) in December of 2011. The GCEH is a Boards and Commissions committee through Executive Order of the Governor. The GCEH has a discharge workgroup that meets regularly. Each Continuum of Care in the state holds a seat on the workgroup (total of eight). The appointed member from each Continuum of Care oversees the individual discharge plan for the individual Continuum of Care.

  The State of Missouri has a mandate that requires publicly funded institutions to ensure appropriate housing placement, which does not include homelessness for children aging out of foster care.

- **Collaborations:** The St. Louis City CoC is a member of the State's interagency council, the Governor's Committee to End Homelessness (GCEH). Many of the mainstream programs are administered at the State level. These organizations are also members of

the GCEH. The CoC's goal for 2014 is to continually address foster care discharge on the local level.

Locally, the City of St. Louis will continue to work closely with the Dept of Corrections to help them to establish a more efficient discharge policy. One of the first goals is to develop an enhanced case management plan and establish a process for referring those released that are already receiving social security benefits to permanent supportive housing. The next goal will be on how to house those that do not have a disability and connect them to resources.

Also, the St. Louis City CoC is currently collaborating with the area's most-respected public and private foster and adoptive care agencies who together implemented an discharge plan for youth that are aging out of foster care; more closely with Covenant House of Missouri, Epworth Children & Family Services, Missouri Department of Social Services, Youth In Need, and the St. Louis Crisis Nursery, which are members of the St. Louis City Continuum of Care and the Foster & Adoptive Care Coalition supported by United Way of Greater St. Louis.

For those aging out of foster care, a Homeless Adolescent Task Force has been formed to bring together advocates for older homeless adolescents and provide networking opportunities for advocates and services providers in this critical area, Legal Services of Eastern Missouri's (LSEM) Homeless Adolescent Task Force will hold quarterly meetings in 2014. Organizations that participate in these meetings are primarily those that provide direct services in the greater St. Louis metropolitan area including mental health, medical, and educational services, among others, to the population of older homeless adolescents some of which are involved in the foster care system.

Lastly, in 2014 St. Louis City CoC lead agency will continue to work closely with the healthcare and mental health facilities to establish and strengthen its service plan using Assertive Community Treatment. This is critical for those that are being discharged out of hospital into homelessness and those that are currently homeless and are already receiving mental health services, but need the additional resources to help them become housed and self-sufficient.

The following agencies are stakeholders and collaborating agencies: Joplin Continuum of Care, Springfield Continuum of Care, St. Louis City Continuum of Care, St. Louis County Continuum of Care, St. Charles Continuum of Care, St. Joseph Continuum of Care, Kansas City Continuum of Care, Balance of State Continuum of Care, Department of Corrections, Department of Health and Senior Services, Department of Social Services, Governor's Council on Disabilities and Department of Mental Health.

The St. Louis City CoC is currently collaborating with the area's most-respected public and private foster and adoptive care agencies to implement a discharge plan; more closely with Covenant House of Missouri, Epworth Children & Family Services, Missouri Department of Social Services, Youth In Need, and the St. Louis Crisis Nursery, which

are members of the St. Louis City Continuum of Care and the Foster & Adoptive Care Coalition supported by United Way of Greater St. Louis.

Stronger partnerships will enhance opportunities to reduce homelessness. Several interdisciplinary collaborations will be generated or strengthened as the City moves into the HEARTH era.

- Public housing authorities may be able to prioritize homeless applicants for conventional or voucher-based housing in return for commitments from CoC members for case management and specialized services such as mental health treatment.

- St. Louis' renowned schools of social work could provide students to fill roles and offer advice from researchers concerning evidence-based practices and program quality.

- Nonprofit human service agencies, community groups and faith-based organizations can provide volunteer opportunities for unemployed participants, helping them gain work-like experience and providing basic job skills.

- School systems and veterans organizations can identify those at imminent risk of homelessness and become active HMIS users.

- For-profit companies such as, the St. Louis Credit Union, can provide critical living skills that will allow participants become educated on budgeting and finance.

These partnerships and collaborations to develop resources and services to address the homelessness epidemic in their area is the key to eradicating recidivism and ending homelessness.

The Homeless Services Division will continue its efforts to bring non-participating providers into the Continuum of Care process such as the New Life Evangelistic Center, the largest emergency shelter in the City. Many of the non-participant providers are unaware of the numerous services aimed at ending chronic homelessness.

The obstacles remain the same for addressing chronic homelessness for the residents of the City of St. Louis. The major obstacles are: Locations of services, affordable housing, pervasive client risk factors, excessive need for documents, and accountability by other jurisdictions.

The City and County have recently eliminated the residency policies that placed restrictions on sheltering those that are not residents of the respective jurisdictions and are looking at various alternatives to consolidate homeless efforts. However, neighboring jurisdictions have not invested the resources to addressing the increasing number of homeless individuals and families in their area. But, the City of St. Louis is committed to

establishing the same partnership with the other jurisdictions to assist in establishing a better system to address the homeless issue.

Activities Addressing Housing & Supportive Service Needs of Persons with Special Needs

In July 2009, the City received $8,453,865 from HUD via Title XII of the American Recovery and Reinvestment Act (ARRA) of 2009. In October 2009 the City of St. Louis took a giant leap in the battle of ending long term homelessness for families and individuals residing on the streets and in emergency shelters for months and even years by implementing the "Hope Is Moving In Initiative" under the Homelessness Prevention and Rapid Re-Housing Program (HPRP).

The funds were intended to target two populations of persons facing housing instability:

1. Individuals and families who were currently in housing but were at risk of becoming homeless and need temporary rent or utility assistance to prevent them from becoming homeless or assistance to move to another unit (prevention); and

2. Individuals and families who were experiencing homelessness (residing in emergency or transitional shelters or on the street) and need temporary assistance in order to obtain housing and retain it (rapid re-housing).

This format is currently being used as part of the Emergency Solutions Grant with establishing a four-tier service model in the form a pilot program to end chronic homeless. The program engages and serves homeless individuals and persons with special needs based on were their need is within the tier. Additionally, ESG funds will be used to assist with homeless prevention services. The City will also collaborate with other organizations toward preventing homelessness.

Program Specific Requirements for ESG

Written Standards: *Standards for targeting and providing essential services related to street outreach:*
ESG funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

For the purposes of this section, the term ''unsheltered homeless people'' means individuals and families who qualify as homeless under paragraph (1) (i) of the ''homeless'' definition under 24 CFR Part 576.2.

As outlined in 24 CFR Part 576.101, *essential services* consist of:

- Engagement;
- Case management;

- Emergency health services – only when other appropriate health services are inaccessible or unavailable within the area;
- Emergency mental health services – only when other appropriate mental health services are inaccessible or unavailable within the area;
- Transportation; and
- Services for special populations.

ESG Sub-recipients must determine an individual's or family's vulnerability and unwillingness or inability to access emergency shelter, housing, or an appropriate health facility, prior to providing essential services under this component to ensure that ESG funds are used to assist those with the greatest need for street outreach assistance.

Policies and procedures for admission, diversion, referral, and discharge by emergency.

Emergency Shelter Definition (24 CFR Part 576.2)

Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements. This definition excludes transitional housing. However, projects that were funded as an emergency shelter (shelter operations) under the FY 2010 Emergency Shelter Grants program may continue to be funded under the emergency shelter component under the Emergency Solutions Grants program, regardless of whether the project meets the revised definition.

Admission, Diversion, Referral and Discharge

ESG sub-recipients must conduct an initial evaluation of all individuals or families to determine if they should be admitted to an emergency shelter, diverted to a provider of other ESG funded components (e.g., rapid re-housing or homeless prevention assistance) and/or referred for other mainstream resources.

ESG sub-recipients must determine that individuals and families meet criteria (1), (2), (3), or (4) of the Homeless Definition and rate the individual or family's vulnerability to ensure that only those individuals or families that have the greatest need for emergency shelter assistance receive ESG funded assistance.

ESG sub-recipients must also reassess emergency shelter participants, on an ongoing basis, to determine the earliest possible time that they can be discharged to permanent housing.

Safety and Shelter Needs of Special Populations

ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under the regulations for the emergency shelter component found at 24 CFR Part 576.102.

Consistent with ESG recordkeeping and reporting requirements found at 24 CFR Part 576.500, ESG sub-recipients must develop and apply written policies to ensure the safety of program participants through the following actions:

All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;

- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and

- The address or location of any housing of a program participant, including youth, individuals living with HIV/AIDS, victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing will not be made public, except as provided under a preexisting privacy policy of the sub-recipient and consistent with state and local laws regarding privacy and obligations of confidentiality.

- In addition, ESG sub-recipients must adhere to the following ESG shelter and housing standards found at 24 CFR Part 576.403 to ensure that shelter and housing facilities are safe, sanitary, and adequately maintained:

- Lead-Based Paint Requirements: The Lead-Based Paint Poisoning Prevention Act applies to all shelters assisted under ESG program and all housing occupied by program participants. All ESG sub-recipients are required to conduct a Lead-Based Paint inspection on all units receiving assistance under the rapid re-housing AND homelessness prevention components if the unit was built before 1978 and a child under age of six or a pregnant woman resides in the unit.

- Structure and Materials: The shelter building should be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents.

- Access: The shelter must be accessible, and there should be a second means of exiting the facility in the case of emergency or fire.

- Space and Security: Each resident should have adequate space and security for themselves and their belongings. Each resident must have an acceptable place to sleep.

- Interior Air Quality: Each room or space within the shelter/facility must have a natural or mechanical means of ventilation. The interior air should be free of pollutants at a level that might threaten or harm the health of residents.

- Water Supply: The shelter's water supply should be free of contamination.

- Sanitary Facilities: Each resident should have access to sanitary facilities that are in proper operating condition. These facilities should be able to be used in privacy, and be adequate for personal cleanliness and the disposal of human waste.

- Thermal Environment: The shelter/facility must have any necessary heating/cooling facilities in proper operating condition.

- Illumination and Electricity: The shelter/facility should have adequate natural or artificial illumination to permit normal indoor activities and support health and safety.

- There should be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.

- Food Preparation: Food preparation areas, if any, should contain suitable space and equipment to store, prepare and serve food in a safe and sanitary manner.

- Sanitary Conditions: The shelter should be maintained in a sanitary condition.

- Fire Safety-Sleeping Areas: There should be at least one working smoke detector in each occupied unit of the shelter facility. In addition, smoke detectors should be located near sleeping areas where possible. The fire alarm system should be designed for a hearing-impaired resident.

- Fire Safety-Common Areas: All public areas of the shelter must have at least one working smoke detector.

Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter.

ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter. Essential services for participants of emergency shelter assistance can include case management, child care, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, transportation, and services for special populations.

ESG subrecipients are responsible to assess an individual or family's initial need for emergency shelter and must re-assess their need on an ongoing basis to ensure that only those individual or families with the greatest need receive ESG funded emergency shelter assistance.

Upon completion and implementation of the CoC's centralized or coordinated assessment system, ESG recipients shall be required to use that system to help determine an individual or families need for emergency shelter or other ESG funded assistance.

The homelessness prevention component includes various housing relocation and stabilization services and short- and medium-term rental assistance to help people avoid becoming homeless.

The rapid rehousing assistance component includes similar services and assistance to help people who are homeless move quickly into permanent housing and achieve stability in that housing.

Prevention

Housing relocation and stabilization services, short- and/or medium-term rental and utility assistance as necessary to prevent the individual or family from becoming homeless if:

- An individual or family who has an annual income below 30 percent of median family income for the area, as determined by HUD;
- Does not have sufficient resources or support networks, *e.g.,* family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place;
- Assistance is necessary to help program participants regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.
- Eligible costs include rental and utilities assistance, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.
- Residents' assistance can not exceed $1,400/household and/or participant. Participants may not receive more than 18 months of financial assistance based on FMR via the Emergency Solutions Grant (ESG) during any 3-year period.
- Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.
- Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD.
- FMR limits, rent reasonableness standards, housing habitability standards, and lead-based paint regulations apply. When providing homelessness prevention services only assistance – housing search and placement, housing stability case management, mediation, legal services, and credit repair – to keep a program participant in the same unit, a lead-based paint assessment is not required.
- Rental assistance agreement (between recipient/sub-recipient and owner) and written lease agreement (between program participant and owner) are required. (When assistance is for arrears only, an oral lease may serve as documentation.)
- Rental assistance cannot be provided to a program participant that is receiving Tenant-Based Rental Assistance or living in a unit receiving Project-Based Rental Assistance or

operating assistance through other public sources (exception applies to rental arrears on tenant's portion of rental payment).

- Provider agencies can only make rental assistance payments to an owner with whom the agency has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the agency a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The agency is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

- Program orientation is required of all participants.

Rapid Re-Housing

Housing relocation and stabilization services and short- and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

- An individual or family who meet the definition of homelessness as determined by HUD;

- Does not have sufficient resources or support networks, *e.g.,* family, friends, faith-based or other social networks, immediately available to assist them;

- Assistance is necessary to help program participants regain stability by moving into permanent housing and achieve stability in that housing.

- Eligible costs also include rental and utilities assistance, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, moving costs, and credit repair.

- Financial assistance for all assistance can not receive more than 18 months of assistance based on the FMR of the units for which the residents reside. Participants may not receive more than 18 months of financial assistance based on FMR via the Emergency Solutions Grant (ESG) during any three-year period.

- Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving

tenant-based rental assistance, or living in a housing unit receiving project-based rental assistance or operating assistance, through other public sources.

- Rental assistance cannot be provided unless the rent does not exceed the Fair Market Rent established by HUD.

- FMR limits, rent reasonableness standards, housing habitability standards, and lead-based paint regulations apply. When providing homelessness prevention services only assistance -- housing search and placement, housing stability case management, mediation, legal services, and credit repair -- to keep a program participant in the same unit, a lead-based paint assessment is not required.

- Rental assistance agreement (between recipient/sub-recipient and owner) and written lease agreement (between program participant and owner) are required. (When assistance is for arrears only, an oral lease may serve as documentation).

- Rental assistance cannot be provided to a program participant that is receiving Tenant-Based Rental Assistance or living in a unit receiving Project-Based Rental Assistance or operating assistance through other public sources (exception applies to rental arrears on tenant's portion of rental payment).

- Provider agencies can only make rental assistance payments to an owner with whom the agency has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided, including the requirements that apply under this section. The rental assistance agreement must provide that, during the term of the agreement, the owner must give the agency a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease. The agency is solely responsible for paying late payment penalties that it incurs with non-ESG funds.

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for rental arrears. The lease must be between the owner and the program participant. The rental assistance agreement must have an initial term of one year.

Description of CoC

Membership is open to any individual or organization committed to ending homelessness. An organization may have several delegates; however at least one delegate should function in an executive or managerial level role for that particular organization. Executives are encouraged to attend meetings in order to disseminate information or ideas discussed at meetings to front-line staff.

Although an organization may have multiple delegates, each organization only has one vote. Each organization is required to join one of the six committees. Annually, each member organization renews its membership and submits the names of authorized delegates. The annual renewal process helps maintain the most up-to-date information for each organization. The City of St. Louis is currently performing the roles of the Unified Funding Agency and the Collaborative Applicant. The roles include monitoring CoC and ESG programs and conducting the CoC's monthly meeting and having written agendas for meetings.

The St. Louis City CoC has had a centralized assessment for over 20 years. The centralized assessment includes an intake process at the centralized homeless hotline managed by Catholic Charities Housing Resource Center and centrally input into the HMIS ROSIE. All clients must call the centralized homeless hotline in order to access services by City funded agencies. City funded Domestic Violence agencies are required to input information into the HMIS, but client identification information can be hidden from general users. Agencies are encouraged to participate in HMIS even if they do not receive funding from the City, but are still a member of the CoC.

Process for Making Subawards

ESG funds will be used in the Department of Human Service's existing shelter, outreach, data collection homelessness prevention and rapid re-housing contracts. This requires some internal processing with the Budget Division but does not affect the contracts or contracting process. Some of the funds will be used directly by DHS for its staff who perform outreach, prevention, rapid re-housing and administrative activities.

The CoC makes subawards using the open solicitation methods such as Outreach to Faith-Based Groups, Responsive to Public Inquiries, Letters/Emails to CoC Membership, Newspapers, Announcements at Other Meetings, and Announcements at CoC Meetings.

The CoC uses rating and performance assessment measure(s) when evaluating renewal and new projects such as Site Visit(s), Assess Provider Organization Capacity, Evaluate Project Presentation, Evaluate Project Readiness, Review Match, Review CoC Membership Involvement, Review HMIS participation status, Review All Leveraging Letters (to ensure that they meet HUD requirements), Assess Cost Effectiveness, Assess Provider Organization Experience, Assess Spending (fast or slow), Review CoC Monitoring Findings, CoC Rating & Review Committee Exists, Review Unexecuted Grants, Review HUD APR for Performance Results, Review Independent Audit, Review HUD Monitoring Findings.

The CoC uses several procedures to rate and rank project applications such as:

- The CoC's Review and Ranking Committee performs threshold review of all projects seeking support from the Department of Human Services. All agencies are advised of whether the project meets basic criteria.

- Secondly, the entire CoC ranks each project based on the community's need, access to programs, willingness to collaborate, etc. New programs/agencies seeking funding are required to submit a proposal and make a presentation to the entire CoC.

- Lastly, by City ordinance, the Professional Services Agreement (PSA) Committee makes the final determination to which agencies will receive funding.

New programs/agencies seeking funding are required to submit a proposal and make a presentation to the committee.

Homeless Participation Requirement

It is written in the agency's ESG contract that the Contractor agrees to ensure homeless participation in the ESG program through:

1. Providing 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, 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); and

2. To the maximum extent practicable, involving homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services.

The Consumer Council is composed entirely of homeless and formerly homeless persons. It makes recommendations as appropriate to the CoC and to providers of services and housing. The Council works with the Advocacy Committee to identify consumer needs, to improve current services, and to give consumers a voice in the CoC and the public at large by, among other things, executing an annual Homeless Programs Survey.

Performance Standards

While the City's Community Development Administration (CDA) retains primary local responsibility for the ESG program, the programmatic responsibility for the ESG rest with the City of St. Louis Department of Human Services (DHS) which is the lead entity for the St. Louis City CoC.

DHS will utilize its experience from its successful implementation of HPRP to evaluate ESG activities. DHS shared this framework with the Continuum of Care (CoC) Executive Board and will review periodically with the CoC HMIS User Group. The City of St. Louis consulted the CoC Ranking and Review committee to develop performance standards that will provide a measure for the City and the Continuum of Care to evaluate each ESG service provider's effectiveness, such as how well the service provider succeeded at: 1) Targeting those who need the assistance most; 2) reducing the number of people living on the streets or emergency shelters;

3) shortening the time people spend homeless; and 4) reducing each program participant's housing barriers or housing stability risks. In 2013, the City of St. Louis received assistance from HUD assigned technical assistance consultants to formalize standards that was integrated into a report card within the HMIS system. The report card is used to review and monitor the agencies' progress and performance. It is proposed that the report card will be published on a monthly basis, taking a 30-day snapshot of all programs individually and the performance of the CoC collectively. Following is the list of standards used to measure the performance of the agencies:

1. The percentage of formerly homeless individuals who remain housed in HUD permanent housing projects for at least 6 months

2. The percentage of homeless persons who have moved from HUD transitional housing into permanent housing

3. The employment rate of persons exiting HUD homeless assistance projects

4. The creation of new permanent housing beds for chronically homeless individuals

5. The number of homeless households with children

6. The percentage of persons since program entry who have increased income

7. The percentage of persons since program entry who have maintained income

8. The percentage of persons since program entry who have decreased utility debt

9. For all programs, highest, lowest and average utilization rates

10. Frequency and timeliness of HMIS data input

Performance targets will be developed for each local standard while incorporating the targets outlined by HUD for the national indicators. CoC programs will be measured against the developed targets.

Explanation of Local Standards above:

6. The percentage of persons since program entry who have increased income

Gaining income is essential to any person's self sufficiency and ability to maintain a home regardless of assistance. Housing and supportive services programs should aim to assist participants with attaining income prior to program exit.

7. The percentage of persons since program entry who have maintained income

The CoC recognizes that not all persons have the opportunity to increase their income. Therefore, it is essential that such persons are able to maintain what income they have been able to previously attain.

8. The percentage of persons since program entry who have decreased utility debt

Existing utility debt is often a major barrier to permanent housing for homeless persons. Programs should work with clients and utility companies to decrease utility debt.

9. For all programs, highest, lowest and average utilization rates

It is imperative that programs fulfill their contracted service capacities. The ability of a program to serve according to their stated intent will affect the program's opportunity for funding renewal in subsequent contract years.

10. Frequency and timeliness of HMIS data input

To ensure that CoC agencies can collaborate effectively and that the homeless population can access services efficiently and quickly, programs must adhere to frequent and timely HMIS reporting standards. Practices of extensive backdating and inadequate data input will be tracked.

Consultation with CoC

The CoC Lead Entity chairs the CoC and is also responsible for the Emergency Solution Grant. This ensures continuity in the planning process. The CoC Chairperson/Lead serves on several local, state-wide and regional committees. The CoC Chairperson/Lead is employed by the City of St. Louis. This structure enhances access and collaboration with to local, state-wide and regional elected officials, public housing authorities, businesses, public safety organizations, non-profit agencies and faith-based organizations.

More specifically, the City of St. Louis is a part of a joint St. Louis Housing Funders Group lead by the St. Louis Mental Health Board. The group consists of various funding agencies that providing funding to non-profit agencies for permanent supportive housing as part of a five year strategy to increase the availability of supportive housing for persons with behavioral health disorders, mental health issues, and those that are homeless and chronically homeless, while improving access to newer evidence-based services.