Fourth Program Year Action Plan

The CPMP Third Annual Action Plan includes the SF 424 and Narrative Responses to Action Plan questions that CDBG, HOME, HOPWA, and ESG grantees must respond to each year in order to be compliant with the Consolidated Planning Regulations. The Executive Summary narratives are optional.

Narrative Responses

GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

Program Year 4 Action Plan Executive Summary:

Executive Summary starts on the next page.

Please note that this document refers to the City of Tucson's Fiscal Year 2014, which reflects HUD's 2013 appropriations.

What is the Action Plan?

The U.S. Department of Housing and Urban Development (HUD) requires communities that receive federal funding, listed below, to submit Annual Plans. The Plan describes activities that will be funded in FY 2014 to meet the goals stated in the 2010-2015 Consolidated Plan. These goals address: Affordable Housing, Homelessness, Community Development and Non-Homeless Special Needs. The City of Tucson's 2014 Action Plan details the goals and funding priorities for Program Year 2014, to continue the City's efforts in improving the quality of life for Tucson's low- and moderate-income residents through enhancing the physical environment as well as providing direct benefits that will result in improved housing opportunities and enhanced quality of life. The Plan lists the City's allocations, goals, objectives and performance measures for FY 2014. *(Please note: these allocation numbers are preliminary and subject to change by HUD)*

HUD Formula Grant Programs	**$ 8,788,755**
Community Development Block Grant (CDBG):	**$ 5,104,483**
Reprogrammed funds	**$ 335,000**
Total Community Development Block Grant Funds:	**$ 5,439,483**

CDBG funds will be used for a variety of housing and community development activities that benefit low- and moderate-income persons.

HOME Investment Partnerships Program (HOME):	**$ 2,320,009**

HOME funds, leveraged with local general funds, will be allocated for new construction and acquisition projects as well as down payment assistance to preserve and improve the supply of affordable housing.

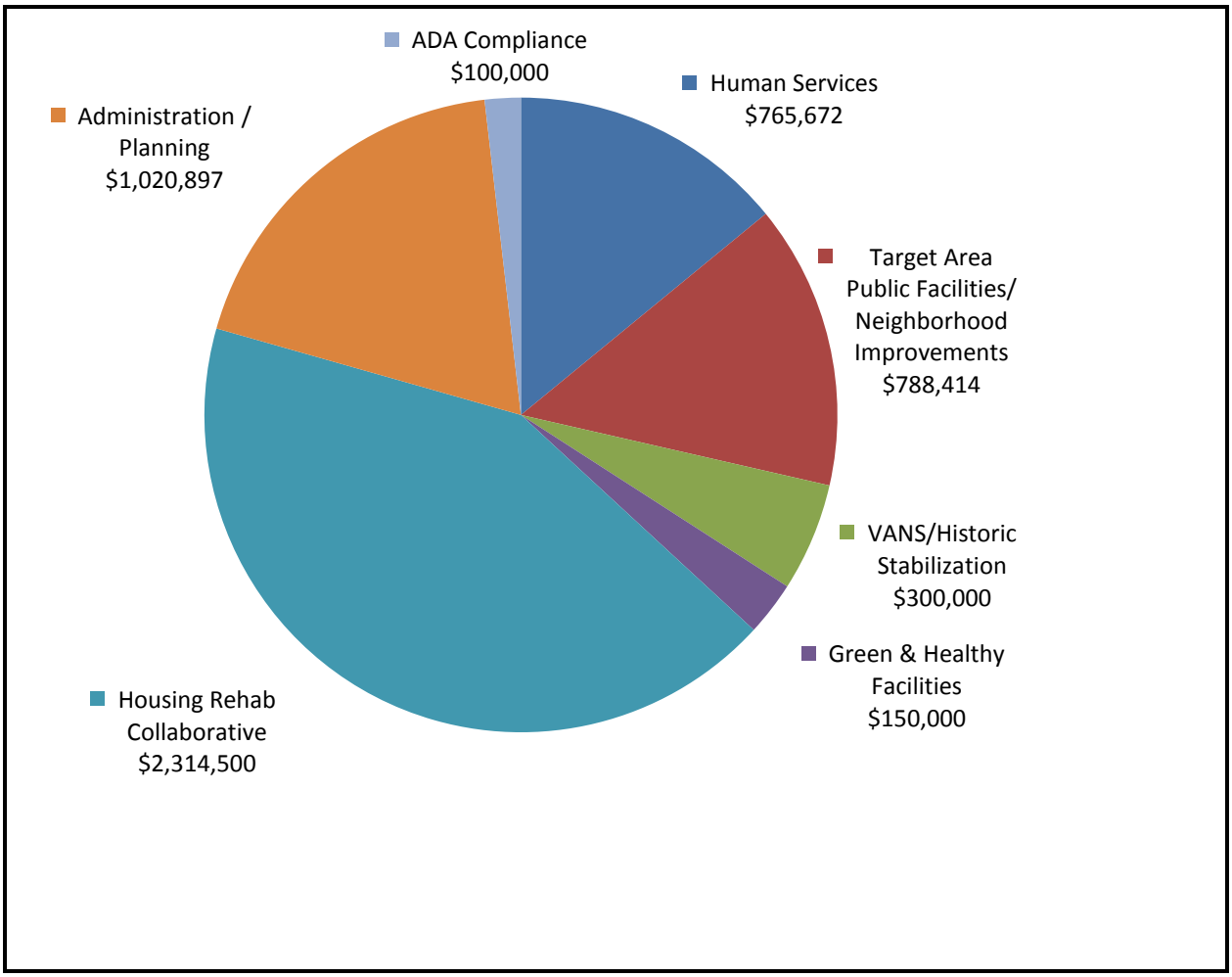
Emergency Solutions Grant program (ESG):	**$ 606,906**

ESG funds will be applied to shelter operating expenses and services to assist shelter residents.

Housing Opportunities for Persons with AIDS (HOPWA):	**$ 422,357**

The City will contract with the Southern Arizona AIDS Foundation (SAAF) to provide housing and case management services.

CDBG Funds: (includes reprogrammed funds from prior years)



HOME Funds:

HOME entitlement grants are based on the needs of the City of Tucson and Pima County Consortium. The Consortium is expected to receive **$ 2,320,009** in FY 2014 (notification of final allocation has not been made at this time), assuming a 7% reduction.

The City will fund the following activities with **$1,318,502** in HOME project funds.

Program	Activity	Amount
Housing Development	Develop affordable ownership units	$250,000
Rental Development & Preservation	Develop & preserve rental units	$1,058,502
Tenant Based Rental Assistance	Security & Utility Deposits for clients in City of Tucson Housing Assistance Division Specialty Programs: VASH/Family Unification/51 Homes/NED-2 (non-elderly disabled)	$10,000
TOTAL		**$1,318,502**

Emergency Solutions Grant (ESG) Funds:

The following table shows how the City's **$606,906** entitlement will be used in FY 2014. These funds were allocated through a Request for Proposals (RFP) process which included Continuum of Care participation.

Agency	Project	Emergency Shelter Support	Homeless Prevention	Rapid Re-housing	Street Outreach	HMIS	Admin
CODAC	Project Recovery			$45,000			
Emerge! Center Against Domestic Abuse	Rapid Re-housing for Survivors of Domestic Abuse	$41,583		$96,000			
Esperanza En Escalante	Shelter Plus Care Homelessness Prevention		$41,380				
Our Family Services, Inc	New Beginnings Homeless Prevention Program		$69,541				
Old Pueblo Community Services	Street Outreach for Homeless				$32,675		
Open Inn	Emergency Assistance and Shelter	$ 38,902					
Our Family Services, Inc.	Rapid Rehousing			$ 85,954			
Primavera Foundation	Emergency Family Shelter	$75,353					
The Salvation Army	Hospitality House Emergency Shelter	$ 30,000					
Pima County	HMIS					$5,000	
City of Tucson	Administration						$45,518
Total	**$606,906**	**$185,838**	**$110,921**	**$226,954**	**$32,675**	**$5,000**	**$45,518**

A complete description of programs for persons who are experiencing homelessness can be found on page 31 of the Annual Plan. The City/County ESG Policy Manual is attached as Appendix A to this document.

Housing Opportunities for People with AIDS (HOPWA) funds:

A total of $422,357 is available for programs that provide housing opportunities to people with AIDS. The City will contract with Southern Arizona AIDS Foundation (SAAF) for $409,686 to provide the following services to people living with HIV/AIDS (includes $43,996 for City of Tucson Section 8 /TBRA):

Housing Subsidy Assistance, including:

- Short-term rent, mortgage and utility assistance
- Short-term facility assistance for emergency shelter vouchers
- Rental assistance for tenant-based permanent housing units
- Permanent Housing Placement assistance

Supportive services including case management and transportation assistance

Evaluation of Past Performance

In the 2010-2015 Consolidated Plan, the City of Tucson established annual and five-year goals and priorities for low-income populations. The following chart lists the stated goals and the City's accomplishments toward meeting those goals.

Accomplishments

Activity	Annual Goals	FY 2011	FY 2012	Cumulative Totals	Five-Year Goals
New Homeownership Opportunities	165 units	216 units	319 units	535	825 units
Homeowner Assistance Rehabilitation	474 households	375 Households	474 households	849 Households	2,370 households
Rental Production	184 units	214 units	478 units	692 units	920 units
Assistance to persons who are experiencing homelessness	30,000 units of service	10,251 persons assisted (100,000+units of Service)	9,440 persons assisted (100,000+ units of service)	20,383 persons assisted (over 200,000 units of service)	150,000 units of service
Assistance to Persons with Special Needs	6,205 persons assisted	6,351 persons assisted	6,549 persons assisted	12,900 persons assisted	31,025 persons assisted
Public Services (human services)	37,900 persons assisted	37,072 persons assisted 25,811 (CDBG) 1,547(ESG) 9,714 (General Funds)	38,930 persons assisted 23,911 (CDBG) 1,371(ESG) 13,648 (General Funds)	76,002 persons assisted	189,500 persons assisted
Non-Housing Community Development Neighborhood Revitalization (public facilities) Includes Historic Preservation/ Spot Blight mitigation /demolition	22 facilities/ projects	5 facilities, 7 underway 7 projects, 10 underway	4 facilities, 17 underway (several nearing completion) 7 projects, 10 underway	23 facilities/ projects	60 facilities/ projects
Infrastructure	0-1 project	0 miles	0 miles	0 projects	3 projects

Housing Production and Rehabilitation - Housing quality and affordability affects households and neighborhoods, and is a major contributor to what makes a city function well. Housing that is safe and affordable is crucial to a healthy, vibrant community. Without it, there is an increase in homelessness, public assistance and criminal behavior, as well as a decline in educational performance and proper nutritional health.

Since the peak in 2006/2007, the Tucson-area median sales price has dropped $60,000 or 27%, creating the potential for a larger pool of low-income buyers to enter the Tucson homeownership market. In 2011, the median priced unit was within reach of nearly one-half of Tucson area households and the assistance

required by a moderate income buyer was reduced to $36,200 from $95,600. This gap makes multiple strategies to assist first-time homebuyers appropriate, including down payment assistance and interest rate buydowns. At the same time, stricter underwriting criteria and competition from real estate investors continues to hamper the purchasing efforts of Pima County's low and moderate income households. Homeownership Housing Objectives for this 5-year Consolidated Plan period include:

1. Rehabilitate and/or replace 2,370 existing substandard housing units, including historic preservation and lead abatement.
2. Utilizing CDBG, HOME and local resources, support pre-purchase and post-purchase financial and housing counseling and education programs for 2,000 households.
3. Coordinate housing counseling and education resources with down payment, closing cost and new development funding to assist 850 homebuyers. Offer counseling and education to owners in gentrifying areas.
4. Acquire and rehabilitate 450 foreclosed properties (through NSP) for purchase by households, including middle-income households.

The City of Tucson is on track to meet these 5-year goals.

Homeless - According to the Annual Homelessness in Tucson/Pima County Report for the 10/1/11-9/30/12 period, 8,376 unduplicated individuals utilized homeless services at some point during the 12-month period. Of this population, 75% were adults and 25% were children under age 18. It is estimated that at one point in time, during the year 2,877 total unduplicated persons were homeless and staying in shelter, permanent housing or on the streets. City staff will continue working with the Tucson/Pima Collaboration to End Homelessness (TPCH) to develop policies and coordinate comprehensive planning in support of the Continuum of Care, the Ten Year Plan to End Homelessness and the TPCH Strategic Plan. The City of Tucson has a goal of providing 30,000 units of service to homeless persons each year (these include bed nights, case management, emergency assistance, employment & training, housing vouchers, and food & clothing). That goal was met and exceeded in FY12 as 9,440 homeless individuals were assisted with over 100,000 units of service, including: case management, bed nights, employment, food and other crisis assistance. Consolidated Plan goals and strategies are designed to support these goals and priorities. In addition, the 5-year consolidated plan includes the goal of adding 200 transitional and permanent supportive housing units.

Special Needs – The likelihood of having a disability increases with age. In light of the aging of the Baby Boomers and increasing life expectancies, the City can expect an increase in the number of people with disabilities. Programs available in the community to assist this population include: home repair, retrofitting for handicapped accessibility, reverse mortgage counseling and loans, transportation assistance, and housing for persons living with serious mental illness and HIV/AIDS. This past year, we met our annual goal, having served 6,549 individuals.

Community Development (non housing needs) – The goals with regard to public facilities were met and there are many projects currently in varying stages of completion. Demolition production was slightly less than projected; however several projects are under historical review which may result in preservation rather than demolition. In FY 2013, the City of Tucson continued funding historic preservation activities. Many projects are in process and will be completed this year. Most of these were under the slum/blight category and restoration of these sites will serve to enhance and stabilize the neighborhoods in which they are located.

Public/Human Services - Public services address the needs of families and individuals that have difficulty maintaining a basic level of security. Over this past year, a total of 38,930 persons were served with a combination of CDBG, ESG and General Funds. This number exceeded the stated goal of 37,900 persons.

Objectives and Outcomes

The City of Tucson has incorporated the CPD Outcome Performance Measurement System thereby ensuring that all activities have clearly defined objectives and outcomes. For example, the City intends to fund thirteen programs administered by nine agencies that comprise the Housing Rehabilitation Collaborative in the amount of $2,314,500 to provide housing rehabilitation services under the objective of Decent Housing with a primary outcome of Sustainability and a secondary outcome of Affordability. Twelve human service projects will be funded with CDBG in the amount of $765,762 under the objective of a Suitable Living Environment with an outcome of increased Availability/Accessibility. An additional $1,475,914 will be applied to projects that have the objective of Suitable Living Environment through public enhancements in low mod areas, including historic stabilization through VANS.

The following table summarizes the proposed objectives and outcomes for FY 2014.

Activity	Amount	Objective	Primary Outcome
Public/Human Services	$765,672	Suitable Living Environment	Sustainability
Housing Rehabilitation Collaborative	$2,314,500	Decent Housing	Sustainability
VANS/ Historic Stabilization	$300,000	Decent Housing	Sustainability
Neighborhood / Public Enhancement to include: public facilities, accessibility, green & healthy, neighborhood revitalization, historic preservation	$1,038,414	Suitable Living Environment	Availability Accessibility
Administrative funds, to include Planning	$1,020,897	Suitable Living Environment	Sustainability

The projects table at the end of this report identifies the individual projects and agencies that will assist in carrying out our identified objectives.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed during the next year. Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.
2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) during the next year and the rationale for assigning the priorities.
3. Describe actions that will take place during the next year to address obstacles to meeting underserved needs.

4. Identify the federal, state, and local resources expected to be made available to address the needs identified in the plan. Federal resources should include Section 8 funds made available to the jurisdiction, Low-Income Housing Tax Credits, and competitive McKinney-Vento Homeless Assistance Act funds expected to be available to address priority needs and specific objectives identified in the strategic plan.

Program Year 4 Action Plan General Questions response:

GEOGRAPHIC AREAS OF THE JURISDICTION

Tucson is the second largest city in Arizona, covering approximately 227 square miles. It is the central city of the metropolitan area. New residents come to Tucson not only from elsewhere in the United States and from Mexico, but also from all over the world. The proximity of Mexico and the presence of the University of Arizona and Davis-Monthan Air Force Base are major factors in Tucson's continuing attraction to residents from other countries, strengthening the international flavor of the community.

In many ways, Tucson follows national trends: the average age of the population of the United States is growing older, just as it is in Tucson. Traditional families are becoming fewer and working moms are more commonplace.

Tucson is also unique. During ordinary economic times, its population grows at a higher rate than the national average. Tucson is more ethnically diverse, with the Hispanic population three times larger than in the rest of the nation, as evidenced in the map located on page 10. There is a higher proportion of people 65 years and older. Tucsonans move more frequently, and are more likely to rent housing than are residents in most of the United States.

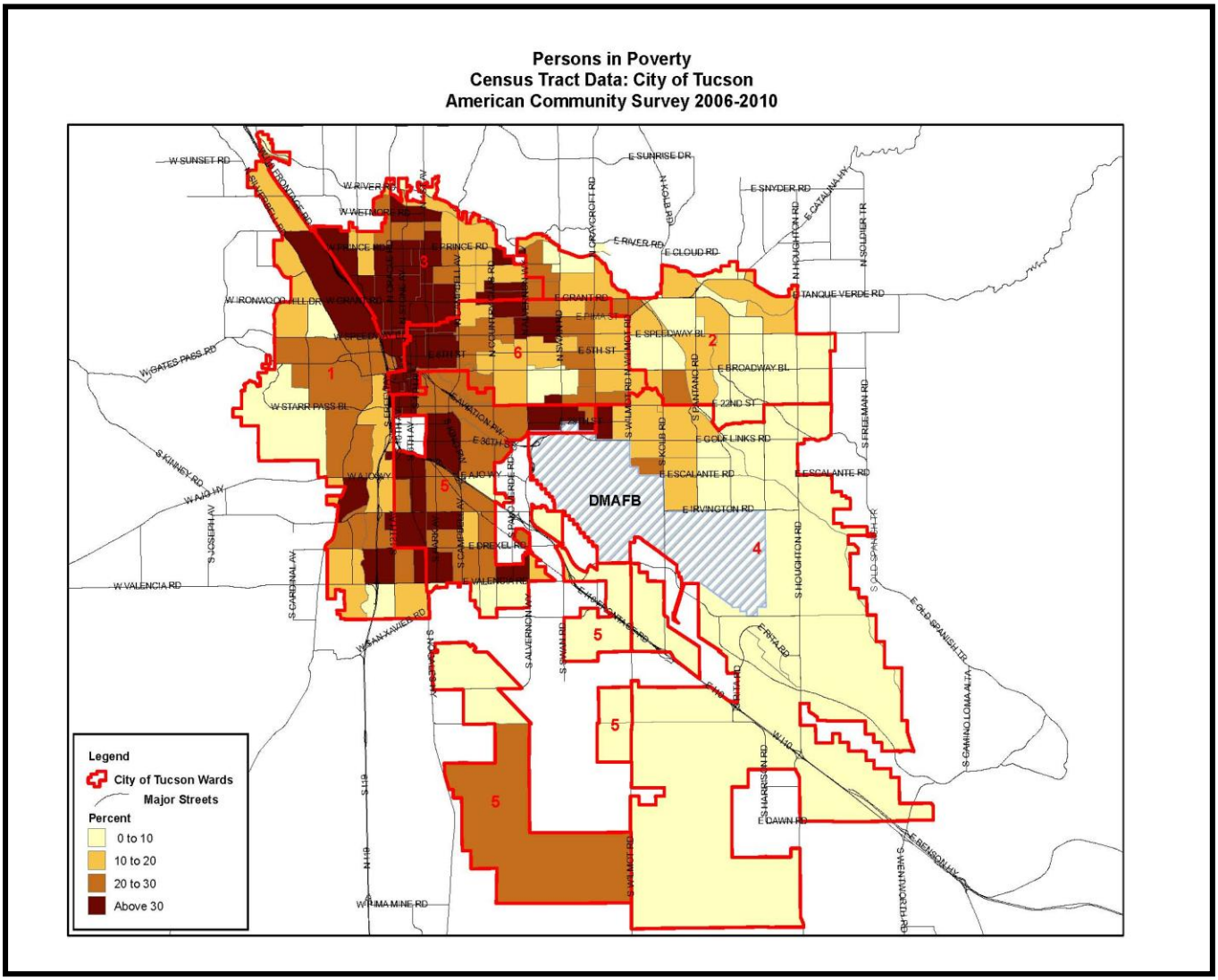
Trends in Poverty

Poverty rates and the number of people in poverty are important means of measuring a community's well-being. The most recent American Community Survey (ACS) report on poverty providing 2011 data ranks the Tucson Metro area as the sixth-poorest large metro area in the nation with an overall poverty rate of 20.4%. In 2000, Tucson's poverty rate was high, 18.4%, compared to 12.4% for the nation. Children comprise the largest group of people living in poverty. According to the 2009-2011 American Community Survey, 25.3% of the City of Tucson's population lives in poverty, compared to 15.2% for the nation. Of those in poverty in Tucson, 33.6% are children, 13.3% are seniors and 24.6% are working age adults. The highest rate of poverty (27.9%) is among families with children. Consolidated Plan funds (except HOPWA) will generally be targeted toward this population or toward activities that benefit residents of low-income areas of the City. City staff has taken a comprehensive look at poverty in Tucson. The 2012 Poverty and Urban Stress Report can be found here:
http://cms3.tucsonaz.gov/files/hcd/PovReport2012final.pdf

POVERTY AND TRENDS IN POVERTY (2000 – 2011) CITY OF TUCSON						
People in Poverty	2000			2009-2011		
	Total Pop.	In Poverty	% in Poverty	Total Pop.	In Poverty	% in Poverty
Population	469,210	86,532	18%	522,465	132,184	25.3%
Children Age 0 – 17	116,566	28,318	24%	119,282	40,079	33.6%
Adults Age 18 – 64	312,913	51,921	17%	340,460	83,753	24.6%
Adults Age 65+	57,112	6,293	11%	62,723	8,342	13.3%

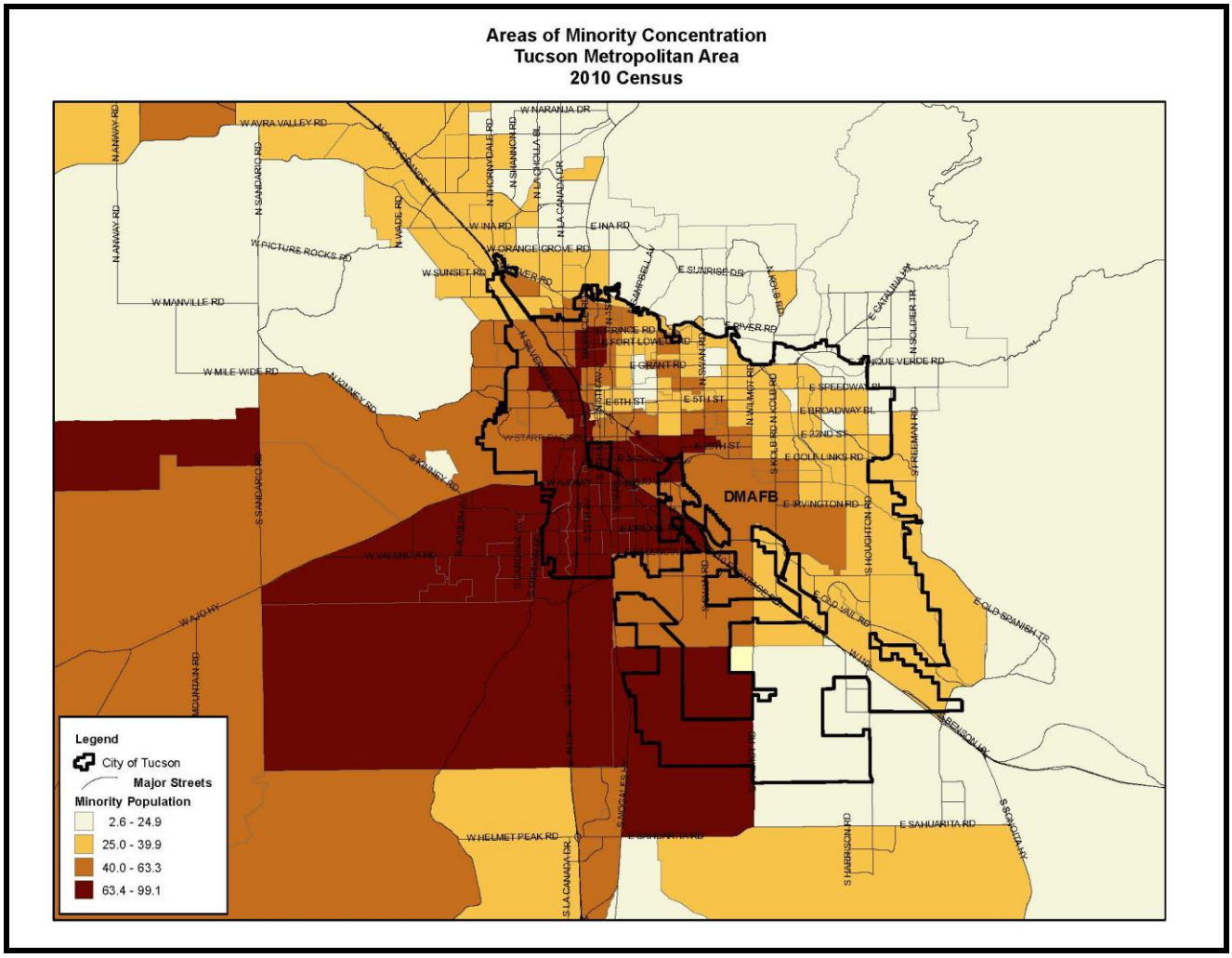
Source: Census 2000; American Community Survey 2009-2011 3-yr estimate

Persons in Poverty

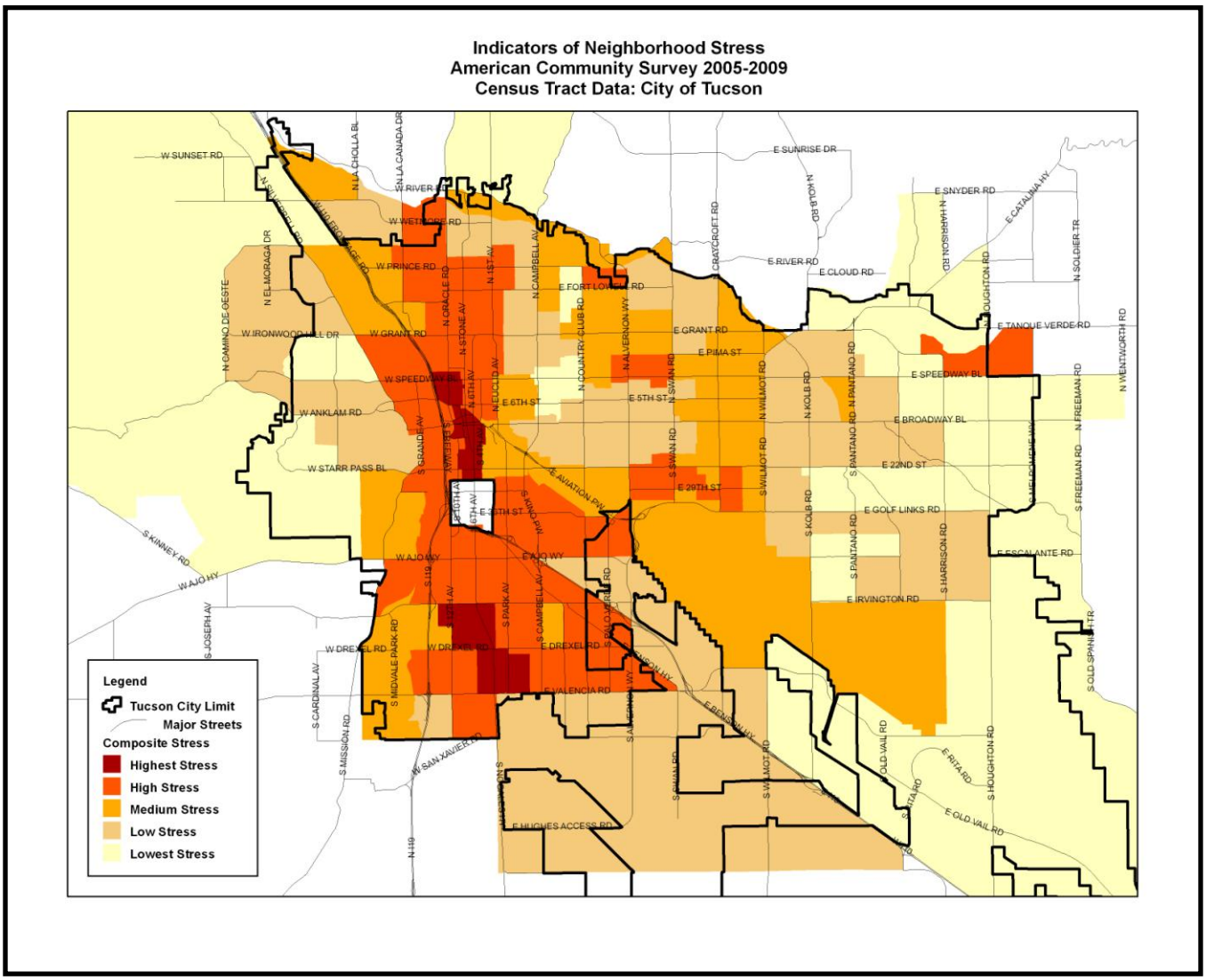


Areas of Minority Concentration

Calculations from the 2010 Census Redistricting data (PL 94-171), indicate that 47.2% of the City of Tucson population is white, non-Hispanic and 52.8% is minority. Hispanics are Tucson's largest minority group. In 2000, Tucson's Hispanic population was 35.7%. The 2010 Census showed an increase to 41.6%. The 2011 American Community Survey shows that Hispanics comprise 42.2% of Tucson's Population.

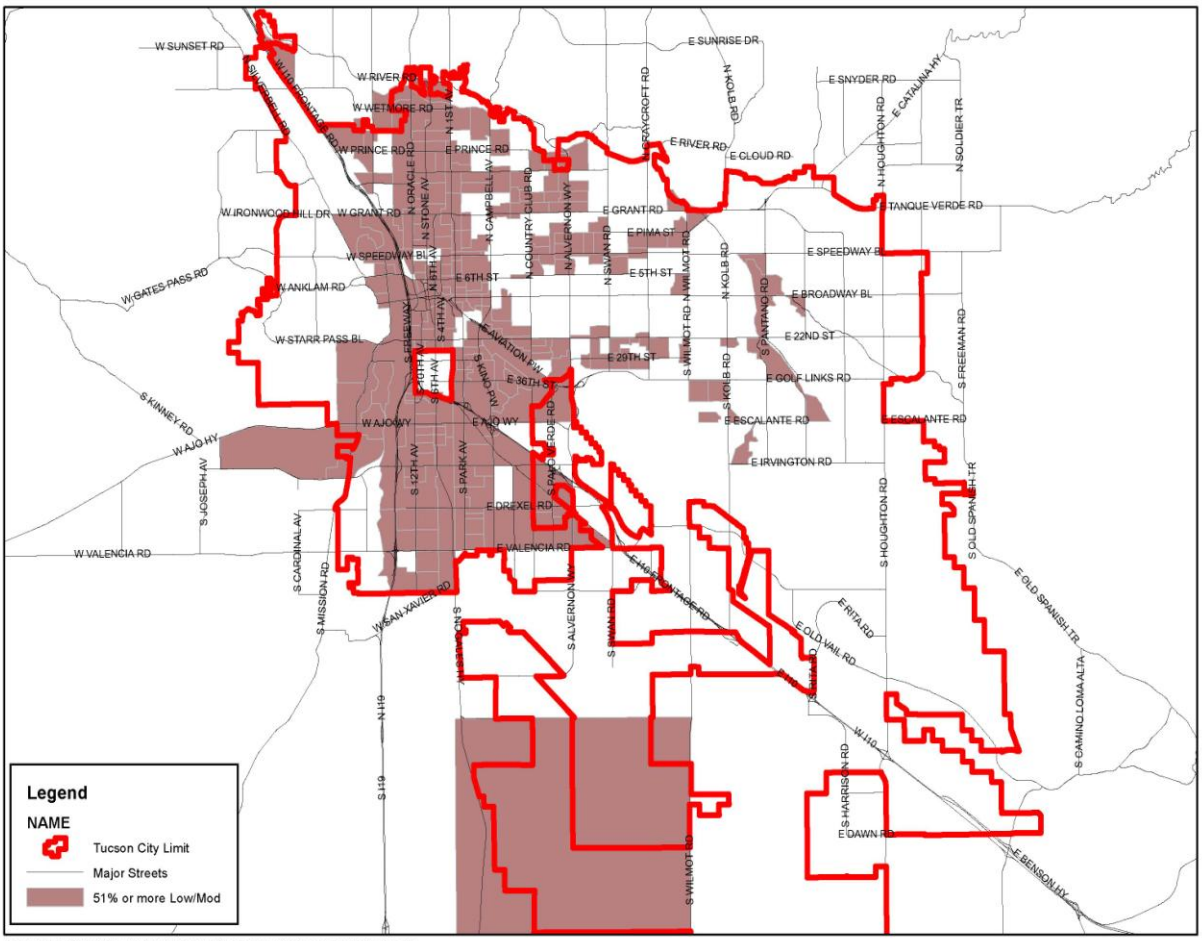


Beginning with the 1980 Decennial Census, the City of Tucson has analyzed data from the Census of Population and Housing every decade. Variables examined reflect housing and social conditions that indicate dependency and need. They relate to economic status, shelter costs and conditions and dependency. The American Community Survey (ACS), for which data became available in 2004, now provides the socioeconomic data utilized in the Indicators of Stress. The 2005-2009 ACS provided data at the tract and block group level for the first time. Variables were selected that were consistent with previous studies. The geographic scale chosen was census tract rather than the former use of census block groups, due to sampling error. The indicators measure census tracts against the average condition of the City as a whole. The statistical method used measures areas in standard deviation units from the mean of the city. Each variable contributes equally to the overall composite score, since there is no credible basis for differential weighting. The most recent stress map identifies areas of need that correlate strongly with the low/moderate income areas displayed on the low/moderate income areas map presented on the following page.



The map below shows 2011 data for block groups with 51% or more low/moderate income persons. An analysis of this data indicates that 50% of City of Tucson residents qualify as low/moderate income according to HUD's definition: earning less than 80% of the area median income.

City of Tucson Block Groups with 51% or more Low/Moderate Income Population



Source: HUD 2011 Data, http://www.hud.gov/offices/cpd/systems/census/lowmod/index.cfm

BASIS FOR ALLOCATION OF FUNDING

The investments of City entitlement funds in areas of minority concentration is estimated to be broadly distributed and relatively high, as most of the City's entitlement supported programs are open to income-eligible residents city-wide.

The City allocates funding in several ways to ensure investment in areas of minority concentration:

1. Funds allocated to the Housing Rehab Collaborative are distributed to agencies that provide services on a city wide basis.

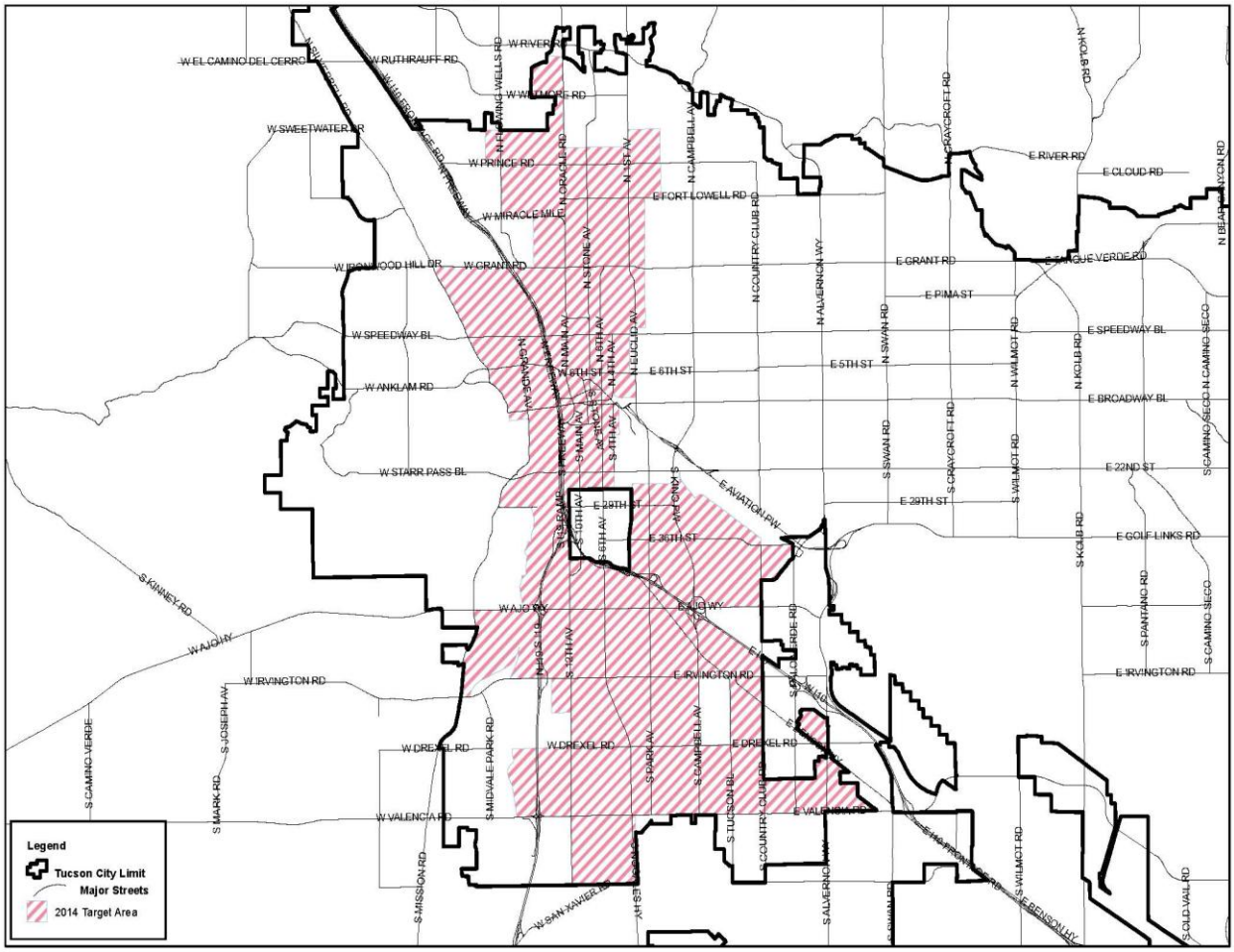
2. Public Services funds from the City's CDBG entitlement are directed to citywide programs. This is intended to provide access to services to a broad spectrum of clients. Clients who are also residents from areas of minority concentration may receive services in an area of minority concentration or at a location where the service is offered, outside of an area of minority concentration. In either case, entitlement funds are directed to benefit residents of minority concentration areas. The City has more specific information about clients served at the end of the fiscal year when the Consolidated Annual Performance and Evaluation Report (CAPER) is prepared.

3. The City will fund public facilities projects under the CDBG program which are located in the designated FY 2014 Target Area. This area was identified in response to the Mayor and Council's observations following their review of the Poverty and Urban Stress Report. They were concerned with the continued high-poverty/high-stress areas in the central core of the city. Mayor and Council suggested that investment of Community Development funds in high stress areas should be a focus. As a result, in the HCD 2014 Annual Action Plan, staff is proposing a target area as a focus for certain CDBG funds. The target area consists of contiguous high-stress, low/mod income areas in the city core. This area is both a low-income and high minority concentration area. The City will make these investments to upgrade facilities in areas where there is a disproportionate need or a disparity in the facilities available to the surrounding area. The goal is to direct funding into this area for several years to assist in the revitalization of the area.

FY 2014 CDBG Target Area

The map below shows the City of Tucson FY14 target area for public facilities projects. The area is comprised of high-stressed census tracts which contain 51% or more low/moderate income populations. Within the target area, 69.2% of the population is low/moderate income and 33.4% of the target area population is below poverty. Within the target area, 77.8% of the population is minority.

FY 2014 CDBG Public Facilities Target Area
(High Stress & 51% or more Low Mod)



Census Tracts in Target Area (2010 tracts):

1.00	2.00	3.00	4.00	9.00	10.00	11.00	12.00	13.02
13.03	13.04	14.00	21.00	22.01	22.02	24.00	25.01	25.04
26.02	26.03	26.04	37.02	37.04	37.05	37.06	37.07	38.01
38,02	39.02	39.03	41.15	41.16	41.17	41.22	45.05	45.08

Meeting the Needs of the Underserved

Tucson strives to meet the underserved needs of the community. This is accomplished through programs and services to homeowners, renters, and persons who are experiencing homelessness.

Homeowners
The Tucson Housing Rehabilitation Collaborative works together in the furtherance of the following goals:

- incorporation of home maintenance education and preventive care in housing rehabilitation programs;
- streamlining of the application process for eligible households to apply and receive housing rehabilitation assistance;
- enhancing resources; and
- applying for a portion of the annual CDBG allocation to fund the coordinated strategy.

Renters
Housing Choice Voucher Program – At least 75% of the families who are admitted into the Voucher Program must be extremely low-income, meaning those with incomes at or below 30% of the area median. The Tucson area median income is $59,900 (HUD FY 2013 Income Limits).

In FY 2014, the City of Tucson will provide 4,230 Housing Choice Vouchers for Tucson and an additional 807 for Pima County. These figures include several specialty programs for specific populations and represent a reduction of 8% from FY 2013.

Public Housing – The City of Tucson will provide 1,505 public housing units in FY 2014. Applicants must be below 50% AMI to qualify. At least 40% of new admissions must be below 30% AMI.

Homeless
Other programs that assist renters and persons who are experiencing homelessness include: Low-Income Housing Tax Credits, HOME-funded Rental Housing Partnership, VANS, El Portal, Shelter Plus Care, HOPWA, Positive Housing Opportunities, and Pathway Supportive Housing.

Lead Hazard Control Program (LHCP)
The City of Tucson is currently implementing a Lead-Based Paint Hazard Control Program. An initial award was made in November 2007 in the amount of $3 million. The City was awarded a new three-year grant in October 2012 in the amount of $2.4 million. The City follows strict EPA/HUD guidelines for testing and abatement of identified lead-based paint hazards and requires compliance from its contractors and subcontractors, all of whom must be trained and certified through various EPA programs. Lead poisoning in children under the age of 6 years has been proven to cause profound learning disabilities, extensive liver damage, and in some cases, even death. Current data also supports the notion that adult victims of lead poisoning possess a 45% greater chance of demonstrating criminal behavior. Funded and administered by HUD's Office of Healthy Homes, the Lead-Based Paint Hazard Control Program (LHCP) conducts an EPA-sanctioned lead risk assessment on eligible residential structures (built prior to 1978 and in which at least one child under the age of six resides) and, upon detection of lead contamination, provides the requisite

lead interim controls and abatement strategies to eliminate all existing hazards, after which a City of Tucson, EPA-certified Lead Supervisor tests and confirms the property as 'lead-safe.' Under LHCP, which will provide $2,480,000 over a three-year period, the community's inventory of lead-safe housing units is increased on a monthly basis. This project completes approximately 80 residential units per year while positively impacting the health of over 1,000 Tucson residents, including more than 700 children.

Rehabilitation projects - The City follows strict EPA/HUD guidelines for testing and abatement of lead-based paint and other hazardous substances, and requires compliance from its contractors and subcontractors. Any structures built before 1978 that are proposed for rehabilitation under Federal Programs are evaluated for lead-based paint hazards; remediation activities are carried out as deemed necessary. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. The City of Tucson has licensed contractors who are available to perform appropriate abatement and/or removal procedures if lead-based paint is present.

In FY 2014, funds will be allocated for the Housing Rehabilitation Collaborative (HRC) Environmental Resources and Compliance Project. Part of the funding will be used to train non-profit and City staff on federal compliance requirements. In addition, seminars dealing with asbestos, mold and healthy-homes awareness will be held. The following agencies comprise the HRC: City of Tucson, Chicanos Por La Causa, DIRECT Center for Independence, Community Home Repair Projects of Arizona (CHRPA), Rebuilding Together Tucson, Tucson Urban League, TMM Family Services and Old Pueblo Community Services.

Housing/Transportation Coordination

Describe the actions to coordinate its housing strategy with local and regional transportation planning strategies to ensure to the extent practicable that residents of affordable housing have access to public transportation.

Creating neighborhoods that offer both housing and transportation affordability requires multiple and targeted strategies and coordination within and across government agencies and the private sector. Strategies must take into account availability of public transportation; location of housing in relation to transportation options, basic services, and jobs; and land use provisions that accommodate mixes of uses. The Center for Neighborhood Technology (CNT) has developed the Housing + Transportation Affordability Index, which includes the cost of transportation with the cost of housing to more accurately determine the affordability of a residential unit by factoring its location in relation to transit, jobs, schools, and other basic services. The tool now includes Pima County data.

The City of Tucson has presented the draft General Plan for public comment. The Plan provides guidance to better integrate housing, public transportation, services, and jobs. Tools such as the CNT Index were considered in the development of the Plan.

Additionally, member jurisdictions within the Tucson Metropolitan Area have been working together to create a regional vision that takes into account the issues of affordable housing and transportation as an important component to smart growth.

Federal, State and Local Resources

In addition to the funds noted in this document, an estimated $54.9 million in federal, state and local resources will help address the needs identified in the plan. They include:

- $40.2 million - Housing Choice Voucher Program
- $11.4 million - Public Housing Program
- $ 900,000 - Lead Hazard Control Program (LHC)
- $ 1.0 million - Neighborhood Stabilization Program (NSP3)
- $ 1.4 million - City of Tucson General Funds for Public Human Services

Managing the Process

1. Identify the lead agency, entity, and agencies responsible for administering programs covered by the consolidated plan.

2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.

3. Describe actions that will take place during the next year to enhance coordination between public and private housing, health, and social service agencies.

Program Year 4 Action Plan Managing the Process response:

The City of Tucson Housing and Community Development Department is responsible for overseeing the development of the Action Plan. For the administration of CDBG, ESG and HOME funds, the City of Tucson Housing and Community Development Department is the lead agency and collaborates with the Tucson Housing Rehabilitation Collaborative, Tucson Pima Collaboration to End Homelessness (TPCH), Pima County, Pima Association of Governments SSBG Committee, Pima Council on Aging, as well many non-profit agencies delivering services in developing needs and priorities for funding and services. The 2010-2015 Consolidated Plan remains the key guiding document for funding and goal setting.

Housing and Community Development staff is involved in committees and sub-committees of local organizations and collaboratives providing services to our identified service populations. Through staff's work on these committees and internal information exchanges, the Department of Housing and Community Development monitors emerging issues and changing needs for programs and services within the community. The City convenes the Human Services Planning Committee bi-annually to determine priorities and selection criteria for Public/Human Services Funding. The City contracts with the Southern Arizona AIDS Foundation (SAAF) to provide housing and case management services with HOPWA funds.

Citizen Participation

1. Provide a summary of the citizen participation process.

2. Provide a summary of citizen comments or views on the plan.

3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.

4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

Program Year 4 Action Plan Citizen Participation response:

As required by the Department of Housing and Urban Development (HUD), the City of Tucson complies with 24 CFR 91.105, Citizen Participation Plan for local governments as outline. The City has adopted a citizen's participation plan that sets forth the City's policies and procedures for citizen participation. A complete copy of this plan may be found on the City's website: http://cms3.tucsonaz.gov/hcd/plans

The City of Tucson's goal for citizen participation is to ensure broad participation of both residents and service providers in housing and community development planning and program development. The City follows its published Citizen Participation Plan in consulting with the public and stakeholder agencies.

The City of Tucson Housing and Community Development Department is responsible for overseeing the development of the Action Plan. The City's Citizen Participation Plan was followed in preparing the Action Plan. The Action Plan was made available to the public for a 30-day review period (April 6 – May 6). A public meeting was held on April 18, 2013, with 3 members of the public in attendance.

A final public hearing was held by the Mayor and Council on May 7, 2013. There were no citizen comments from this hearing. City staff undertook a comprehensive outreach approach for the public meetings, including direct mailings and notices in the local paper. The mailing list was comprised of agencies that have responded to previous Requests for Proposals, and other community stakeholders.

Comments received:

Via email-

From: "Bleyle, Donna, K" <DBleyle@azdes.gov>
To: "HCDcomment@tucsonaz.gov" <HCDcomment@tucsonaz.gov>
Date: 4/11/2013 3:30 PM
Subject: ESG
Small comment. You have listed ESG as the Emergency Shelter Grant. ESG has been changed to the Emergency Solutions Grant. You may want to correct that.

Donna Bleyle
State Homeless Coordinator
Department of Economic Security
1789 West Jefferson Street
P.O. Box 6123, Site Code 086Z
Phoenix, Arizona 85007
Ph: 602-542-9949
Cell: 602-568-2155

Response:

From: HCDComment
To: Donna K Bleyle
CC: elaine raviele; jodie barnes
Date: 4/18/2013 9:23 AM
Subject: Re: ESG
Donna, thank you so much for bringing that to our attention. We will make that correction.

(Note: A review of the Annual Action Plan document did not reveal any instances where ESG was incorrectly identified. There was an instance on the Department's website where ESG was incorrectly referenced. This error was corrected)

Monitoring

1. Describe actions that will take place during the next year to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

Program Year 4 Action Plan Monitoring response:

Program monitoring for CDBG and HOME regulatory compliance occurs on a continual basis.

The following is the City's current guidance relating to monitoring plans for both CDBG and HOME (HOME monitoring schedule is located on page 28). Our strong commitment to the monitoring of our partnering agencies has resulted in stronger relationships, minimization of errors, and better product and service delivery throughout the community. Of particular note is our pre-contract audit requirement, whereby City staff review agencies' financial systems to insure that they have the capacity to successfully manage the awarded funds.

During the contract process, subrecipients are afforded one-on-one technical assistance designed to assist with developing successful programs, and to discuss the regulatory requirements of the CDBG/HOME/ESG/HOPWA programs.

Pre-Award Screening

- Prior to award of funds, all sub-recipient service providers received pre-contract assessments to assure that sufficient administrative and fiscal management systems were in place to successfully provide the service identified in the grant applications.
- During the RFP process, City staff met individually with agencies to evaluate other program capacity issues.

Post-Award Monitoring

- After funding approval, sub-recipients received program orientation and technical assistance in setting up the necessary reporting mechanisms.
- Desk monitoring and technical assistance was provided on a continual basis as monthly billings were reviewed and processed.

City staff conducted Need and Risk Assessments on 100% of the contracts. City staff used the Monitoring HOME Program Performance model developed by HUD to ensure compliance with HOME rules and regulations. Public facility and infrastructure

projects with Davis-Bacon requirements were implemented, administered and monitored in compliance with the appropriate statutes and regulations.

Annually, City staff holds an eligibility-training class for all funded agencies that manage low-income HOME rental units. The class is mandatory for all CHDO's that receive CHDO Operating Funds. The training includes how to conduct income eligibility in accordance with Section 8 guidelines, and explains what documents must be maintained in the eligibility file.

CDBG Monitoring
It is the policy of the Housing and Community Development Department, Planning and Community Development Division, to monitor all sub-recipient contracts on an annual basis. All sub-recipients will, at a minimum, be monitored by means of an office desk-review utilizing a monitoring checklist appropriate for the program/project. Those sub-recipients whose risk assessment is high (4 or more factors checked) will receive on-site monitoring. Those sub-recipients whose risk assessment is medium (2 to 3 factors checked) will, time permitting, receive on-site monitoring, with those with the highest number of risk factors being a priority. Those sub-recipients whose risk assessment is low (0 to1 factors checked) will receive a desk-review monitoring. All sub-recipients will receive on-site monitoring in the event it is requested by an authorized city, state or federal official. Additionally, the City may, at its discretion, perform a risk assessment of a sub-recipient, and if the risk assessment warrants on-site monitoring, the City may perform same. The monitoring checklist will be revised this year based on discussions with HUD staff. All public facility projects require an on-site visit prior to making final payment.

Monitoring Consolidated Plan Performance
The Consolidated Plan is utilized as the basis for compiling the Annual Action Plan to ensure continuity of progress toward meeting the goals of the 5-year plan. The Division conducts weekly management meetings to discuss issues and develop plans to mitigate problems, achieve stated goals, and meet regulations. Project specific meetings are conducted to discuss issues associated with particular projects. The department director and assistant director are informed and/or included in project specific meeting as needed. The Consolidated Annual Performance and Evaluation Report (CAPER), is reviewed to ensure that needs are being met and goals are being accomplished.

Lead-based Paint

1. Describe the actions that will take place during the next year to evaluate and reduce the number of housing units containing lead-based paint hazards in order to increase the inventory of lead-safe housing available to extremely low-income, low-income, and moderate-income families, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

Program Year 4 Action Plan Lead-based Paint response:

The City follows strict EPA/HUD guidelines for testing and abatement of lead-based paint and other hazardous substances. The City requires compliance from its contractors and subcontractors involved in rehabilitation projects. Any structures built before 1978 that are proposed for rehabilitation under Federal Programs are evaluated for lead-based paint hazards; remediation activities are carried out as

deemed necessary. Notices and requirements regarding testing and removal of lead-based paint are provided to program participants, contractors and project sponsors. The City of Tucson has licensed contractors who are available to perform appropriate abatement and/or removal procedures if lead-based paint is present. In FY 2014, funds will be allocated for the Housing Rehabilitation Collaborative's Environmental Resources and Compliance Project. Part of the funding will be used to train non-profit and City staff on federal compliance requirements. In addition, seminars dealing with asbestos, mold and healthy-homes awareness will be held.

HOUSING

Specific Housing Objectives

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve during the next year.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 4 Action Plan Specific Objectives response:

Tucson strives to meet the underserved needs of the community. This is accomplished through programs and services to homeowners, renters, and persons who are experiencing homelessness.

Homeowners
In FY 2014, The Housing Rehabilitation Collaborative will provide assistance to 475 households through its various housing rehab programs.

Renters
Housing Choice Voucher Program - In FY 2014, the City of Tucson will provide 4,230 vouchers for Tucson and an additional 807 for Pima County. These figures include several specialty programs for specific populations and represent a reduction of 6.9% from FY 2013.

Public Housing – The City of Tucson will provide 1,505 public housing units in FY 2014. Applicants must be below 50% AMI to qualify. At least 40% of new admissions must be below 30% AMI.

Needs of Public Housing

1. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake during the next year to encourage public housing residents to become more involved in management and participate in homeownership.

2. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation during the next year.

Program Year 4 Action Plan Public Housing Strategy response:

The City has several initiatives that provide opportunities to Public Housing Program residents:

Family Self -Sufficiency Program

City of Tucson's Self-Sufficiency Program seeks to assist Section 8 and public housing residents move from dependency on public assistance programs to independence. Provision of case management services, educational opportunities, job training opportunities, employment assistance, and the use of an escrow savings account are program components designed to help participants achieve goals.

Homeownership

The Section 8 Home Ownership Program (SEHOP) provides an opportunity for low-income Housing Choice Voucher (HCV) holders to achieve homeownership. HCD has made 25 HCVs available from AZ004 and an additional 15 HCVs from AZ033 for homeownership. Moreover, staff works with homeownership clients to make them aware of the other resources available in the community, e.g. those available through the City's HOME program, Federal Home Loan Bank, sponsors of Individual Development Accounts, and products sponsored by the Industrial Development Authority such as mortgage revenue bonds and mortgage credit certificates.

IDEA Program

The IDEA program provides assistance with down payment and closing costs to qualified participants of the City of Tucson's Family Self-Sufficiency program (FSS). In an effort to promote first-time homeownership for low-income families, eligible FSS families receive homebuyer education/counseling and their escrow savings accounts are matched on a $3-to-$1 basis, up to a maximum award of $15,000. IDEA funding for Tucson is provided by Federal Home Loan Bank of San Francisco, and administered by National Bank of Arizona.

Asset Management Project (AMP) Operations

Tucson manages the federally funded Public Housing Program, which operates according to HUD's AMP approach to property management. The Program includes 11 AMP's managed by six Housing Management Project Coordinators and their administrative and maintenance staff. The AMPs include both multifamily complexes and individual homes, duplexes, and triplexes scattered throughout the city.

ROSS Program

Over several years, Lutheran Social Services of the Southwest (LSS–SW) has received three HUD Resident Opportunities and Self-Sufficiency (ROSS) grants in the amount of $375,000 each, to serve our Public Housing elderly/disabled residents. HCD acts as Contract Administrator, overseeing activity on these grants. Each grant has an initial term of three years. ROSS grants provide services that help residents to maintain physical and mental health, good nutrition, fitness, and socialization. They learn ways to manage chronic disease, navigate the health care system, and find resources in the community. Group transportation to shopping, cultural & community events, parks & outdoor activities, health fairs, and health screenings are also provided through the ROSS

grants. These services enable many residents to continue living independently and to avoid institutionalization.

Section 3 Resident Recruitment

In accordance with the *Section 3 Plan for The City of Tucson Housing Authority and the City of Tucson*, the resident councils, as well as neighborhood associations are provided with information and their assistance is requested in notifying residents of available Section 3 training and employment opportunities. Additionally, training and employment opportunities are advertised in residents' newsletters as well as at all public housing management offices. The Plan can be viewed online: http://cms3.tucsonaz.gov/files/hcd/section3final020711.pdf

Barriers to Affordable Housing

1. Describe the actions that will take place during the next year to remove barriers to affordable housing.

Program Year 4 Action Plan Barriers to Affordable Housing response:

The following are actions the City will take in FY 2014 to remove barriers to affordable housing:

Bilingual Material

A large percentage of low-income residents in Pima County are Spanish speaking. Materials and advertisements promoting countywide homeownership programs are printed in English and Spanish.

The City of Tucson has also established a Language Assistance Plan for those clients with limited English proficiency (LEP Plan). It provides meaningful access to program information and services for clients who are limited in their English proficiency.

Incentives for Private Developers

The City provides incentives to non-profit and for-profit developers that expand their affordable housing production. The City has leveraged land and provided below-market financing for affordable housing development. The City also markets individual homes and provides qualified buyers for affordable houses produced by the private sector.

Don't Borrow Trouble Program

Don't Borrow Trouble is the first comprehensive consumer awareness campaign of its kind, combining public education and counseling services to help homeowners avoid lending practices that strip away their home's equity. Don't Borrow Trouble uses brochures, mailings, posters, public service announcements, transit ads and television commercials to inform the public and answer questions from potential borrowers — and to provide assistance to consumers if they've already taken out a loan.

Fair Housing: Eliminating Barriers to Housing Choice

The City of Tucson/Pima County consortium is a CDBG entitlement jurisdiction with a mandate to affirmatively further fair housing (AFFH). The mandate is carried out in part by conducting the Analysis of Impediments to Fair Housing Choice (AI) process. The AI report is submitted to HUD. The AI contains an action plan with measurable actions to be taken to overcome the effects of the fair housing impediments identified in the report. The consortium has five primary goals in developing the AI and implementing the action plan:

1) Eliminate all forms of illegal housing discrimination.
2) Actively promote fair housing choice for all persons.
3) Provide opportunities for inclusive patterns of housing occupancy regardless of race, color, religion, sex, familial status, disability and national origin.
4) Actively promote housing that is structurally accessible to, and usable by, all persons, particularly persons with disabilities.
5) Foster compliance with the nondiscrimination provisions of the Fair Housing Act.

The initial AI report was submitted in 1998 and was updated in 2004 and 2009. The 2009 AI, covering 2010-2014, updates and revises the last AI completed in 2004, and is available at http://cms3.tucsonaz.gov/hcd/plans. The 2009 AI was drafted by the Southwest Fair Housing Council (SWFHC) under contract to, and with funding from, Pima County. This work was done on behalf of the consortium.

The City of Tucson currently contracts with SWFHC to fund its Fair Housing Program and its Don't Borrow Trouble Program. These programs assist the city to meet its fair housing and fair lending obligations. SWFHC provides comprehensive services to achieve and preserve equal access to housing for all people. SWFHC provides education and outreach to public and private entities, fair housing testing to investigate housing discrimination and assistance to clients with fair housing issues through mediation and filing fair housing complaints.

The Don't Borrow Trouble Program (DBT) protects homeownership, family wealth and people's fair lending rights. DBT seeks to eliminate abusive financial practices, increase awareness about predatory lending, eliminate mortgage scams, prevent foreclosures and remedy lending discrimination. Staff provides education and outreach to public and private agencies, assists clients with fair lending issues and refers clients to partner agencies for further assistance.

Over the next year, the City of Tucson will work to eliminate housing discrimination and affirmatively further fair housing. The City will strive to achieve these goals by continuing to fund and work closely with the Southwest Fair Housing Council. The City will also continue to improve its efforts to affirmatively further fair housing by using the AI as a cornerstone of housing and community development planning. The City will also continue to implement the action plan contained in the AI. As the plan is implemented, the City will monitor the actions taken and maintain records of those actions. The records will be reviewed at the end of the year and used to help formulate next year's fair housing action plan.

FUNDS COMMITTED TO FAIR HOUSING ACTIVITY

AGENCY	CITY FUNDING
Southwest Fair Housing Council	$25,000
Don't Borrow Trouble	$25,000
TOTAL	**$50,000**

HOME/ American Dream Down payment Initiative (ADDI)

Describe other forms of investment not described in § 92.205(b).

If the participating jurisdiction (PJ) will use HOME or ADDI funds for homebuyers, it must state the guidelines for resale or recapture, as required in § 92.254 of the HOME rule.

Affordability of HOME funds shall be maintained by the recapture method, except for those instances where HOME funds are used in conjunction with the Pima County Community Land Trust, in those instances, the affordability will be maintained by the resale method. A Note and Deed of Trust will be recorded to ensure the required period of affordability is met.

The City of Tucson shall recapture all or a portion of the direct HOME subsidy if the HOME recipient decides to sell the house within the affordability period at whatever price the market will bear. If there are no net proceeds or insufficient proceeds to recapture the full amount of HOME investment due, the amount subject to recapture shall be limited to what is available from net proceeds. Net proceeds are defined as the sales price minus superior non-HOME loan repayments and any closing costs.

If the PJ will use HOME funds to refinance existing debt secured by multifamily housing that is that is being rehabilitated with HOME funds, it must state its refinancing guidelines required under § 92.206(b). The guidelines shall describe the conditions under which the PJ will refinance existing debt. At a minimum these guidelines must:
Demonstrate that rehabilitation is the primary eligible activity and ensure that this requirement is met by establishing a minimum level of rehabilitation per unit or a required ratio between rehabilitation and refinancing.
Require a review of management practices to demonstrate that disinvestments in the property has not occurred; that the long-term needs of the project can be met; and that the feasibility of serving the targeted population over an extended affordability period can be demonstrated.
State whether the new investment is being made to maintain current affordable units, create additional affordable units, or both.
Specify the required period of affordability, whether it is the minimum 15 years or longer.
Specify whether the investment of HOME funds may be jurisdiction-wide or limited to a specific geographic area, such as a neighborhood identified in a neighborhood revitalization strategy under 24 CFR 91.215(e)(2) or a Federally designated Empowerment Zone or Enterprise Community.
State that HOME funds cannot be used to refinance multifamily loans made or insured by any federal program, including CDBG.

HOME funds will not be utilized in this manner.

If the PJ is going to receive American Dream Down payment Initiative (ADDI) funds, please complete the following narratives:
Describe the planned use of the ADDI funds.
Describe the PJ's plan for conducting targeted outreach to residents and tenants of public housing and manufactured housing and to other families assisted by public housing agencies, for the purposes of ensuring that the ADDI funds are used to provide down payment assistance for such residents, tenants, and families.
Describe the actions to be taken to ensure the suitability of families receiving ADDI funds to undertake and maintain homeownership, such as provision of housing counseling to homebuyers.

The City will not receive ADDI funds.

Program Year 4 Action Plan HOME/ADDI response:

HOME PROGRAM DESCRIPTION

The Home Investment Partnership program (HOME) was authorized by Congress as part of the 1990 National Affordable Housing Act. HOME is an annual entitlement that provides local governments with funds to acquire, rehabilitate, build or subsidize transitional, rental and homeowner housing for low-income families. HOME program funds require a 25% local match with non-federal funds.

The program allows localities to join together to form a consortium, in which one entity is the lead and the HOME entitlement is calculated based on the needs of the consortium as a whole. The City of Tucson and Pima County formed a HOME consortium in 1992, with the City as the lead agency.

The HOME program also defines special non-profits called Community Housing Development Organizations (CHDOs), which are certified to meet federal criteria, and for which at least 15% of the local HOME allocation must be set aside. While CHDOs may also get HOME funds (up to 5% of the allocation) for operating costs, our Consortium has opted to join most PJ's across the nation in eliminating operating funds. Currently there are nine CHDOs in the consortium service area: Chicanos Por La Causa, Habitat for Humanity, Old Pueblo Community Foundation, Primavera Foundation, TMM Family Services, Compass Affordable Housing, International Sonoran Desert Alliance, La Frontera Partners and Drachman Design Build.

Each year the City and County are required to prepare a HOME program description as part of the annual update to the 5-year Consolidated Plan. This program description describes how HOME funds will be budgeted for the upcoming fiscal year, July 1 through June 30. As part of the Annual Plan, this program description is submitted to HUD for approval.

HUD FY 2014 HOME Allocation

The total HOME funds allocated to the City of Tucson and Pima County for FY 2014 is $2,320,009. These funds are allocated as follows: 10% for Administration, 20% CHDOs (15% projects, 5% operating costs not to exceed 50% of a CHDOs non-federal total operating budget), and 70% for other HOME projects. The following describes the use and project types for the City of Tucson HOME program entitlement funds, followed by the description of use and project types of the Pima County HOME program entitlement funds.

HOME Funds Distribution	Consortium Allocation	Pima County Allocation	City of Tucson Allocation
Total	**$2,320,009**	**$533,602**	**$1,786,407**
Administration	**$232,000**	**$42,502**	**$189,498**
CHDO Projects	**$348,001**	**$69,600**	**$278,401**
Projects	**$1,740,008**	**$421,500**	**$1,318,502**

City Projects	
Rehabilitation (deferred Loan)	**$0.00**
TBRA	**$10,000**
Rental	**$1,058,502**
Homeownership	**$250,000**
Total	**$1,318,502**

County Projects	
Homeownership: down payment assistance, development & preservation	**$150,000**
Rental Development & Preservation	**$271,500**
Total	**$421,500**

Note: Allocations are subject to change as City and County enter into a new Intergovernmental Agreement (IGA).

The City and County will set aside general funds as necessary to meet the 25% HOME match requirement. The City and County will also calculate resources such as: donated land, non-federal sources of cash invested in projects, and the value of savings on below-market interest rate loans.

Community Housing Development Organizations (CHDOs) Budget: $348,001

The City of Tucson, as the lead agency, works directly with CHDOs to develop affordable housing units. CHDOs are non-profit organizations that meet federal HOME criteria to develop, sponsor, and/or own projects. The activities of CHDOs include rental housing, transitional housing and single-family home acquisition, rehabilitation and new construction, and assistance to homebuyers. Funding for this program is the amount equivalent to 15% of the total HOME allocation.

HOME Program Match Requirement

Twenty-five percent (25%) matching funds for HOME funding will be provided from the County and City general funds as well as the value of resources such as donated land, nonfederal source sources of cash invested in projects and the value of savings on below-market interest rate loans to meet the 25% HOME Match requirement.

HOME Monitoring

Annually, the City of Tucson monitors the following units to ensure that all of the HOME units, and the Complexes meet the HOME Monitoring requirements as specified in 24 CFR Part 92.207.

Rental Partnership Monitoring Frequency and Scheduling

	Project	Frequency	# COT HOME Units
1	Casa Bonita 1 & 2	2 years	4
2	MHC - 9 Home Contract	2 years	9
3	MHC - 11 Home Contract	2 years	11
4	El Portal	Annual	43
5	Casita Mia 1 & 2	2 years	10
6	Parkside Terrace Apts	Annual	11
7	Winstel Terrace Apart.	Annual	19
8	Colores Del Sol	Annual	11
9	Casa Bonita 3, 4 & 5	Annual	11
10	St. Lukes in the Desert	Annual	5
11	1 North 5th	Annual	11
12	Talavera Apartments	Annual	11
13	Fry Apartments	Annual	48
14	TMM Fairhaven North	3 years	5
15	Mabel & Delano	2 years	8
16	TMM Lee St - Fourplex	3 years	4
17	TMM Fairhaven South	3 years	4
18	New Beginnings PH 1	2 years	16
19	New Beginnings PH 2	2 years	24
20	Las Villas De Kino Phase 1	Annual	11
21	Las Villas De Kino Phase 2	Annual	11
22	Casitas Esparanzas Byas	2 years	8
23	Wings of Freedom	2 years	8
24	MacArthur Apartments	2 years	6
25	Michael Keith	3 years	1
26	Casita Mia 5	3 years	2
27	ADDI/HAP	Annual	N/A
28	Council House	Annual	4
29	NCR of Tucson	Desk Only	30
30	Ghost Ranch Lodge Ph 1	Annual	20
31	Casitas On Broadway	Desk Only	28
32	Glenstone Apts	Annual	7
33	Ghost Ranch Lodge Ph 2	Annual	11
34	Blanche Johnson	Desk Only	34

Affirmative Marketing

The City of Tucson requires the owner/agent to comply with the City's procedures and requirements for rental projects containing five or more HOME assisted housing units. Affirmative marketing steps consist of actions to provide information and otherwise attract eligible persons in the housing market area (as defined in the original HOME funds application) to the available housing without regard to race, color, national origin, sex, religion, familial status or disability. The affirmative marketing requirements and procedure adopted by the city of Tucson are included in every HOME/agency contract.

The City will assess the affirmative marketing efforts of the owner by comparing predetermined occupancy goals to actual occupancy data that the owner is required to maintain. Outreach efforts on the part of the owner will be evaluated by reviewing marketing efforts.

The City will assess the efforts of the owners receiving HOME funds during the rent-up period and marketing of the units by use of a compliance certification or personal monitoring visit to the project at least annually.

Corrective actions are required when it is determined that the owner has failed to follow affirmative marketing requirements. Such actions include extensive outreach efforts to appropriate contacts to achieve occupancy goals, or other actions the City may deem necessary.

HOME Minority and Women-Owned Business

The City has developed a Disadvantaged Business Enterprise (DBE) Program to ensure full and equitable economic opportunities to persons and businesses that compete for business with the City of Tucson, including minority-owned business enterprises and woman-owned business enterprises.

The following remedies are employed by the City of Tucson to address marketplace discrimination against minority (MBE) and women-owned (WBE) businesses:

- Consultation with new or developing businesses
- Certification of minority and women-owned businesses
- Publication and distribution of a MBE/WBE Directory
- Notification of MBEs and WBEs of Invitation for Bids (IFB) and Requests for Proposals (RFP) relating to construction, procurement and professional services
- Holding of city construction project plans for use by MBEs and WBEs
- Development and execution of seminars
- Conducting outreach activities to recruit MBEs and WBEs into the city purchasing process, including workshops for small businesses and publications describing the city's purchasing process
- Providing assistance with purchasing procedures and policies
- Monitoring of purchasing efforts to ensure MBE/WBE access to the process

The City encourages minority participation in HOPE VI activities through a Section 3 Outreach Program. This program provides employment opportunities to low-income and project-area residents, and is supplemented by a commitment of funds for education and training.

HOMELESS

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 by 2012. 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 4 Action Plan Special Needs response:

Plan for Investment and Use of Available Funds

The Continuum of Care expects to receive approximately $13 million from public and private sources with 100% intended to address the needs of persons who are experiencing homelessness. Of the approximate $8.3 million provided by HUD, 46% is dedicated to the development and ongoing operation of permanent supportive housing for homeless persons with disabilities. The remaining 54% is dedicated to a variety of transitional housing programs for homeless persons that include supportive services and employment services.

During FY 2014, the City plans to spend $818,363 in federal CDBG and ESG funds on programs for persons who are experiencing homelessness. These programs will serve approximately 9 transitional housing and emergency shelters. Specific projects being supported during FY 2014 are listed below. The goals of these projects are to prevent homelessness and assist individuals and families find permanent housing and regain self-sufficiency.

Projects that Serve the Homeless

		CDBG	ESG
Public/Human Services			
CODAC	Project Recovery – rapid rehousing		$45,000
Esperanza En Escalante	Shelter Plus Care Homelessness Prevention		$41,380
Our Family Services, Inc.	New Beginnings Homeless Prevention Program		$69,541
Our Family Services, Inc.	Rapid Rehousing		$85,954
Community Food Bank	Emergency Food Assistance Program	$76,000	
Emerge! Center Against Domestic Violence	Rapid Re-housing for Survivors of Domestic Violence		$137,583
New Beginnings for Women & Children	Emergency Shelter	$67,631	
Old Pueblo Community Services	Street Outreach for Homeless Persons		$32,675
Open INN	Crisis Assistance Shelter/Emergency Assistance	$46,000	$38,902
Primavera Foundation	Emergency Services	$89,056	
Primavera Foundation	Family Shelter Services		$75,353
The Salvation Army	Hospitality House Emergency Shelter		$30,000
Wingspan	Anti Violence Project	$30,000	
Youth on their Own	Special Needs	$30,800	
Pima County	Homeless Mgt. Inf. System (HMIS)		$5,000
		CDBG Total	**ESG Total**
		$339,487	**$561,388**

HOMELESSNESS

The 2010-2015 Consolidated Plan listed the following housing goal to assist persons who are experiencing homelessness and special needs populations:

- Add 200 units of transitional housing and permanent supportive housing (40 units/year)

For Fiscal Year 2014, the City of Tucson plans to use CDBG and ESG money to fund a variety of non-profit agencies for the provision of services to persons experiencing homelessness, those at risk of being homeless and homeless households with children. These activities are summarized below.

- Fund providers through the Continuum of Care process that propose to link housing to services
- Identify homeless characteristics and adapt service system to meet the characteristics
- Increase shelter services, transitional and permanent supportive housing
- Seek additional funding from Shelter Plus Care and Supportive Housing Program Grants
- Seek additional funds for medical, behavioral, substance abuse, and mental health services
- Fund services that enhance discharge planning and other preventive services
- Prevention: rent, utility and mortgage assistance and debt and mortgage counseling

- Short-term assistance: emergency shelters and motel vouchers
- Employment and training tied to housing assistance
- Implementation of Continuum of Care strategies through participation in the local process – Tucson/Pima Collaboration to End Homelessness (TPCH)
- Development of housing targeted to special needs populations
- Continued implementation of a 10-year Plan to End Homelessness and TPCH Strategic Plan

USE OF AVAILABLE RESOURCES

During Fiscal Year 2014 the City will receive the following funds:

Community Development Block Grant (CDBG): $5,439,483

CDBG funds will be used for a variety of housing and community development activities that benefit low- and moderate-income persons. This amount includes residual funds from prior years which have been re-programmed this fiscal year.

HOME Investment Partnerships Program (HOME): $2,320,009

HOME funds, leveraged with local general funds and program income of approximately $550,000 ($220,000 PI, $338,530 GF), will be allocated for new construction, acquisition and down payment assistance projects to preserve and improve the supply of affordable housing.

The City of Tucson and Pima County formed a HOME consortium in 1992, with the City as the lead agency. The City and County will set aside general funds and also calculate resources such as donated land, non-federal sources of cash invested in projects and the value of savings on below-market interest rate loans to meet the 25% HOME Match requirement.

Emergency Solutions Grant program (ESG): $606,906

ESG funds will be applied to projects providing shelter and assistance to the homeless as well as providing funds to prevent homelessness. Funds provide essential services, including operations and maintenance for facilities assisting the homeless and services that prevent homelessness. The ESG program requires a dollar-for-dollar match. This requirement will be met by participating agencies that contract for ESG funding.

Shelter Plus Care: $1,703,498

The Shelter Plus Care Partnership grant ($883,363) provides 100 units of permanent supportive housing for homeless persons and families with disabilities (primarily persons who are seriously mentally ill; have chronic problems with alcohol, drugs, or both; and/or have AIDS or other related diseases). The Shelter Plus Care III ($350,008) grant provides 40 units of permanent supportive housing for homeless individuals and families with disabilities (serious mental illness, physical disabilities, and/or chronic substance abuse problems). The Shelter Plus Care IV grant ($339,222) provides 41 units of housing to homeless veterans who may be seriously mentally ill, physically disabled and/or have chronic substance abuse problems.

Supportive Housing Program (SHP): $947,831

The City will provide 63 units of transitional housing and supportive services for homeless, low-income individuals and families with children. This collaborative effort provides direct links between housing opportunities, supportive services and employment programs for persons who are experiencing homelessness. Targeted populations will include single unaccompanied youth, pregnant and parenting youth, single women or men with children, severely mentally ill persons and chronically homeless individuals with multiple barriers to employment. Although not specifically targeted, the project will serve veterans and victims of domestic violence. A separate Support Services Only project will provide supportive services to victims of domestic violence. In addition, Pathways provides 16 units of permanent supportive housing to homeless and chronically homeless disabled individuals and families.

Housing Opportunities for Persons with AIDS (HOPWA): $422,357

The City will contract with the Southern Arizona AIDS Foundation (SAAF) to provide housing and case management services.

The City of Tucson intends to encourage local non-profit housing and support service agencies to pursue all available public and private funding to achieve the Consolidated Plan goals. It is expected that funding from a combination of federal, state and local sources will be used to pursue the majority of the housing and community development strategies. All available funding eligible for each project will be pursued. The City will also encourage these non-profit entities to work with financial institutions and develop plans for leveraging private and public funds to the maximum extent possible considering the specific project involved.

OBSTACLES TO COMPLETING ACTIONS

The following obstacles hinder the city's ability to meet the needs of persons who are experiencing homelessness:

- Insufficient funding for the subsidies necessary to create additional housing for this population
- Funding is decreasing across many sources for programs serving homeless persons
- The current economic and foreclosure crisis has created a sharp increase in homelessness—particularly among first-time homeless individuals.
- Lack of coordination between social service providers and housing providers
- Length of time it takes the disabled population to obtain benefits such as SSI, SSDI and VA benefits
- Insufficient discharge planning
- Employment opportunities that support living wages
- Lack of affordable child care in support of employment and education
- Crime-free housing policies
- Lack of adequate housing resources
- Loss of prevention and case management funds
- Difficulty in siting projects – neighborhood opposition

Chronic Homelessness

In addition to the current plan and strategies to end homelessness, Tucson/Pima Collaboration to end Homelessness (TPCH) is charged with implementing the goals established in the 10-year plan to End Homelessness.
Objectives and Action Steps for ending Chronic Homelessness:

- Target new Shelter+Care and SHP applications to chronically homeless individuals
- Continue to provide rehabilitation job training and development for chronically homeless individuals
- Increase effectiveness of outreach efforts targeting chronically homeless individuals
- Continue to give priority to Continuum of Care applications that propose to provide housing and services to chronically homeless individuals
- Expand continuing education of case managers and social workers regarding the needs of the chronically homeless persons
- Implement Housing-First models and evaluate their effectiveness

TPCH and the Continuum have joined the National 100,000 Homes Campaign and have pledged to provide 51 homes for the most vulnerable chronically homeless persons in the Tucson Community. Using Common Ground's Vulnerability Index tool, over 100 volunteers interviewed community members who are currently living in the desert or on the streets of Tucson. Interviews were conducted in April of 2011. Once the most vulnerable were identified, 51 Homes navigators aggressively worked to coordinate with housing specialists and health and human service agencies to quickly and safely move each person into a home and provide intensive wrap-around support for long-term care. The City of Tucson, the Veterans Administration and the Community Partnership of Southern Arizona as well as private providers of assisted housing have come together to provide funding for the required permanent housing units. To date, 40 (80%) of clients have been provided with permanent housing.

The City of Tucson also participated in the 100 Days Challenge, a national effort to quickly house homeless veterans. It housed 50 vets and 20 additional family members. Staff assists in housing veterans through programs for veterans by the Red Cross, Primavera and Veterans Affairs Supportive Housing (VASH). Eighteen veterans were housed this year through these programs. The Department received major donations of furniture and supplies including approximately 2 dormitory buildings of furniture from Davis Monthan Air Force Base, Best Western Inn & Suites, and the Airport Doubletree Hotel. All of these items are picked up, sorted, and stored in the City's Parks and Recreation warehouse until they are distributed to clients. All clients housed receive furniture, kitchen items, linens, personal care items, cleaning supplies, and food items.

Homelessness Prevention

Prevention services include programs aimed at maintaining people in their homes, i.e. rent and mortgage assistance, utility payment assistance to prevent eviction, case management, housing counseling, landlord/tenant mediation/legal services, behavioral health services, referral services, income maintenance programs and SNAPS (food stamps), job training and placement, and guardianship/representative payee. In addition, prevention programs include supportive education about an

owner's/landlord's specific requirements, and information on tenants' rights and obligations under Arizona law.

Discharge Coordination Policy

The Discharge Planning Committee of Tucson/Pima Collaboration to end Homelessness developed discharge plans with all hospitals in Tucson/Pima County to address discharge procedures for homeless patients. In addition, it provided all hospital discharge planning staff with information about accessibility to all homeless shelters, entry requirements, contact names of shelter staff, and addresses.

Prisoner Re-entry programs- While the PREP program funded by the Department of Labor Employment and Training Administration has ended, Primavera Foundation and Old Pueblo Community Services continue to offer re-entry assistance for those recently released from Department of Corrections facilities. These programs provide services to men and women reentering the community from incarceration. An array of enhanced and graduated supportive services is offered including individualized case management and transitional living facilities.

COMMUNITY DEVELOPMENT

Community Development

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), public facilities, public improvements, public services and economic development.

2. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

Program Year 4 Action Plan Community Development response:

Non-housing community development needs are those related to the needs of people and the needs of the built environment that supports people. The City of Tucson's non-housing community development strategy includes funding for the diverse human services and built environment needs of the City of Tucson.

Public/Human Services

The City of Tucson invests the maximum possible resources (15% of CDBG funding) in human services activities. These funds, combined with ESG and General Fund monies, support effective human service programs that provide rental assistance, emergency and transitional housing, permanent supportive housing for special populations, and direct services such as basic education and assistance with daily living needs. Programs promote prevention and self-sufficiency for clients. Through its funding of Human Services agencies and programs, the City of Tucson's goal is to provide public services assistance to 37,000 individuals during the period covered by this action plan.

Built Environment

For several decades, the focus has been of necessity on supporting growth. The current economic recession represents an opportunity to reinvest in the built environment, focusing on revitalizing existing neighborhoods and communities and enhancing the infrastructure necessary to support existing residents. The built environment is stabilized through code enforcement and demolition activities, historic preservation, rehabilitation of existing structures, and improvement of community infrastructure. Non-housing community development projects and programs identified for funding during this action plan year are focused on these areas and include the following:

City of Tucson Vacant & Neglected Structures (VANS) Program

The City of Tucson has identified the worst and most dangerous vacant buildings in Tucson through its Vacant and Neglected Structures (VANS) program. These vacant and abandoned structures contribute to blight and the destabilization of neighborhoods. They may threaten the health and safety of area residents. Funds from the VANS program will be utilized to stabilize (when possible) or demolish these unsafe structures. Historic structures identified through VANS will be stabilized when possible.

Public Facilities

CDBG funding will be utilized to enhance neighborhood recreation areas such as parks and walking paths which help in promoting healthy lifestyles and active living. Funding will make available safe, attractive, accessible places that help create a sense of place in the neighborhood. Seating nodes in walkable areas will be provided according to needs identified by community residents. Pedestrian safety issues may also be addressed. Funds will be available to address accessibility issues in public facilities utilized by low and moderate income individuals.

Green and Healthy Facilities

The City of Tucson, along with Pima County, has committed funds to assist Emergency Shelter and Transitional Housing agencies address issues within their facilities based on the Green/Health assessment commissioned by Pima County Neighborhood Investment Partnership (PNIP). The funding will assist agencies to upgrade transitional and emergency shelters that need significant improvements based upon the assessment. The City and County will work together to develop criteria for funding. A separate RFP will be conducted to select recipients of these funds.

Economic Development - Section 108

The City of Tucson's request for loan guarantee assistance under Section 108 of the Housing and Community Development Act of 1974, as amended, was approved by the Department of Housing and Urban Development (HUD) on March 7, 2012. $20 million in guaranteed loan funds will be used to create a loan pool available for individual projects in a target range of between $2 million and $10 million that will have positive economic and community development benefits, including job creation.

Antipoverty Strategy

1. Describe the actions that will take place during the next year to reduce the number of poverty level families.

Program Year 4 Action Plan Antipoverty Strategy response:

Most activities undertaken with CDBG, HOME, ESG and HOPWA funds are efforts to reduce the number of persons living in poverty and improve the quality of life for city residents. The City will continue to support emergency assistance programs, and a variety of other support services that are used by low-income households to obtain basic necessities. The main goal is to prevent very low-income persons, especially those earning 30% or less of median income, from becoming homeless. The long-term goal is to provide more affordable housing options so that this group is not forced to spend all their available funds for housing, with little left over for other needs.

As outlined in the Annual Plan, the City has specific strategies that are directly linked to the reduction of poverty. These strategies, which are illustrated throughout this document, are:

- Employment Opportunities
- Self-Sufficiency Assistance
- Support Services
- Affordable Housing

NON-HOMELESS SPECIAL NEEDS HOUSING

Non-homeless Special Needs (91.220 (c) and (e))

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve for the period covered by the Action Plan.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by this Action Plan.

Program Year 4 Action Plan Specific Objectives response:

Special Needs populations fall into seven broad categories: elderly, frail elderly, physically and developmentally disabled, seriously mentally ill, chronic substance and alcohol abusers, persons living with HIV/AIDS and their families, victims of domestic violence, and public housing residents. Over fifteen percent (15.5%) of Pima

County's population is age 65 or older. Almost half are frail elderly (over the age of 75). Housing cost burden is a significant problem for both elderly owners and renters. Thirteen percent (172,778) of the population in Pima County is disabled. Among disabled households, more than half are low or moderate income. In Fiscal Year 2011 there were 32,402 adults and 15,409 children in the public mental health system in Pima County. Among adults, 11,647 or 29% of those enrolled in the public mental health system are Seriously Mentally Ill as defined by a qualifying diagnosis and disability *(CPSA 2011 Annual Report)*. A total of 16,739 individuals in Pima County were enrolled in Arizona's public behavioral health system for substance abuse treatment during 2012 *(ADHS Annual Report on Substance Abuse Treatment Programs, 2012)*.

Programs available in the community to assist this population include: home repair, retrofitting for handicapped accessibility, reverse mortgage counseling and loans, transportation assistance, and housing for persons living with serious mental illness and HIV/AIDS. Goals for serving the non-homeless special needs population for this action plan year include the following:

Housing
The City of Tucson in partnership with the Housing Rehabilitation Collaborative to provide the following rehabilitation and accessibility improvements:

- Retrofit 30 existing housing units to improve accessibility
- Rehab 40 existing housing units for elderly homeowners
- Add 20 permanent, supportive housing units to the existing stock

Public/Human Services
Through CDBG, ESG and General Fund allocations, the City of Tucson supports effective human service programs that provide rental assistance, emergency and transitional housing, permanent supportive housing for special populations, community infrastructure to support services, and direct services such as basic education and assistance with daily living needs. Human service goals for the non-homeless special needs population for this action plan year are to support human services for:

- 5,000 elderly and frail elderly
- 2,500 disabled
- 800 domestic violence victims
- 100 people living with HIV/AIDS

Housing Opportunities for People with AIDS

1. Provide a Brief description of the organization, the area of service, the name of the program contacts, and a broad overview of the range/ type of housing activities to be done during the next year.

2. Report on the actions taken during the year that addressed the special needs of persons who are not homeless but require supportive housing, and assistance for persons who are homeless.

3. Evaluate the progress in meeting its specific objective of providing affordable housing, including a comparison of actual outputs and outcomes to proposed

goals and progress made on the other planned actions indicated in the strategic and action plans. The evaluation can address any related program adjustments or future plans.

4. Report on annual HOPWA output goals for the number of households assisted during the year in: (1) short-term rent, mortgage and utility payments to avoid homelessness; (2) rental assistance programs; and (3) in housing facilities, such as community residences and SRO dwellings, where funds are used to develop and/or operate these facilities. Include any assessment of client outcomes for achieving housing stability, reduced risks of homelessness and improved access to care.

5. Report on the use of committed leveraging from other public and private resources that helped to address needs identified in the plan.

6. Provide an analysis of the extent to which HOPWA funds were distributed among different categories of housing needs consistent with the geographic distribution plans identified in its approved Consolidated Plan.

7. Describe any barriers (including non-regulatory) encountered, actions in response to barriers, and recommendations for program improvement.

8. Please describe the expected trends facing the community in meeting the needs of persons living with HIV/AIDS and provide additional information regarding the administration of services to people with HIV/AIDS.

9. Please note any evaluations, studies or other assessments that will be conducted on the local HOPWA program during the next year.

Program Year 4 Action Plan HOPWA response:

Housing Opportunities for People with AIDS (HOPWA) funds:

Specific HOPWA Objectives

Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

A total of $422,357 is available for programs that provide housing opportunities to people with AIDS. The City will contract with Southern Arizona AIDS Foundation (SAAF) for $409,686 (includes $43,996 for City of Tucson Section 8 /TBRA) to provide the following services to people living with HIV/AIDS:

Housing Subsidy Assistance, including:

- Short-term rent, mortgage and utility assistance
- Short-term facility assistance for emergency shelter vouchers
- Rental assistance for tenant-based permanent housing units
- Permanent Housing Placement assistance

Supportive services including case management and transportation assistance

PROGRAM YEAR 4 ACTION PLAN HOPWA RESPONSE:

Housing Opportunities for People with AIDS (HOPWA) funds:

Specific HOPWA Objectives
Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the Action Plan.

A total of $422,357 is available for programs that provide housing opportunities to people with HIV/AIDS. The City will contract with Southern Arizona AIDS Foundation (SAAF) for $409,686 (includes $43,996 for City of Tucson Section 8 /TBRA) to provide the following services to people living with HIV/AIDS:

• Housing Subsidy Assistance, including:
Short-term rent, mortgage and utility assistance
Short-term facility assistance for emergency shelter vouchers
Rental assistance for tenant-based permanent housing units
Permanent Housing Placement assistance
• Supportive services including case management and transportation assistance

Program Year 4 Action Plan HOPWA response:

The project sponsor is the Southern Arizona AIDS Foundation (SAAF). SAAF is the result of a 1997 merger of the three primary AIDS service organizations in Tucson. The mission of the Southern Arizona AIDS Foundation is to create and sustain a healthier community through a compassionate, comprehensive response to HIV/AIDS. SAAF is a community-based organization in Southern Arizona providing case management, housing, and support services for people living with HIV/AIDS and their families; comprehensive prevention and education programs to reduce the rate of infection; and trainings and opportunities for community members to fill critical roles. SAAF is a member of the Pima County HIV/AIDS Consortium and the Tucson Pima Collaboration to end Homelessness, the Continuum of Care for Tucson and Pima County.

The area of service is the City of Tucson, Arizona, and also includes areas outside the city limits within Pima County, Arizona that are part of the Public Housing Authority. The current prevalence of HIV and AIDS as reported by the Arizona Department of Health Services for Pima County is 2,394 cases (244.22 people per 100,000), with 54.4% of those reporting an AIDS diagnosis. Of the people receiving services through SAAF last year, 96% were low income, with 59% living below 30% of the AMI. Maintaining suitable housing is an ever-present need for SAAF clients who are typically low income. In addition to the struggle to obtain and maintain housing where affordable housing is at a premium, many clients face challenges of poor health, joblessness, mental illness, and/or chronic substance abuse. Maintaining housing has been shown to be a key to treatment plan adherence and remaining in care.

BARRIERS OR TRENDS OVERVIEW

The City of Tucson and the Southern Arizona AIDS Foundation (SAAF) affirms the strong evidence base reported by the National AIDS Housing Coalition for housing as a key component of HIV treatment, care and prevention. Participants in SAAF's housing programs demonstrate access to medical care and supportive services and improved adherence to medical care. There is a reciprocal role between housing and healthcare outcomes—stable housing helps eligible applicants fulfill resident eligibility for Ryan White Program services and the Arizona Health Care Cost Containment System (AHCCCS), the State's Medicaid program, and improved health outcomes help residents meet their goals for maintaining stable housing.

The ability for low income people living with HIV/AIDS to access necessary supportive services in order to maintain stable housing and improve health outcomes has been curtailed due to reductions in public sources that provide the services. The Arizona Department of Economic Security eliminated or reduced a number of safety-net benefit programs, including General Assistance for people with disabilities a number of years ago. The Arizona Department of Health Services has eliminated all State funded mental health services and non-emergency medical transportation due to the ongoing severe budget deficit in the State of Arizona. During the past year eligibility requirements for AHCCCS changed, eliminating new enrollments of adults in Medicaid who do not have children in the home.

In recognition of the need to build additional capacity to work with clients in accessing employment and training resources, SAAF and the City of Tucson Housing and Community Development Department completed a year-long capacity building and technical assistance project through the HOPWA Getting to Work Initiative. SAAF is moving forward with the employment objectives and activities identified when the project ended.

ASSESSMENT OF UNMET HOUSING NEEDS

Sponsor organization Southern Arizona AIDS Foundation (SAAF) served 1,117 people living with HIV/AIDS in FY 2011-2012. SAAF estimates that there is a current unmet housing need for 200 HOPWA eligible households. Of those, 80 have an unmet need for tenant-based rental assistance, 60 for housing facilities such as community residences and other housing facilities, and 60 households have an unmet need for short-term rent, mortgage and utility assistance delineated as follows:

- Forty-three households have an unmet need for assistance with rental costs,
- Four households have an unmet need for assistance with mortgage payments, and
- Thirteen households have an unmet need for utility assistance.

People living with HIV/AIDS in Tucson and Pima County need housing resources that are flexible. Supportive services that help people maintain stable housing, whether through comprehensive HIV/AIDS service providers or community mainstream resources, are needed to equip and support people navigating a complicated and fragmented service system, while recognizing the challenge of dealing with co-occurring health and mental health issues present in many people living with HIV/AIDS. In Pima County people living with HIV/AIDS includes other special needs populations, and the ability to coordinate with other service systems is critical in order to maintain stable housing and support access to care.

HOPWA OUTPUT GOALS
Annual Performance under the Action Plan for Year 4

The range/type of housing activities for 2013-2014 includes:

1) Housing Subsidy Assistance
a. Rental Assistance for tenant-based permanent housing units
8 households annually
b. Transitional/Short-term Facilities assistance
18 households annually
c. Short-term rent, mortgage and utility assistance
110 households annually
d. Permanent housing placement services including move-in deposits and housing prescreen assistance
115 households annually

2) Case management and supportive services including transportation assistance, vital records to facilitate access to benefits, and limited substance abuse related services
425 people annually

These activities complement the Permanent Supportive Housing activities which are the focus of the HOPWA Competitive funding administered through Pima County, Arizona, benefiting additional people living with HIV/AIDS in Pima County.

OUTCOMES TO BE REPORTED IN YEAR 4 INCLUDE:

A. Housing Stability: Assessment of Client Outcomes on Maintaining Housing Stability (Permanent Housing and Related Facilities)

B. Prevention of Homelessness: Assessment of Client Outcomes on Reduced Risks of Homelessness (Short-Term Housing Assistance)

C. Access to Care and Support
- Has a housing plan for maintaining or establishing stable on-going housing.
- Has contact with case manager/benefits counselor consistent with the schedule specified in client's individual service plan.
- Had contact with a primary health care provider consistent with the schedule specified in client's individual service plan.
- Has accessed and can maintain medical insurance/assistance.
- Successfully accessed or maintained qualification for sources of income.
- Total number of households that obtained or maintained an income-producing job.

Other Narrative

Include any Action Plan information that was not covered by a narrative in any other section.

Project Listing

	AGENCY NAME	PROJECT NAME		
	PUBLIC SERVICES/HUMAN SERVICES		**SERVICE AREA**	**CDBG AMOUNT**
1	Community Food Bank of Southern Arizona	The Emergency Food Assistance Program	Crisis Assistance	$152,000
2	New Beginnings for Women and Children	Emergency Shelter	Crisis Assistance	$67,631
3	Open Inn, Inc.	Emergency Assistance and Shelter Program	Crisis Assistance	$46,000
4	Southern Arizona Children's Advocacy Center	Investigative/Intervention Services for Child Abuse Victims	Crisis Assistance	$63,360
5	Wingspan	Anti-Violence Program	Crisis Assistance	$30,000
6	Arizona Children Association dba Southern Arizona Center Against Sexual Assault	Sexual Assault Crisis Services	Crisis Assistance	$53,605
7	Tucson Centers for Women and Children dba Emerge! Center Against Domestic Abuse	Crisis Assistance for Survivors of Domestic Violence	Crisis Assistance	$175,720
8	The Primavera Foundation, Inc.	Emergency Services (Relief and Referral (RR) Men's Shelter	Crisis Assistance	$89,056
9	Youth on Their Own	Special Needs Program	Crisis Assistance	$30,800
10	PCOA/CHRPA	Elderly Independence	Crisis Assistance	$30,500
11	Public Housing City of Tucson	Family Self Sufficiency Program	Crisis Assistance	$18,000
12	United Way	Earned Income Tax Credit	Crisis Assistance	$9,000
			Subtotal	**$765,672**

	PUBLIC SERVICES/HUMAN SERVICES			HOPWA AMOUNT
1	Southern Arizona AIDS Foundation	HOPWA funds		$409,686
1	City of Tucson	HOPWA funds (Admin)		$12,671
			Subtotal	**$422,357**

	AGENCY NAME	PROJECT NAME		
	HOUSING REHAB COLLABORATIVE			CDBG AMOUNT
13	COT/HCD/PCSD	City Neigh & Initiatives		$417,000
14	COT/HCD/PCSD	Emergency Home Repair		$500,000
15	COT/HCD/PCSD	HRC Environmental Compliance		$180,000
16	COT/HCD/PCSD	Lead Based Paint Hazard Program Match		$83,000
17	PCOA	Elderly Home Repair Program		$87,777
18	CPLC	Roof Replacement		$129,989
19	DIRECT	Home Access Program		$137,189
20	CHRPA	City Minor Emergency Repair		$171,389
21	Rebuilding Together Tucson	Neighborhood Renovation		$131,789
22	Tucson Urban League	Emergency Home Repair		$195,689
23	Tucson Urban League	Housing Rehab South Park		$70,200
24	TMM	Midtown Homeowner Program		$107,489
25	Old Pueblo Community Found.	Housing Rehab		$102,989
			Sub-Total	**$2,314,500**

	NEIGHBORHOOD ENHANCEMENT / COMMUNITY DEVELOPMENT			CDBG AMOUNT
26	City of Tucson/HCD	VANS / Historic Stabilization		$300,000
27	City of Tucson / OEO/FD&M	ADA Accessibility Projects		$100,000
28	City of Tucson / Parks & Recreation	Target Area Development-Public Facilities		$713,414
29	Habitat for Humanity	Target Area: Preserve-A-Home Program		$75,000
30	City of Tucson	Green & Healthy Facilities		$150,000
			Subtotal	**$1,338,414**

	AGENCY NAME	PROJECT NAME		
	ADMINISTRATION & PLANNING			**ADMIN FUNDS**
31	City of Tucson/ HCD	Administration		$945,897
	PLANNING			
32	Tucson/Pima Collaboration to end Homelessness	Planning for the Continuum of Care		$25,000
	PLANNING - FAIR HOUSING ACTIVITIES			
33	Southwest Fair Housing Council	Fair Housing Activities		$25,000
34	Southwest Fair Housing Council	Don't Borrow Trouble		$25,000
			Subtotal	**$1,020,897**
			Total CDBG	**$5,439,483**

	AGENCY NAME	PROJECT NAME		
	EMERGENCY SOLUTIONS GRANT (ESG)			**ESG AMOUNT**
35	CODAC	Project Recovery		$45,000
36	Emerge! Center Against Domestic Abuse	Rapid Rehousing for Survivors of Domestic Abuse		$137,583
37	Esperanza En Escalante	Shelter Plus Care Homelessness Prevention		$41,380
38	Our Family Services, Inc.	New Beginnings Homeless Prevention Program		$69,541
39	Old Pueblo Community Services	Street Outreach for Homeless		$32,675
40	Open Inn	Emergency Assistance and Shelter		$38,902
41	Our Family Services, Inc.	Rapid Rehousing		$85,954
42	Primavera Foundation	Emergency Family Shelter		$75,353
43	The Salvation Army	Hospitality House Emergency Shelter		$30,000
44	Pima County	Homeless Management Information System		$5,000
45	City of Tucson	Administration		$45,518
			Total ESG	**$606,906**

Additional Human Services Funding

The City of Tucson is committed to supporting low and moderate income families in the community. In addition to the above funding listed in this Annual Plan, the City of Tucson will provide $1,464,910* in General Funds to assist low and moderate income individuals and families. An RFP process held in the spring allocated the following amounts to community organizations for human service projects:

City of Tucson General Fund Human Service Projects:

	AGENCY NAME	PROJECT NAME		
	HUMAN SERVICES FUNDED BY CITY OF TUCSON GENERAL FUNDS		SERVICE AREA	GENERAL FUND AMOUNT
	Pima Council on Aging	Nutrition Program for the Elderly	Support Services	$30,000
	Our Family Services, Inc.	Teens in Transition Case Management and Counseling	Support Services	$30,000
	Open Inn, Inc.	Transitional Apartment Living	Support Services	$30,000
	Catholic Social Services dba Community Outreach Program for the Deaf	Resources and Supports for Persons Deaf, Hard of Hearing or Deaf Blind	Support Services	$30,000
	Southern Arizona AIDS Foundation (SAAF)	Case Management Services for People Living with HIV/AIDS	Support Services	$30,000
	The Primavera Foundation, Inc.	Women's Services Program	Support Services	$45,964
	Arizona's Children Association dba Las Familias	Sexual Abuse Counseling Services Project	Support Services	$30,000
	Pima Council on Aging	Home Repair for the Elderly	Support Services	$30,000
	Mobile Meals of Tucson, Inc.	Mobile Meals	Support Services	$30,000
	Emerge! Center Against Domestic Abuse	Case Management/Counseling for Survivors of Domestic Abuse	Support Services	$30,000
	Pima Council on Aging	Family Caregiver Support Program	Support Services	$30,000
	Pima Council on Aging	Home Care Support for the Elderly	Support Services	$30,000
	Interfaith Community Services	Case Management with Emergency Financial Assistance	Support Services	$30,000
	Our Family Services, Inc.	Senior Companion Program	Support Services	$30,000
	Tucson Urban League, Inc.	Seniors' Program	Support Services	$30,000
	American Red Cross Southern Arizona Chapter	Service to Armed Forces and Veterans: Case Management	Support Services	$30,000

	AGENCY NAME	PROJECT NAME		
	HUMAN SERVICES FUNDED BY CITY OF TUCSON GENERAL FUNDS		SERVICE AREA	GENERAL FUND AMOUNT
	Southern Arizona Legal Aid, Inc.	Homeowner and Tenant Protection Program	Support Services	$30,000
	Interfaith Community Services	Safe and Healthy Senior/Disabled Independence Program	Support Services	$30,000
	Tu Nidito Children and Family Services	Children to Children	Support Services	$30,000
	Our Family Services, Inc.	Teens in Transition Parenting and Life Education	Youth Services	$42,712
	The YMCA of Southern Arizona	Child Care Means Success for Kids and Families	Youth Services	$60,000
	Casa de los Ninos	Parenting Education Program	Youth Services	$30,000
	Parent Aid Child Abuse Prevention Center	Parent Partners In-Home Parent Support	Youth Services	$30,000
	Catholic Community Services dba Pio Decimo Center	Youth/Childcare/Early Childhood Development	Youth Services	$35,000
	Pima Prevention Partnership	Pima County Teen Court's Parent Support Services Project	Youth Services	$30,000
	Child and Family Resources, Inc.	Happy Hours After School Program & Summer Camp	Youth Services	$30,000
	Arts for All, Inc.	Supporting Low Income Families with Child Care	Youth Services	$31,761
	Tucson Centers for Women and Children dba Emerge! Center Against Domestic Abuse	Angel Children's Center	Youth Services	$30,000
	Tucson Urban League, Inc.	Project YES: Tutoring and Mentoring Program	Youth Services	$30,000
	Tucson Nursery School & Child Care Centers, Inc.	Tucson Nursery School	Youth Services	$30,000
	The Parent Connection, a division of Arizona's Children Association	Parenting Education, Information and Support	Youth Services	$30,000
	CODAC Behavioral Health Services of Pima County, Inc.	Strengthening Families Program: Parents with Youth Ages 10 to 14	Youth Services	$30,000
	Caregiver Training Institute	Developing People to Provide Quality Care	Education & Training	$71,000
	Goodwill Industries	Ready-to-Earn	Education & Training	$60,000
	PCC Adult Ed	GED Now! Career Readiness	Education & Training	$60,000

	AGENCY NAME	PROJECT NAME		
	HUMAN SERVICES FUNDED BY CITY OF TUCSON GENERAL FUNDS		**SERVICE AREA**	**GENERAL FUND AMOUNT**
	Youth on Their Own	Stipend Program	Education & Training	$56,750
	The Primavera Foundation	Primavera Works	Education & Training	$55,000
	Tucson Urban League	Employment and Training	Education & Training	$38,250
	YWCA	Yworks Employment Education	Education & Training	$30,000
	Wingspan	A Step Up	Education & Training	$30,000
	Catholic Social Services/COPD	Building Skills, Developing Employment	Education & Training	$38,473
			Total	**$1,464,910***

** pending final budget adoption*

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POLICY MANUAL

EMERGENCY SOLUTIONS GRANTS (ESG) PROGRAM

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I. INTRODUCTION

BACKGROUND AND PROGRAM DESCRIPTION

A. Description of Emergency Solutions Grants (ESG) Program

On May 20, 2009, President Obama signed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. Beginning FY 2011 the U.S. Government has allocated $250 million in funds to eligible recipients to (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families and individuals from becoming homeless. Pima County and the City of Tucson may provide ESG funds to projects operated by units of general purpose local government or private nonprofit organizations. The Continuum of Care within these jurisdictions must be consulted when determining how to allocate the ESG funds.

All funded agencies are required to follow federal guidelines in the implementation of ESG funding. The City of Tucson and Pima County have written the following policies and procedures to facilitate the agencies in implementing the ESG guidelines as set by the U.S. Department of Housing and Urban Development. Agencies will provide assistance related to housing of persons at risk of becoming homeless and housing persons that are currently homeless, as well as provide housing relocation and stabilization services.

B. ESG Program Awards to City of Tucson and Pima County

The City of Tucson's Department of Housing and Community Development and Pima County's Department of Community Development and Neighborhood Conservation have both received an ESG formula grant. The City of Tucson and Pima County have decided to collaborate in the development of the policies and procedures regarding the disbursement of funds and data collection to promote consistent standards and avoid duplicate and unnecessary assistance. There are differences between the jurisdictional requirements and procedures due to jurisdictional target area differences. Pima County is focused on unincorporated areas whereas the City of Tucson is focused on the population within city limits.

C. Community Input for Program Development

The participation of homeless or formerly homeless individuals will assist in the allocation process and provide input to the evaluation of performance measures where at all possible.

D. Process for Sub-Awards

The Continuum of Care is informed of the ESG process to allocate funds several months prior to the Rating and Ranking process occurring. The City of Tucson and Pima County jointly make the funding allocations. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum. Where at all possible, a homeless or formerly homeless person is asked to participate. The committee ranks the proposals individually and then reviews them as a committee and makes the final funding recommendations.

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A HUD Technical Assistance provider is assisting the Continuum to determine a process where performance standards will be set, as well as a process to evaluate outcomes.

E. Location of Policy Manual

The Policy Manual will be available as electronic documents located on both the Pima County and the City of Tucson website. A hard copy will also be available for review at the City of Tucson's Department of Housing and Community Development and Pima County's Department of Community Development and Neighborhood Conservation.

F. Revisions and Updates

The Policy Manual is a living document. As policies or procedures are modified, these revisions will be updated in the Policy Manual. The most recent version of Policy Manual will be posted online and able for viewing at the respective locations mentioned above.

II. ESG Program General Overview

The ESG program funds are intended to target two populations of persons facing housing instability: (1) individuals and families who are experiencing homelessness (residing in emergency or transitional shelters or on the street) and need temporary assistance in order to obtain housing and retain it, and (2) individuals and families who are currently in housing but are at risk of becoming homeless and need temporary rent and utility assistance to prevent them from becoming homeless or assistance to move to another unit.

A. ELIGIBLE PROGRAM COMPONENTS

a. Street outreach: Essential services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, and transportation. Street outreach includes services that are unable to be provided to individuals or families due to their unwillingness to come to a shelter.

b. Emergency Shelter: Essential services such as case management, childcare, 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.

   Shelter operations include maintenance, rent, repair, security, fuel, equipment, insurance, utilities, relocation, and furnishings. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

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

i. Annual income of the individual or family is below 30 percent of median family income
ii. 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 utilities, 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, and credit repair.

d. 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. Eligible costs also include utilities, rent 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, and credit repair.

e. Data Collection (HMIS): Grant funds may be used for the costs of participating in an existing HMIS of the Continuum of Care where the project is located.

f. Emergency Solutions Grant Administration: Up to 7.5 percent of a recipient's allocation can be used for general management, oversight, coordination, and reporting on the program.

B. HOMELESS DEFINITION

a. Category 1: Literally Homeless
   i. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
      1. Has a primary nighttime residence that is a public or private place not meant for human habitation;
      2. Is living in a publicly or privately operated shelter designed to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
      3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
b. Category 2: Imminent Risk of Homelessness
   i. Individual or family who will imminently lose their primary nighttime residence, provided that:
      1. Residence will be lost within 14 days of the date of application for homeless assistance
      2. No subsequent residence has been identified; and

3. the individual or family lacks the resources or support networks needed to obtain other permanent housing

c. Category 3: Homeless under other Federal Statutes
   i. Unaccompanied youth under 25 years of age, or families with children or youth, who do not otherwise qualify as homeless under this definition, but who:
      1. Are defined as homeless under the other listed federal statutes;
      2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application
      3. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
      4. Can be expected to continue in such status for an extended period of time due to special needs or barriers

d. Category 4: Fleeing/ Attempting to Flee DV
   i. Any individual or family who:
      1. Is fleeing, or is attempting to flee, domestic violence;
      2. Has no other residence; and
      3. Lacks the resources or support networks to obtain other permanent housing.

C. ELIGIBILITY BY COMPONENT: HOMELESS

a. Street Outreach: Individuals defined as homeless under the following categories are eligible for assistance in Street Outreach:
   i. Category 1 = Literally Homeless
   ii. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
      1. Additional limitation on eligibility: Individuals and families must be living on the streets (or other places not meant for human habitation) and be unwilling or unable to access services in emergency shelter.

b. Emergency Shelter: Individuals and families defined as Homeless under the following categories are eligible for assistance in Emergency Shelter projects:
   i. Category 1 = Literally Homeless
   ii. Category 2 = Imminent Risk of Homeless
   iii. Category 3 = Homeless Under Other Federal Statues
   iv. Category 4 = Fleeing/ Attempting to Flee DV

c. Rapid Re-housing: Individuals defined as Homeless under the following categories are eligible for assistance in Rapid Re-Housing projects:
   i. Category 1 = Literally Homeless
   ii. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1

d. Homelessness Prevention: Individuals and Families defined as Homeless under the following categories are eligible for assistance in Homeless Prevention projects:
   i. Category 2 = Imminent risk of Homeless
   ii. Category 3 = Homeless Under Other Federal Statutes
   iii. Category 4 = Fleeing/ Attempting to Flee DV

1. Individuals and Families who are defined as Homeless under the following categories are eligible for assistance in Homelessness Prevention projects
2. Homelessness Prevention projects have the following additional limitations on eligibility with homeless and at risk of homeless:
   a. Must only serve individuals and families that have an annual income below 30% of AMI.

D. CATEGORIES OF AT RISK OF HOMELESSNESS

a. Category 1: Individuals and Families
   i. Has an annual income below 30% of median family income for the area; AND
   ii. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the "homeless" definition; AND
   iii. Meets one of the following conditions:
      1. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
      2. Is living in the home of another because of economic hardship; OR
      3. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; OR
      4. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; OR
      5. Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half person per room; OR
      6. Is exiting a publicly funded institution or system of care; OR
      7. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved Con Plan
b. Category 2: Unaccompanied Children and Youth
   i. A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statue.
c. Category 3: Families with Children and Youth
   i. An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.

E. PROGRAM GOVERNANCE

City of Tucson and Pima County will continue working with the HUD Regional Office, the Continuum of Care- represented by the Tucson Pima Collaboration to End Homelessness

(TPCH), to ensure successful implementation and performance. A committee will be identified (e.g. Emergency Solutions Committee) to review polices and procedures.

F. FUNDS REALLOCATION AND RECAPTURE

Every six months the City and County ESG Program Coordinators will:

- Review budget allocations for the eligible program components, and will re-allocate resources if necessary;
- Review service data on subpopulations to ensure that the program is serving groups such as military veterans or people with disabilities.

G PROGRAM POSITION DESCRIPTIONS

The following is a summary of each Emergency Solutions Grant Program position related to grant administration and program delivery. Further details about specific program procedures are found in Part III.

1. City of Tucson Project Coordinator

   This position is responsible for administering the ESG grant that was awarded to the City of Tucson. In collaboration with the Pima County Project Coordinator, guides the program by acting as liaison with the Continuum of Care and other contractors, and also monitors agency subcontracts, ensures coordination with other mainstream services and prepares quarterly and annual performance reports to HUD.

2. Pima County Program Coordinator

   This position is responsible for administering the ESG grant that was awarded to Pima County. In collaboration with the City of Tucson Project Coordinator, guides the program by meeting regularly with the Emergency Solutions committee and other contractors, and also monitors agency subcontracts, ensures coordination with other mainstream services and prepares quarterly and annual performance reports to HUD.

H. MARKETING, OUTREACH, AND CLIENT ACCESS

1. Outreach Activities

The City and County Coordinators for the ESG Program will be responsible for ensuring that outreach activities are carried out so that agencies, faith communities, and other organizations that serve at-risk populations are aware of the Emergency Solutions Grant and how to access the ESG Program services. The ESG Program staff contact nonprofits and other community-based organizations to give informational presentations about the ESG Program, and will provide regular reports to Tucson Pima Collaboration to end Homelessness (TPCH), which is the local HUD Continuum of Care.

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Sub-grantees are expected to conduct outreach intended to promote the ESG program targeting the program to persons who are homeless or near homeless so that they are aware of the program and its services.

I. COORDINATION AMONG PROVIDERS

Assistance should be focused on housing stabilization, linking program participants to community resources and mainstream benefits and helping them develop a plan for preventing future housing instability.
Sub-grantees are expected to include component services and activities which may include: case management, counseling, developing, securing and coordinating services, linkage with mainstream services, monitoring and evaluation of program participant progress, assure that program participants' rights are protected, develop and individualized housing and service plans, including a path to permanent housing stability once ESG program assistance is no longer available.

Each sub-grantee will be directed to read and follow ESG guidelines as set forth by the U.S. HUD as they may be amended from time to time. The procedures contained herein serve to simplify the implementation of the regulations and identify allowable activities.

Sub-grantees will serve the population and provide the financial assistance and stabilization services as identified in the budget and scope of work as found in each of their contracts. Preliminary steps to be taken in implementing the ESG activities are as follows:

All agencies receiving ESG assistance are required to participate in the local Homeless Management Information System (HMIS) and execute all Homeless Management Information System required documents as needed. These agencies are also required to actively participate in the Tucson Pima Collaboration to End Homelessness (TPCH). TPCH is the local Continuum of Care and has over 50 member agencies including the local Veteran Administration, Open Inn, Gospel Rescue Mission, and the Primavera Foundation. TPCH continues to encourage mainstream providers such as the Social Security Administration and the Arizona Department of Economic Security to actively participate. It is suggested that agencies participate in the committees that directly relate to their clients to assist in coordinating services.

The Continuum of Care does not yet have a centralized or coordinated assessment system. However, there is a group of agency providers that have been planning a coordinated intake system and it is in the trial stages.

J HMIS: ESG PROGRAM DATA COLLECTION

Client and services information will be collected and recorded using paper forms, and will be entered into the Homeless Management Information System (HMIS) as described in the Procedures section of this manual. Client data on clients served, housing status, and services received must meet HUD standards of completeness and sufficiency. Staff will follow procedures to enter data into HMIS, and will ensure data quality and completeness. Staff will

also keep paper forms in a hard copy client file. Any data or documentation not directly entered into or uploaded to the HMIS will be maintained in the paper file.

Program staff may use client records in HMIS for program verification requirements. For example, if a person presents for services and the intake worker is able to view records in HMIS to confirm that the participant came directly from an emergency shelter (e.g. was in emergency shelter the night before), the intake worker does not need to document housing status (e.g. literally homeless), since the HMIS record provides documentation that the person meets HUD's homeless definition.
If the Program staff member is not able to view the HMIS records for a client, then other documentation will be required, and this will be entered into HMIS

K. PROPERTY VERIFICATIONS AND INSPECTIONS: REQUIREMENTS FOR HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

The ESG Program will conduct housing verifications and inspections as required by HUD.

1. Rent Reasonableness
   A rent reasonableness assessment will be conducted by the city/county staff prior to paying back rent and emergency rent assistance for a current or new rental property to ensure the rental rates are fair market rates.

   Habitability Inspection
   When a re-housing client will move into a new rental, a Habitability Inspection is required to ensure minimum habitability standards and will be conducted by a trained City of Tucson or Pima County inspector. Habitability inspections are also required periodically for emergency shelters.

4. Lead-based Paint
   A Lead-based Paint visual inspection is required for housing and shelters and will be conducted by a trained City of Tucson or Pima County inspector. Housing will be inspected when both of the following conditions exist for a household that has been approved to receive financial assistance from Project Action:
   a. The rental property is older than 1978, as shown by Pima County property records; and
   b. The client household includes a child less than 6 years of age.
   A lead-based paint inspector must be HUD-certified to do a visual assessment for lead based paint.

5. Repeat Inspections
   Inspections will be conducted no more than two times. If unit does not pass inspection, one more inspection can be ordered. If the unit doesn't pass inspection a second time, Emergency Solutions Grant staff will assist the client to move to another property that will satisfy these requirements.

L. GRIEVANCE POLICY

If a client or prospective client disagrees with an ESG Program decision, he/she will be provided with a clearly-defined grievance process. The client will use the grievance process that is in effect at the contracted provider agency that provided the ESG Program service that the client wishes to dispute.

M. FRAUD PREVENTION AND RESPONSE

1. ESG Program intake forms that are used to determine eligibility must be signed by the client, and have statements adjacent to the signature area that inform clients that untruthful information may be considered as fraudulent and can lead to investigation and punishment under federal law.

2. If a staff member suspects that a client has provided fraudulent information, she will inform her supervisor. If necessary the Supervisor will inform the City and County Program Coordinators. The Program Coordinator can consult with the City Attorney and/or County Attorney, and the HUD Inspector General to resolve and report the matter, or to conduct further investigation or prosecution.

N. CONFIDENTIALITY

The ESG Program protects client confidentiality in the following ways.

1. Most clients interact solely with their case manager and do not have personal contact with other Emergency Solutions Grant personnel. The case manager will keep client names and personal information confidential except as it is necessary to discuss cases with a supervisor or with other Emergency Solutions Grant personnel for the purpose of case coordination.
2. When Emergency Solutions Grant staff communicates about client services via email they will not share names or social security numbers. Instead they use client I.D. codes that are used in HMIS.
3. Emergency Solutions Grant staff members and contracted personnel will sign confidentiality agreements, and will not discuss Emergency Solutions Grant clients with anyone except as necessary with Emergency Solutions Grant staff.
4. HMIS data reports will present project data in aggregate form with no identifying information.
5. HMIS data systems will be encoded so that client information is kept secure.
6. Clients are informed about their rights regarding personal information and sign consent forms:
   - Informed Consent form, with accompanying Terms of Service form. By signing this form, the client consents to provide information necessary for determining eligibility and providing services.
   - Authorization for Use and Sharing of Information. By signing this form, the client consents to have selected information shared with other providers in order to obtain other services or to coordinate care.
   - Client Authorization Form for HMIS data.

O. CONFLICTS OF INTEREST

No person who is an employee, agent, consultant, officer, or elected or appointed official of the City of Tucson or Pima County and who exercises or has exercised any functions or responsibilities with respect to ESG activities, or who is in a position to participate in an ESG decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds there under, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

P. NONDISCRIMINATION & EQUAL OPPORTUNITY REQUIREMENTS

The ESG Program will ensure that information about ESG Program assistance is made available to all on a nondiscriminatory basis and ensure that all who seek services are provided equal access using the following methods.

1. Outreach information will be provided to a wide range of services providers and community based organizations.
2. To ensure that outreach materials and services are accessible to persons with limited English proficiency, ESG Program will provide information about the program on both the City and Count Websites as well as maintain a hard copy in the respective offices. Staff members will be available who are bilingual in English and Spanish. When persons seeking services speak languages other than English or Spanish, or have vision or hearing disabilities, ESG Program staff will utilize other translation services to ensure fair access.

Q. AFFIRMATIVELY FURTHERING FAIR HOUSING

The ESG Program will ensure that policies and procedures affirmatively further fair housing opportunities for classes protected under the Fair Housing Act, including race, color, national origin, religion, sex, disability, and familial status. Fair housing procedures will include the following:

1. Marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency;
2. Making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities
3. Providing fair housing counseling services or referrals to fair housing agencies;
4. Informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1800-669-9777; and
5. Recruiting landlords and service providers in areas that expand housing choice to program participants.

III. ESG PROGRAM COMPONENT POLICIES

A. STREET OUTREACH

The ESG Program may provide the following services to eligible clients in order to connect unsheltered homeless with emergency shelter, housing, or critical services.

- Engagement
- Case Management
- Emergency health and mental health services
- Transportation
- Services for special populations (special populations include homeless youth, homeless persons with HIV/AIDS, and homeless victims of domestic violence, sexual violence, and stalking).

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2) Shelter Stay Procedures

3) Essential Services

4) Shelter Outreach Performance Measures

B. **EMERGENCY SHELTER**

The ESG Program may provide for the following services to maintain or convert homeless shelter sites, provide essential services or assist with shelter operations.

- Case management
- Childcare
- Education
- Employment
- Life skills services
- Legal services
- Health
- Mental health
- Substance abuse services
- Transportation
- Services for special populations
- Operations (e.g., maintenance, utilities, furniture, food)

1) Policy for Admission

2) Policy for Diversion

3) Policy for Referral and Assessment of Needs

4) Policy for Discharge
5) Emergency Shelter Performance Measures

C. HOMELESSNESS PREVENTION

The ESG Program funds may be used to provide housing relocation and stabilization services and rental assistance to those who earn 30% or less of the Area Median Income. Financial assistance will not be provided to a household for a purpose and time period supported by another public source.

- Housing relocation and stabilization services
- Short-and medium-term rental assistance
- Short-term = up to 3 months
- Medium-term = 4 to 24 months
  - Up to 24 months of rental assistance during any 3-year period, including one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent.
- Moving costs
- Rent application fees

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- Security deposits
- Last month's rent
- Utility deposit
- Utility payments
- Housing search/ placement
- Housing stability case management
- Mediation and legal services
- Credit repair/ budgeting/ money management

1) Evaluating Eligibility for Assistance for Homelessness Prevention

Minimum requirements to be eligible for Rapid Re-Housing Assistance:

Client eligibility will be assessed in-person. Appointments will be made with the designated providers. During these appointments the clients will be informed about the resources within their community and offered suggestions.

Clients must meet eligibility requirements and provide documentation described below.
Client must:

1. Not more than 30% of the Area Median Income.
    1. Clients are permitted to have some assets, e.g. car, retirement plan, with maximum of $3,000 (not including checking and/or savings).
    2. Have resided in Pima County for the past three months or longer.
    3. Be either
        1. Homeless (based on current HUD homelessness definition), or
        2. Are about to lose their housing due to scheduled eviction or foreclosure, and have no other networks or resources to avoid homelessness, i.e., would become homeless but for this assistance.
    4. Have experienced a sudden and significant change making it hard to pay rent or utilities, and, after a short or medium period of assistance, be likely to sustain stable housing on his/her own. Examples of sudden and significant changes include, but are not limited to:
        1. Sudden loss of income
        2. Unforeseen finance set back or life change
        3. Loss of job or reduced hours
        4. Medical issues
        5. Medical bills caused inability to pay other bills
        6. Car repairs
        7. Student Financial Aid disrupted
        8. Divorce or break up of a relationship
        9. Death in family
        10. Lost roommate or other living arrangements
    5. Be willing to participate in a case plan that includes goals for improving his/her situation, such as job search activities.
    6. Must provide verification documents:
        1. Picture I.D.
        2. Social Security Card

3. Birth Certificate
4. Proof of income
5. Bank statement
6. Bills that show cause/ need
7. Proof of residency
8. Eviction notice or a copy of the Notice of Trustee's sale and has a written lease agreement or a deed that corresponds with the foreclosure documents
9. Utility disconnect bill or proof of delinquent amount
10. Invoice for moving assistance

7. Demonstrates ability to maintain their housing and household expenses after assistance

Examples of Reasons the client eligibility may be denied:

- Client does not meet eligibility requirements listed above
- Client did not provide required verification documents
- Client did not agree to having a case plan, or did not follow steps in case plan
- Client used maximum time or assistance allotment
- There were substantiated landlord complaints, and the client did not comply with a correction plan.
  - All sub-grantees must evaluate and certify the eligibility of ESG program participants at least once every three months for all household receiving homelessness prevention assistance, and once annually for households receiving rapid re-housing assistances
    - Initial Consultation
      - Sub-recipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
      - Documentation to verify requirements of this section have been met including completing a client in-take form. All sub-grantees must keep verification of this requirement in each client file.
      - Sub-grantees must verify Income below 30% the Area Median Income.
      - Verification of Homelessness or Risk of Homelessness using the HUD definition as described in Section II. B.
      - The sub-grantee must confirm that the individual or family does not have sufficient resources or support networks.
        - To receive assistance under Homeless Prevention, a client(s) must be *at risk of becoming homeless* and rental assistance is only necessary to prevent the individual or family from moving into an emergency shelter or another place.

2) Determining and Prioritizing Homeless Prevention Assistance

The purpose of the ESG program is to provide assistance to as many individuals and families who face obstacles to sustaining housing as possible. An individual or family's ability to sustain housing is not a threshold requirement. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends.

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Sub-grantees will target assistance to families and individuals who are homeless or who are about to spend their first night at in a shelter or on the street. These families and individuals will be prioritized as follows.

Priority 1: Homeless Families

- Priority 1(a): The homeless family who is in the emergency shelter for less than 30 days
- Priority 1(b): The homeless family who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
- Priority 1 (d): The homeless family or who has been living on the streets for over 30 days

Priority 2: Homeless Youth

- Priority 2(a): The homeless youth who is in the emergency shelter for less than 30 days
- Priority 2(b): The homeless youth who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 2 (c): the homeless youth who has been in the emergency shelter for over 30 days
- Priority 2 (d): The homeless youth or who has been living on the streets for over 30 days

Priority 3: Homeless Individual

- Priority 3(a): The homeless individual who is in the emergency shelter for less than 30 days
- Priority 3(b): The homeless individual who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 3 (c): the homeless individual who has been in the emergency shelter for over 30 days
- Priority 3 (d): The homeless individual or who has been living on the streets for over 30 days

3) Rent & Utilities Policy: Homeless Prevention

<u>Rent</u>

Sub-grantees will require program participants to pay a portion of the rent expense based on the individual or families' available income (up to thirty percent 30%). Participants are expected to contribute a portion of their income to pay for rent. Household income and rent contribution will be calculated based on household available income at the time of certification. Any household income increase must be reported to the sub-grantee within seven (7) days and the new rent contribution amount adjusted. Income shall be reassessed every three months for medium term rental assistance.

Sub-grantees my increase the household's contribution to the rent and utility cost as they acquire more financial independence and stability. An increase will be documented in the client's plan.

Rental assistance may be used to pay up to 3 months of rental arrears for eligible program participants. Rental arrears may be paid if the payment enables the program participant to return to the housing unit for which the arrears are being paid or move to another unit.

APPENDIX A

Rental arrears may be paid regardless of when they were incurred, provided that the existence of arrears prevents the eligible participant from obtaining housing. Payment for rental arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 24 months in a 3 year period.

Rental assistance cannot exceed the actual rental costs. Rental assistance payments cannot be made on behalf of eligible participants for the same period of time that rental assistance is being provided through another federal, state or local housing subsidy program.

Sub-grantees providing rental assistance for homeless prevention will be required to conduct initial and any appropriate follow-up habitability inspections of housing units into which a program participant will be moving. Units must be inspected on an annual basis and upon a change of tenancy. In addition, Lead Based Paint requirements must be met when applicable.

When a rental unit has been located, sub-grantees may need to assist the client in contacting the landlord to complete the appropriate paperwork and conduct a habitability standards inspection. Agencies must have acceptable documentation showing a participant in need of rental assistance. Documentation may be in the form of an eviction notice from a landlord or a letter stating intent to evict.

Sub-grantees must use fair market rent standard to determine eligibility. Sub-grantees should assist program participants to locate a rental unit at or below fair market rent.

Security Deposits and Utility Deposits

ESG Program funds may be used to pay security deposits and utility deposits. Security and utility deposits may only be paid with ESG funding if the program participant will otherwise be homeless without assistance.

Security and utility deposits covering the same period of time in which other assistance is being provided through another housing subsidy program are eligible, as long as they cover different costs types.

Security and utility deposits may be paid as a one-time grant not to exceed the monthly rental amount. Information documenting the need for a security deposit should be obtained at the same time the required rental paperwork is being completed by the client and landlord.

Sub-grantees must conduct a habitability standards inspection on any unit that a program participant will be moving into using ESG program funds for a security or utility deposit. Agencies must certify that the unit has passed habitability standards before any ESG program funds will be released.

Utility Payments

ESG Program funds may be used for up to 6 months of utility payments, including up to 3 months of utility payments in arrears. The program participant, or a member of the participant's household, must have an account in his/her name with a utility company. The participant must have a lease with their name on it to prove residency and verify address of utility service. Copies of the proof of responsibility should be obtained and maintained in the client file. Utility payments will be made directly to the utility company. Documentation must be made to verify that the participant is not receiving the same type of

assistance from another agency for the same period. Also, if utility assistance payments are available from another agency this source should be used first before ESG funds are provided.

4. Standards for Determining Length and Level of Assistance for Homeless Prevention

- No participant may receive more than 24 months of assistance within a 3 year period.
- The maximum amount of assistance is based on FMR less the households 30% of monthly income.
- The maximum number of times the program participant may receive assistance is based on need but may not exceed more than 24 months of assistance in a 3 year period.
- Short-term rental assistance is to be limited to a maximum of 3 months of rent
- Medium-rental assistance shall extend for more than 3 months but not more than 24 months of rent.
- Only the assistance that is needed for a client to become stabilized will be provided.

5. Homeless Prevention Performance Standards

D. RAPID REHOUSING

The ESG Program can be utilized to fund housing relocation and stabilization services and rental assistance to individuals and families who earn 30% or less of the Area Median Income and who can quickly be transitioned into permanent housing and a stable environment. Financial assistance will not be provided to a household for a purpose and time period supported by another public source.

- Housing relocation and stabilization services
- Short-and medium-term rental assistance
  - Short-term = up to 3 months
  - Medium-term = 4 to 24 months
    - Up to 24 months of rental assistance during any 3-year period, including one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent.
- Moving costs
- Rent application fees
- Security deposits
- Last month's rent
- Utility deposit
- Utility payments
- Housing search/ placement
- Housing stability case management
- Mediation and legal services
- Credit repair/ budgeting/ money management

1) Evaluating Eligibility for Assistance for Rapid Re-Housing

Minimum requirements to be eligible for Rapid Re-Housing Assistance:

APPENDIX A

Client eligibility will be assessed in-person. Appointments will be made with the designated providers. During these appointments the clients will be informed about the resources within their community and offered suggestions.

Clients must meet eligibility requirements and provide documentation described below.

1. Client's income must be below 30% of the Area Median Income.
    1. Clients are permitted to have some assets, e.g. car, retirement plan, with maximum of $3000 in liquid assets (readily available money).
2. Have resided in Pima County for the past three months or longer.
3. Be either
    1. Homeless (based on current HUD homelessness definition), or
    2. Are about to lose their housing due to scheduled eviction or foreclosure, and have no other networks or resources to avoid homelessness, i.e., would become homeless but for this assistance.
4. Have experienced a sudden and significant change making it hard to pay rent or utilities, and, after a short or medium period of assistance, be likely to sustain stable housing on his/her own. Examples of sudden and significant changes include, but are not limited to:
    1. Sudden loss of income
    2. Unforeseen finance set back or life change
    3. Loss of job or reduced hours
    4. Medical issues
    5. Medical bills caused inability to pay other bills
    6. Car repairs
    7. Student Financial Aid disrupted
    8. Divorce or break up of a relationship
    9. Death in family
    10. Lost roommate or other living arrangements
5. Be willing to participate in a case plan that includes goals for improving his/her situation, such as job search activities.
6. Must provide verification documents:
    1. Picture I.D.
    2. Social Security Card
    3. Birth Certificate
    4. Proof of income
    5. Bank statement
    6. Bills that show cause/ need
    7. Proof of residency
    8. Eviction notice or a copy of the Notice of Trustee's sale and has a written lease agreement or a deed that corresponds with the foreclosure documents
    9. Utility disconnect bill or proof of delinquent amount
    10. Invoice for moving assistance
7. Demonstrates ability to maintain their housing and household expenses after assistance

Examples of Reasons the client eligibility may be denied:

- Client does not meet eligibility requirements listed above

- Client did not provide required verification documents
- Client did not agree to having a case plan, or did not follow steps in case plan
- Client used maximum time or assistance allotment
- There were substantiated landlord complaints, and the client did not comply with a correction plan.

- All sub-grantees must evaluate and certify the eligibility of ESG program participants at least once every three months for all household receiving homelessness prevention assistance, and once annually for households receiving rapid re-housing assistances
  - Initial Consultation
    - Sub-recipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
    - Documentation to verify requirements of this section have been met include completing a client in-take form. All sub-grantees must keep verification of this requirement in each client file.
    - Sub-grantees must verify Income below 30% of the Area Median Income.
    - Verification of Homelessness or Risk of Homelessness using the HUD definition as described in Section II. B.
    - The sub-grantee must confirm that the individual or family does not have sufficient resources or support networks.
      - To receive assistance under HOMELESSNESS PREVENTION client(s) must be *at risk of becoming homeless* and rental assistance is only necessary to prevent the individual or family from moving into an emergency shelter or another place.

2) Determining and Prioritizing Rapid Re-Housing Assistance

The purpose of the ESG program is to provide homeless prevention assistance to as many homeless individuals and families who face obstacles to obtaining and sustaining housing as possible. An individual or family's ability to sustain housing is not a threshold requirement. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends.

Sub-grantees will target assistance to families and individuals who are homeless or who are about to spend their first night at in a shelter or on the street. These families and individuals will be prioritized as follows.

Priority 1: Homeless Families

- Priority 1(a): The homeless family who is in the emergency shelter for less than 30 days
- Priority 1(b): The homeless family who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
- Priority 1 (d): The homeless family or who has been living on the streets for over 30 days

Priority 2: Homeless Youth

- Priority 2(a): The homeless youth who is in the emergency shelter for less than 30 days
- Priority 2(b): The homeless youth who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 2 (c): the homeless youth who has been in the emergency shelter for over 30 days
- Priority 2 (d): The homeless youth or who has been living on the streets for over 30 days

Priority 3: Homeless Individual

- Priority 3(a): The homeless individual who is in the emergency shelter for less than 30 days
- Priority 3(b): The homeless individual who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 3 (c): the homeless individual who has been in the emergency shelter for over 30 days
- Priority 3 (d): The homeless individual or who has been living on the streets for over 30 days

3) Rent & Utilities Policy: Rapid Re-Housing

Rent

Sub-grantees will require program participants to pay a portion of the rent expense based on the individual or families' available income thirty percent (30%) or less. Participants are expected to contribute a portion of their income to pay for rent. Household income and rent contribution will be calculated based on household available income at the time of certification. Any household income increase must be reported to the sub-grantee within seven (7) days and the new rent contribution amount adjusted. Income shall be reassessed every three months for medium term rental assistance.

Sub-grantees my increase the household's contribution to the rent and utility cost as they acquire more financial independence and stability. An increase will be documented in the client's plan.

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Sub-grantees providing rental assistance for rapid re-housing will be required to arrange initial and any appropriate follow-up habitability inspections of housing units into which a program participant will be

moving. Units must be inspected on an annual basis and upon a change of tenancy. In addition, Lead Based Paint requirements must be met when applicable.

When a rental unit has been located, sub-grantees may need to assist the client in contacting the landlord to complete the appropriate paperwork and conduct a habitability standards inspection. Agencies must have acceptable documentation showing a participant in need of rental assistance. Documentation may be in the form of an eviction notice from a landlord or a letter stating intent to evict.

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- Medium-rental assistance shall extend for more than 3 months but not more than 24 months of rent.

- Only as much assistance needed to become stabilized will be provided.

5) Rapid Re-Housing Performance Standards

E. INELIGIBLE SERVICES NOT PROVIDED BY THE ESG PROGRAM

- Mortgage costs
- Credit card bills or other consumer debt
- Pet care
- Entertainment activities
- Cash assistance directly to participants

F. TERMINATION OF ASSISTANCE

A sub-grantee may terminate assistance to a program participant who violates program requirements. Sub-grantees may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the sub-grantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law.

For Homeless Prevention and Rapid Re-Housing rental assistance the process of termination, at minimum, must consist of:

A. Written notice to the program participant containing a clear statement of the reasons for terminations;
B. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person who made or approved the termination decisions; and
C. Prompt written notice of the final decision to the program participant

IV. ESG PROGRAM ADMINISTRATION

1. Procedures for Annual Plan and CAPER Reports
2. Use of IDIS
3. Monitoring Direct Service Contractors
   a. Purpose
   b. Frequency
   c. Findings
   d. Follow-up Procedures

V. SUMMARY OF ESG PROGRAM PERFORMANCE STANDARDS

Pima County and the City of Tucson in consultation with the Continuum of Care will develop performance standards that will provide measures to evaluate the effectiveness of 1) Targeting

those who need the assistance the most; 2) reducing the number of people living on the streets and emergency shelters; 3) shortening the time people spend homeless; and 4) reducing each program participant's housing barriers or housing stability risks.

ESG Program Performance Standards	
Activity	**Outcome/ Outputs**
Street Outreach	Number of persons: • Placed in shelter or safe havens • With more non-cash benefits at program exit • Participating in case management
Emergency Shelter	Number of persons: • Exiting to temporary or transitional housing destinations • Exiting to permanent housing destinations • Participating in case management
Homelessness Prevention	Number of persons: • Who maintained their permanent housing for 6 months or longer • Exiting to permanent housing destinations • With higher income at program exit • With more non-cash benefits at program exit • Participating in case management
Rapid Re-Housing	Number of persons: • Who maintained their permanent housing for 6 months or longer • Exiting to permanent housing destinations • With higher income at program exit • With more non-cash benefits at program exit • Participating in Case Management

ADOPTED BY THE
MAYOR AND COUNCIL

May 7, 2013

RESOLUTION NO. 22042

RELATING TO PUBLIC HOUSING; APPROVING THE CITY OF TUCSON ANNUAL ACTION PLAN FOR CITY FISCAL YEAR 2014 (CITY FY 2014) AND HUD FISCAL YEAR 2013 (HUD FY 2013); AUTHORIZING AND DIRECTING SUBMITTAL OF THAT PLAN TO THE UNITED STATES DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT (HUD); AND DECLARING AN EMERGENCY.

WHEREAS, the United States Department of Housing and Urban Development (HUD) requires communities receiving federal funding to submit Annual Plans describing the activities that will be funded in FY 2014 to meet the goals stated in the 2010–2015 Consolidated Plan; and

WHEREAS, the Annual Action Plan details operational concerns and programmatic needs and changes for the upcoming fiscal year; and

WHEREAS, the Public Housing Authority (PHA) will have complied with the thirty (30) day comment period on May 6, 2013, and made a draft of the Plan available to the public on April 5, 2013 and posted the Plan on the City's website at http://cms3.tucsonaz.gov/files/hcd/2014AAP.pdf; and

WHEREAS, updates to the Annual Action Plan include information on funding and continued implementation of projects in the Community Development

Block Grant (CDBG) program; Homes Investment Partnerships (HOME) program; Emergency Solutions Grant (ESG) program, and Housing Opportunities for People with AIDS (HOPWA) program, the continuing efforts of the PHA to address housing needs of the families in the jurisdiction and on housing assistance waiting lists and progress in meeting the mission and goals from the Five Year Plan. Those goals include improving the quality of assisted housing, providing an improved living environment, promoting self-sufficiency and asset development of assisted households, and ensuring equal opportunity and affirmatively furthering fair housing.

NOW, BE IT RESOLVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, AS FOLLOWS:

SECTION 1. The Mayor and Council hereby approves the City of Tucson Annual Action Plan for CITY FY 2014 and HUD FY 2013, attached hereto as Exhibit A and by this reference fully incorporated herein.

SECTION 2. The Director of the City's Housing and Community Development Department or the Director's designee is hereby authorized and directed to execute as many counterparts of said Exhibit A and such other related documents as may prove necessary or appropriate to achieve the ends of this resolution and to submit the same to HUD.

SECTION 3. The various City officers and employees are authorized and directed to perform all acts necessary or desirable to give effect to this resolution.

SECTION 4. WHEREAS, it is necessary for the preservation of the peace, health and safety of the City of Tucson that this resolution become immediately

effective, an emergency is hereby declared to exist and this resolution shall be effective immediately upon its passage and adoption.

PASSED, ADOPTED AND APPROVED BY THE MAYOR AND COUNCIL OF THE CITY OF TUCSON, ARIZONA, May 7, 2013.

MAYOR

ATTEST:

CITY CLERK

APPROVED AS TO FORM

CITY ATTORNEY

REVIEWED BY:

CITY MANAGER

JH:ct
4/22/2013 10:53 AM

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