



Fifth Program Year Action Plan

The CPMP Fifth 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

Program Year 5 Annual Action Plan Executive Summary:

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance. *Please note that this document refers to the City of Tucson Fiscal Year (FY) 2015, reflecting HUD's 2014 program year appropriations.*

Plan Requirements and Background

Cities with populations of at least 50,000 residents are eligible to receive annual entitlement funding from the U.S. Department of Housing and Urban Development (HUD) under the federal programs and regulations listed below. The City of Tucson, as a HUD entitlement jurisdiction will receive the following funds for Fiscal Year (FY) 2015 covering the time period July 1, 2014 through June 30, 2015:

<u>Annual Entitlement/Formula Grant Programs</u>	<u>FY 2015 Allocation (as of 3/18/14)</u>
<u>Community Development Block Grant (CDBG)</u>	\$5,133,873
24 CFR Part 570*Code of Federal Regulations (CFR)	
<u>HOME Investment Partnership (HOME)</u>	\$2,625,360 (Consortium)
	<u>(City \$1,890,259 and Pima County \$735,101)</u>
24 CFR Part 92* Code of Federal Regulations (CFR)	
<u>Emergency Solutions Grant (ESG)</u>	\$424,994
24 CFR Part 576* Code of Federal Regulations (CFR)	
<u>Housing for Persons with Aids (HOPWA)</u>	\$453,063
24 CFR Part 574* Code of Federal Regulations (CFR)	
TOTAL Projected <u>City FY 2015 Entitlement Funds:</u>	\$ 8,039,875

Federal Entitlement Funding Formulas: The amount received each year from entitlement grant programs is determined by a statutory dual formula using objective measures of the community's needs as they relate to other metropolitan areas. These measures include the amount of poverty in the community, the population of the City, housing overcapacity, the age of existing housing and population growth lag. For details regarding formula funding calculations see Hud.gov, CPD Appropriations Budget.

To receive these federal funds, every five years the City of Tucson Department of Housing and Community Development (HCD) is required to work with the community to prepare a 5-year Consolidated Plan. The Consolidated Plan must be adopted by Mayor and Council and submitted to HUD for approval. The existing City of Tucson adopted FY 2010 – FY 2015 Consolidated Plan lists needs, priorities, and goals for affordable housing, community development and Human/Public Services programs designed to assist low, very-low and extremely low-income residents for the 5-year period beginning July 1, 2010 through June 30, 2015. These qualifying incomes are calculated, published and updated by HUD on a regular basis and are defined as follows:

- Low-income = 80% of area median income based on household size
- Very low-income = 50% of area median income based on household size
- Extremely low-income = 30% of area median income based on household size

See page 29 of this FY 2015 Annual Action Plan for current HUD income guidelines.

As allowed under HUD program regulations, the City of Tucson and Pima County opted to form a HOME Program Consortium for HOME funding and allocations. This identifies Tucson and Pima

County as a “participating jurisdiction” (PJ) with the City of Tucson as the lead agency. This PJ designation requires that the two local governments coordinate in the preparation of the 5-year Consolidated Plan.

The 5-year Consolidated Plan serves as a guide for annual investments of City and County project funds. For each of the five years covered by the Consolidated Plan, each local government is required to prepare an Annual Action Plan that correlates with the needs, priorities and goals specified in the Consolidated Plan, showing how annual entitlement funds will be allocated to meet the overall 5-year goals. The City’s Annual Action Plan must be adopted by Mayor and Council and submitted for HUD approval each fiscal year before the City can make local project expenditures using the annual entitlement funding for that fiscal year. This is the fifth annual action plan for the 5-year period. The City of Tucson will begin the planning process to prepare the FY 2016 – FY 2020 (July 1, 2015 through June 30, 2020) during FY 2015.

Eligible Activities and Projects

As outlined in Code of Federal Regulations (CFR) for each formula grant program (listed above on page 2), entitlement communities may use their formula grant funding for a wide range of community projects including:

- Acquisition, repair and development of affordable housing;
- Neighborhood revitalization and improvements in low-income neighborhoods;
- Economic development and job creation;
- Public facilities; and
- Supportive Human/Public Services.

To be considered for funding, projects must be consistent with the goals stated in the FY 2010- FY 2015 City of Tucson and Pima County Consolidated Plan under the following HUD categories:

- Affordable Housing;
- Homelessness;
- Community Development; and
- Non-Homeless Special Needs.

Existing City of Tucson Projects supported by entitlement funding from previous program years that are not currently on schedule for completion and/or have not drawn down funds, will be evaluated for progress and compliance before additional funds can be allocated to support those projects in the FY 2015 program year.

Eligible projects may be directly implemented by the local government or administered through partner agencies and eligible contractors, designated as “sub-recipients”. All federal regulations apply to projects that are supported with HUD formula grant funding. This includes federal procurement procedures, financial management and program record keeping, client in-take and household eligibility, fair housing practices, compliance with the Americans with Disabilities Act (ADA), pre-development, project management, job-site employment, and construction practices. These requirements are referenced in the federal program regulations (listed on page 2 of this document) and are incorporated into sub-recipient contracts.

This Annual Action Plan lists the City’s projected allocations, goals, objectives and performance measures for FY 2015 for the identified projects. The projects and funding commitments are subject to change based on project close-out for FY 2014 and City of Tucson budget discussions.

FY 2015 Planning Process and Funding Summary for the City of Tucson

The projected FY 2015 HUD formula grant funding levels (dollar amounts) listed below and the project categories in this FY 2015 Annual Action Plan were determined by:

- 1) Federal funding levels and parameters established in federal program regulations* cited on page 2 of this document;
- 2) Any priorities listed in the City's FY 2010 – FY 2015 Consolidated Plan that had not been addressed in the previous four years;
- 3) The City of Tucson CDBG Target Area adopted by the Mayor and Council in the FY 2014 Annual Action Plan and the City of Tucson CDBG Section 108 loan program approved by HUD on March 7, 2012;
- 4) Any previously approved and existing multi-year contractual commitments for activities that are supported with these federal entitlement funds; and/or
- 5) Project specific Request for Proposals (RFP) processes as noted below.

Summary of Proposed Expenditures - FY 2015 HUD Formula Grant Programs

Funding Category	CDBG	HOME	ESG	HOPWA
Administration	\$947,775	\$252,299	\$27,929	\$13,592
Affordable Housing	\$2,257,711	\$1,409,818		
CHDO's		\$393,804		
Community Development	\$966,310			
Homelessness	\$252,580		\$424,994	
Non-Homeless Special Needs	\$217,500			\$439,471
Economic Development	\$75,000			
Section 108	\$120,000			
Planning	\$75,000			
Other Funds* Carry Forward Program Income Match Leverage	\$1,484,910*	\$647,460	\$424,994	0

*Contingent upon approval of final City of Tucson FY 2015 budget.

FY 2015 City of Tucson HUD Formula Grant Allocations

Community Development Block Grant (CDBG) Funds

The CDBG program is a flexible program that provides communities with resources to address a wide range of unique community development needs. (See the 'Housing and Community Development Act of 1974'.) The basic goals of the program are to:

- Provide decent, safe and sanitary housing;
- Provide a suitable living environment; and
- Expand economic opportunities.

Examples of Eligible Activities that can be carried out with CDBG funds include:

- Real Property and Housing-related activities (570.201 and 202);

- Human/Public Services activities (570.201(e));
- Economic Development activities (570.203, 204 and 201(o); and
- Planning and Administration (570.205 and 206).

CDBG assisted activities must be eligible projects and also meet a National Objective by benefiting low to moderate income persons as below:

- Area benefit (570.208(a)(1));
- Limited clientele activities (570.208(a)(2));
- Housing activities (570.208(a)(3)); or
- Job creation or retention (570.208(a)(4)).

Or aid in the prevention of slums or blight (570.208(b)) based on a geographic area, specific location or in a defined Urban Renewal area.

Or meet an urgent community development need due to a serious and immediate threat of recent origin to the health or welfare of the community that cannot be corrected with other funding sources.

CDBG Funding for FY 2015 Annual Action Plan:

CDBG Program Budget Category	Amount from FY 2015
<u>Planning (P) & Administration</u> Capped at 20% of Total City Administration Planning Contracts 1. Southwest Fair Housing Council (SWFHC) \$25,000 2. Tucson Planning Collaboration for the Homeless (TPCH) \$25,000 3. Community Partnership of Southern Arizona (CPSA) \$25,000	\$1,022,775 Total \$947,775 (admin) \$75,000 (planning project set-asides)
<u>FY 2015 Human/Public Services</u> Capped at 15% of Total Pima Council on Aging \$30,500 United Way \$9,000 Family Self-Sufficiency \$18,000	\$770,080 Total \$712,580 (RFP) \$57,500 (program set-asides)
Housing Rehabilitation Collaborative (8 agencies)	\$2,182,711 Total \$83,000 Lead Grant Match \$914,934 (agency program set-asides) \$1,184,777 (city program set-asides)
Habitat Preserve-A-Home, Year 2 of 2	\$75,000 (ongoing contract)
City Adopted CDBG Target Area – Public Facilities	\$741,310 (RFP process) Estimated Program Income included
City Green and Healthy Facilities, year 2 of 5	\$150,000 (ongoing contract)
Economic Development – Microenterprise Activities	\$75,000 (RFP process)
Section 108 – Tucson Department of Transportation (TDOT) ADA Repayment (P&I)	\$120,000 (\$100,000 dedicated to Year 1 Repayment for adopted CDBG Section 108 program)
TOTAL:	\$4,189,100 (projects & planning) \$947,776 (admin only, no planning) \$5,136,876 ALLOCATION

FY 2015 City CDBG Funds: \$5,113,873
Other funds: \$20,000 (estimated program income)
Total CDBG Grant Funds Available: \$ 5,133,873

HOME Investment Partnerships Program (HOME) Funds

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.

HOME Funding for FY 2015 Annual Action Plan:

HOME Program Budget Category	Amount from FY 2015
Administration (10% for cap for City and County)	\$262,536
City Tenant –Based Rental Assistance	\$20,000
City Rental Housing	\$1,245,999
City Homeownership	\$143,899
Community Housing Development Corporations (CHDO)	\$393,804 Projects
Pima County Projects	\$559,202
TOTAL for Consortium:	*\$2,625,360

FY 2015 City HOME Funds: \$2,625,360
Other funds: \$647,460 (Program income and match)

TOTAL City HOME Funds Available: \$3,272,820

Emergency Solutions Grant Program (ESG) Funds:

ESG funds are used to assist homeless persons with housing and supportive services.

ESG Funding for FY 2015 Annual Action Plan:

ESG Program Budget Category	Amount from FY 2015
Administration	\$27,929
Emergency Shelter Support	\$94,458
Homeless Prevention	\$90,000
Rapid Re-Housing	\$125,000
Street Outreach	\$82,607
HMIS	\$5000
TOTAL:	\$424,994

FY 2015 City ESG Funds: \$424,994
Other Funds \$ 424,994 (100% match
requirement)

TOTAL ESG and Human/Public Services Funds Available: \$849,988

Housing Opportunities for Persons with AIDS (HOPWA) Funds:

HOPWA funds are used to assist persons with HIV/AIDS with housing and supportive services.

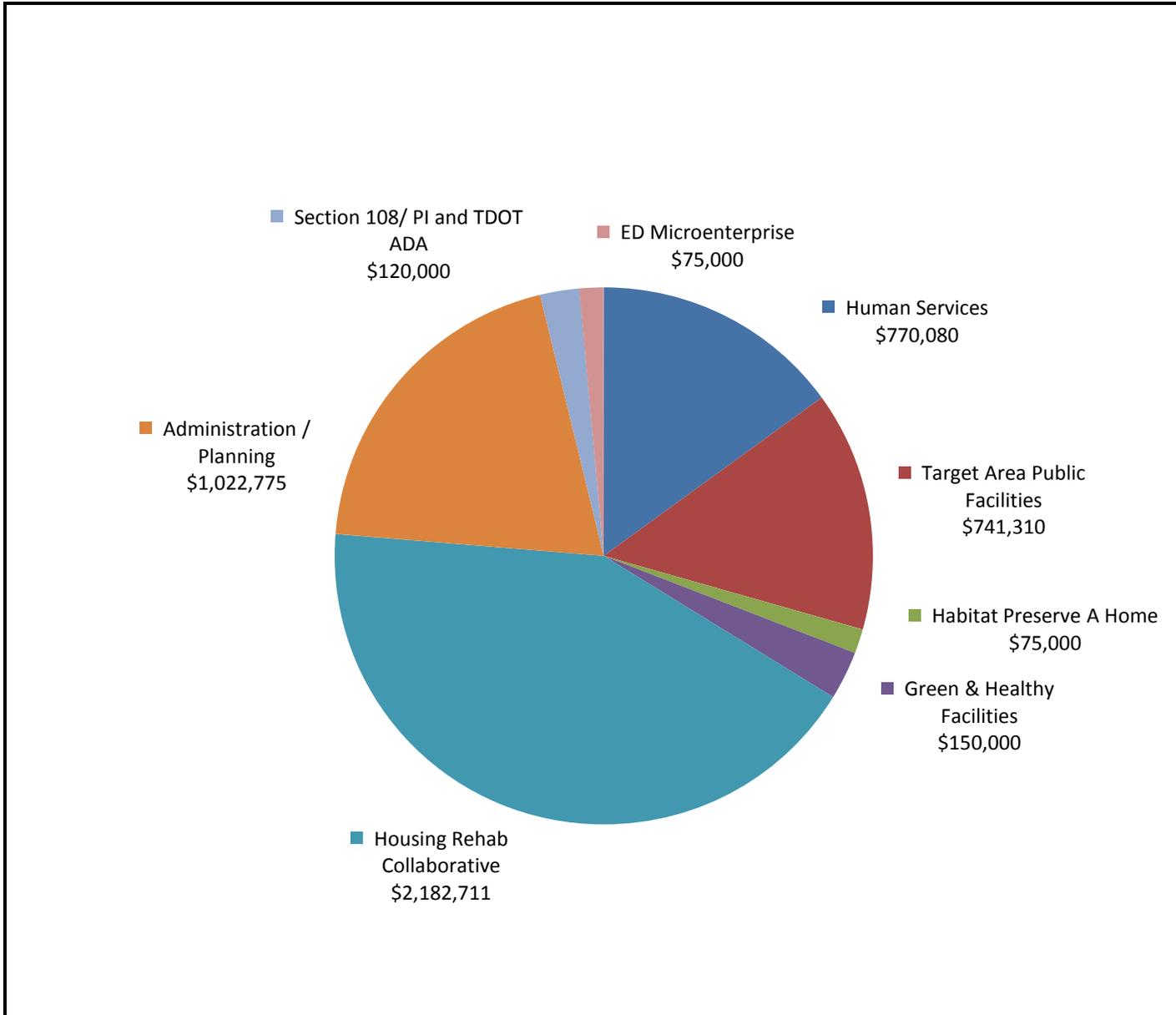
HOPWA Funding for FY 2015 Annual Action Plan:

HOPWA Program Budget Category	Amount from FY 2015
City Program Administration	\$13,592
Southern Arizona Aids Foundation (SAAF)	\$439,471
Total:	\$453,063

FY 2015 City HOPWA Funds **\$ 453,063**
TOTAL HOPWA Funds **\$ 453,063**

Proposed FY 2015 Project Distributions for TOTAL Funds

Proposed Distribution of FY 2015 CDBG Funds



Community Development Block Grant (CDBG) Project Funds

CDBG funds are used to support the Housing Rehab Collaborative, local historic preservation activities, neighborhood improvements and public facilities, economic development and job creation, Americans with Disabilities Act (ADA) compliance and human/public services. The City of Tucson is expected to receive \$5,113,873 in CDBG funds for FY 2015, a 2% reduction from FY 2014. CDBG funds are allocated by Project Specific Application (PSA), set-asides (SA) and by Requests for Proposals (RFP). The City will fund the above activities with CDBG project funds.

Home Investment Partnership (HOME) Project Funds

HOME entitlement grants are used to address the affordable housing needs identified in the City of Tucson and Pima County Consortium 5-year Consolidated Plan. The Consortium is expected to receive \$2,625,360 in HOME funds for FY 2015, a 5% increase from FY 2014. City of Tucson HOME funds are used to carry out local historic preservation activities associated with affordable housing, acquire and rehabilitate affordable rental property and build new affordable housing. The City of Tucson FY 2015 portion of the Consortium HOME funds is \$1,890,259 (includes program administration); and the Pima County FY 2015 portion of HOME funds is \$735,101 (includes program administration). From those two amounts Community Housing Development Organizations (CHDO's) will receive \$393,804 for projects. Beginning in FY 2015 the Consortium will no longer allocate operating funds to CHDO's. HOME funds are allocated by Project Specific Application (PSA) and Set-Asides (SA). The City proposes to fund the following activities with \$1,409,818 in FY 2015 HOME project funds (does not include \$196,902 for City HOME program administration).

City of Tucson HOME Program	Activity	Amount
Housing Development Projects	Develop affordable ownership units	\$143,819
Rental Development & Preservation Projects	Develop & preserve rental units	\$1,245,999
Tenant Based Rental Assistance Projects	Security & Utility Deposits for clients in City of Tucson Housing Assistance Division Specialty Programs: VASH/Family Unification/51 Homes/NED-2 (non-elderly disabled)	\$20,000
TOTAL City Projects		\$1,409,818
City CHDO Projects		\$283,539

City of Tucson/Pima County COMMUNITY HOUSING DEVELOPMENT ORGANIZATIONS

The HOME Program requires that Participating Jurisdictions (PJ's) set aside a minimum of 15% of their HOME allocation funds for utilization by eligible non-profit agencies designated as Community Housing Development Organizations (CHDO's). Under new revisions to the HOME regulations, these CHDO's must now staff a full-time housing director/manager who can document their qualifications and experience as a 'housing professional'. The use of consultants in this capacity is no longer allowed by HOME/HUD. Furthermore, there is no longer annual certification of non-profits as 'CHDO's.' In lieu thereof, CHDO's must actually be certified as such prior to the funding of any qualifying CHDO project by the respective PJ HOME staff. Within the current City of Tucson/Pima County HOME Consortium, there are nine (9) CHDO's: Chicanos Por La Causa (CPLC) Compass Affordable Housing, Drachman Design Build, Habitat For Humanity, International Sonoran Desert Alliance (ISDA), La Frontera Partners, Old Pueblo Community Services, Primavera Foundation, and TMM Family Services.

Emergency Solutions Grant (ESG) Project Funds

ESG funds are used to support the human/public services programs that assist homeless persons. The City of Tucson will receive \$424,994 in ESG funds for FY 2015, a 14% increase from FY 2014.

ESG funds were allocated through a Request for Proposals (RFP) process which included participation from the agencies involved in the local Continuum of Care for the Homeless (see page 43 and 44 of the FY 2015 Annual Action Plan.) The City will fund the following activities with \$397,065 in ESG project funds (does not include \$27,929 for program administration). The City/County ESG Policy Manual is attached as Appendix A to this document.

Agency	Project	Emergency Shelter Support	Homeless Prevention	Rapid Re-housing	Street Outreach	HMIS	Admin
Chicanos Por La Causa	Emergency Assistance		\$45,000				
Emerge! Center Against Domestic Abuse	Rapid Re-housing for Survivors of Domestic Abuse	\$30,000		\$85,000			
Our Family Services, Inc	New Beginnings Homeless Prevention Program		\$45,000	\$40,000	\$30,000		
Our Family Services, Inc.	Rapid Rehousing	\$30,000					
Primavera Foundation	Emergency Family Shelter	\$34,458					
Pima County	HMIS					\$5,000	
City of Tucson	Obtaining ID for homeless people to receive services				\$52,607		
City of Tucson	Administration						\$27,929
Total*		\$94,458	\$90,000	\$125,000	\$82,607	\$5,000	\$27,929

Housing Opportunities for People with AIDS (HOPWA) Project Funds

HOPWA funds are used to support the City's housing programs that provide housing opportunities and assistance to people with HIV/AIDS. The City of Tucson will receive \$453,063 in FY 2015, a 4.5% increase from FY 2014. HOPWA funds were allocated through a set-aside (SA). The City will contract with the Southern Arizona AIDS Foundation (SAAF) to provide the following services to people living with HIV/AIDS:

FY 2015 Annual Action Plan HOPWA Funding

<p>SAAF Project Level Assistance Service Category</p> <ul style="list-style-type: none"> ▪ 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 	<p>Services are provided on a case basis; specific amounts for each service category will be reported in the FY 2015 Consolidated Annual Production & Evaluation Report (CAPER)</p>
Total:	\$439,471

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. Information from the City of Tucson FY 2013 Consolidated Annual Production and Evaluation Report (CAPER) is included below.

City of Tucson Accomplishments – FY 2010- FY 2015 Consolidated Plan Goals

Activity	Annual Goals	FY 2011	FY 2012	FY 2013 CAPER	2 year Cumulative Totals	Five-Year Goals
New Homeownership Opportunities	165 units	216 units	319 units	35 units	354 units	825 units
Homeowner Assistance Rehabilitation	474 households	375 households	474 households	514 households	988 households	2,370 households
Rental Production	184 units	214 units	478 units	640 units	1,118 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)	7,590 Persons assisted (100+ units of service)	17,030 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	8,070 persons assisted	14,619 persons assisted	31,025 persons assisted
Public Services (Human/Public 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)	33,631 persons 20,951 (CDBG) 2,548 (ESG) 10,132 (General Funds)	72,561 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	14 facilities 3 underway 6 projects	18 facilities/ projects	60 facilities/ projects
Infrastructure	0-1 project	0 miles	0 miles	0 miles	0 projects	3 projects

Housing Production and Rehabilitation

Housing quality and affordability affects individual households and neighborhoods. Housing that is safe and affordable is crucial to a healthy, vibrant community. Without it, there is an increase in homelessness, need for public assistance and criminal behavior, as well as a decline in educational performance and proper nutritional health. Deteriorating neighborhood conditions and a shortage of safe, decent affordable housing can also have an adverse impact on community health indicators, like increases in disease and mental impairments caused by a toxic environment.

Between 2006 and 2011, the Tucson-area median sales price for housing dropped \$60,000 or 27%, creating the potential for a larger pool of low-income buyers to enter the Tucson homeownership market. In 2011, a median priced home was within reach of nearly one-half of Tucson area households and the assistance required by a moderate income buyer was reduced from \$95,600 to \$36,200. This gap was an opportunity to employ multiple strategies to assist first-time homebuyers, including down payment assistance and interest rate buydowns. At the same time, stricter underwriting criteria and competition from real estate investors continued to hamper the purchasing efforts of Tucson and Pima County's low and moderate income households. Based on a recent market analysis, Tucson's median home prices have increased. As of March 18, 2014 the original January 1, 2014 HOME Homeownership value limits for existing single family homes were adjusted from \$130,000 to \$159,600. The January 1, 2014 HOME homeownership value limits for newly constructed homes did not change and remains at \$195,000.

The City of Tucson is on track to meet the Homeownership Housing Objectives for this 5-year Consolidated Plan period, which include:

1. Rehabilitate and/or replace 2,370 existing substandard housing units, using historic preservation best practices and the lead abatement program.
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 neighborhoods.
4. Acquire and rehabilitate 250 foreclosed properties using the Neighborhood Stabilization Program (NSP) funds for purchase by households, including middle-income households. (See NSP Program description beginning on page 16.)

VACANT AND NEGLECTED STRUCTURES (VANS) PROGRAM

In an effort to support the Neighborhood Preservation Ordinance (NPO), Mayor and Council initiated the Vacant and Neglected Structures (VANS) Program, directing City of Tucson CDBG funds towards the residential demolition, rehabilitation, and interim assistance services for those structures cited/referred to the Code Enforcement Section based on the regulations in the NPO. Moving forward to HUD FY 2013-2014, the predominant service is now residential demolition as the City of Tucson attempts to reduce/eliminate those vacant and neglected structures currently considered to be unsafe, hazardous, and prone to illegal and unhealthy activities. Such activities tend to cause a drain on local police and fire resources, as well. While no new funding is planned for HUD FY 2014-2015, a carry-forward sum of approximately \$300,000 is sufficient to address the projected need.

HABITAT FOR HUMANITY'S 'PRESERVE-A-HOME' PROGRAM

In an effort to achieve a significant impact in addressing the health, safety, quality of life, and financial problems for an entire neighborhood – as opposed to a specific residence – the City of Tucson is partnering with Habitat For Humanity (HFH) staff, local agencies, faith-based organizations, and the vast network of HFT volunteers. With the initial investment of \$75,000 of COT CDBG funds designated for housing repair, the 'Preserve-A-Home' (PAH) Program will augment its original scope of services. Services will include but not be limited to neighborhood clean-ups, graffiti abatement, free meals delivery, weatherization and energy-saving electrical retrofits. With a variety of residential housing rehabilitation services, PAH endeavors to achieve a more holistic face-lift for an entire neighborhood. Further enhancing the value of this partnership is

the fact that those neighborhoods targeted all lie within the recently determined 'high stress/need index' identified and announced by the City of Tucson.

COMMUNITY HOUSING DEVELOPMENT ORGANIZATIONS

The HOME Program requires that Participating Jurisdictions (PJ's) set aside a minimum of 15% of their HOME allocation for utilization by eligible non-profit agencies designated as Community Housing Development Organizations (CHDO's). Recent revisions to the HOME regulations require a full-time housing director/manager who can document their qualifications and experience as a 'housing professional'. The use of consultants in this capacity is no longer allowed by HOME/HUD. Furthermore, there is no longer a requirement for annual certification of non-profits as 'CHDO's.' In lieu thereof, CHDO's must actually be certified as such prior to the funding of any qualifying CHDO project by the respective PJ HOME staff. Within the current City of Tucson/Pima County HOME Consortium, there are nine (9) CHDO's, specifically Chicanos Por La Causa, Compass Affordable Housing, Drachman Design Build, Habitat For Humanity, International Sonoran Desert Alliance, La Frontera Partners, Old Pueblo Community Services, Primavera Foundation, and TMM Family Services.

TUCSON 'HOUSING REHABILITATION COLLABORATIVE'

In February of 2000, the City of Tucson Mayor & Council directed a nine-member network of agencies with the task of addressing, in a collaborative fashion, the issue of deferred maintenance for low- and moderate-income homeowners. The Tucson Housing Rehabilitation Collaborative (HRC) represents all local agencies involved in housing rehabilitation and is beginning its 15th year as a productive and responsive body of housing professionals. The HRC consists of the following agencies: Chicanos Por La Causa (CPLC), City of Tucson Housing & Community Development Department, Community Home Repair Projects/Arizona (CHRP), Direct Center for Independence, Old Pueblo Community Services (OPCS), Pima Council On Aging (PCOA), Rebuilding Together Tucson (RTT), TMM Family Services, and the Tucson Urban League (TUL). With shared access to a central database, the HRC is able to monitor the broad delivery of services to eligible households, enabling the partners to efficiently and fairly expend the annual allocation of \$2,182,711 in CDBG funds. Because one or more of the agencies maintain a 'rapid response' capacity, the HRC is able to quickly respond to the most acute and unhealthy situations that arise. As part of its contribution to the HRC, the City of Tucson maintains a housing rehab staff that is certified by the Environmental Protection Agency (EPA) in environmental disciplines such as Lead Inspector, Risk Assessor, and Lead Supervisor, a capacity that is shared by all other members. While the entire City of Tucson is covered by the Collaborative, an extra effort has been made since 2007 to provide related services to those eligible homes within central core neighborhoods.

MOHAVE STREET REHABILITATION PROJECT

In an effort to maximize the City inventory of affordable housing units, either through acquisition, rehabilitation or development, it was determined via visual inspection and comprehensive structural analysis that this City-owned, 16-unit transitional housing complex was suffering from structural deficiencies, as well as general 'wear and tear' expected for a 50-year old rental property. As such, it was decided to dedicate some of the community's CDBG funds to restore this project so that it could be added to the City's affordable housing inventory. Once the rehabilitation is completed, including a complete environmental assessment by qualified City staff, the Mohave Street complex will be managed by the Primavera Foundation, a highly respected, local non-profit agency with more than 25 years of experience in affordable housing management. In addition, the project will also provide demolition funds under the City's Vacant & Neglected Structures (VANS) Program to

demolish an unsafe residential property on an adjacent lot, thereby creating a safer environment for the children living in the Mojave community. The demolition will be completed by June of 2014 and the comprehensive rehabilitation project should be similarly completed by September, 2014.

NEIGHBORHOOD STABILIZATION PROGRAM (NSP)

In FY 2008 and FY 2011 respectively, the City of Tucson Department of Housing and Community Development applied for and received \$7,286,911 (NSP 1 - FY 2008) and \$2,083,771 (NSP 3 – FY 2011) in two separate competitive awards under the American Recovery and Reinvestment Act of 2009 (the ARRA) Neighborhood Stabilization Program (NSP), first published in Part III Volume 73 #194 of the Federal Register (October 6, 2008). The City was also a sub-recipient in the Pima County NSP 2 Grant. These NSP funds were used to mitigate the impacts of the growing number of foreclosures during the housing market crash. In the first quarter of calendar year 2012, Tucson ranked 42nd in the nation among cities with high foreclosure rates, with 1 out of every 150 homes in Tucson in foreclosure proceedings. In total, the City acquired 117 foreclosed homes with NSP funds and made the necessary repairs to bring them into code compliance. NSP-acquired homes were either sold to qualified low-income buyers through the newly created Pima County Community Land Trust (PCCLT) or added to the City’s EI Portal rental housing inventory (40 rentals). Through the NSP program the City established a revolving loan fund. This fund will be used in future program years to continue the acquisition, rehabilitation, and re-sale of foreclosed properties to low-income buyers and add to the existing affordable rental property inventory. In FY 2015 the estimated expenditures for the NSP program income is \$1.4 million.

NSP Year	Grant Award	Owners/PCCLT	Renters – City EI Portal	Program Income Balance as of June 2013
NSP 1	\$7,286,911	37	21	\$2,829,635
NSP 2	\$4,789,590	24	12	Returned to Pima County
NSP 3	\$2,083,771	12	7	\$64,285

Homelessness and Special Needs Housing and Support Services

Based on Federal Census Statistics from 2011, Tucson was the sixth-poorest community in the country, with a poverty rate of 20.4%. The City of Tucson created a Commission on Poverty to focus on the following priorities:

- Job creation;
- Developing a HUD Coordinated Entry System to social services; and
- Developing self-sufficiency strategies for low-income Tucsonans.

The 2012 Poverty and Urban Stress Report can be found at the following website:
<http://cms3.tucsonaz.gov/files/hcd/PovReport2012final.pdf>

Consolidated Plan goals and strategies are integral to addressing the priorities established by the City’s Commission on Poverty, with ongoing investments in housing and assistance programs for homeless persons and non-homeless persons with special needs as described below.

Homeless Population

The City of Tucson is a member of the Tucson/Pima Collaboration to End Homelessness. TPCH is a coalition of community and faith-based organizations, government entities, businesses, and

individuals committed to the mission of ending homelessness and addressing the issues related to homelessness in Tucson and Pima County.

TPCH Goals:

- To act as advocates for the homeless.
- To provide leadership and serve as experts and advisors to local planning and funding bodies on issues that impact services to homeless persons.
- To increase community awareness and support for homeless people, homeless issues, TPCH and member organizations; and to support ongoing implementation of the City of Tucson/Pima County Plan to End Homelessness.

TPCH members coordinate to apply for competitive funding as advertised by HUD's notice of funding availability (NOFA) for resources to support the local Continuum of Care for the Homeless.

The City of Tucson has a goal of providing 30,000 units of service to homeless persons each year. In FY 2012 the 5-year goal of 150,000 units of service had already been reached and surpassed.

Services for homeless persons include:

- Case management;
- Bed nights;
- job placement/employment assistance; and
- Food and other crisis assistance

The Annual 'Point in Time' count in January 2013 counted 2,238 unduplicated persons who were homeless and staying in shelters, permanent housing or on the streets. Of these 2,238 people, 82% were adults and 18% were children.

According to the Homelessness in Arizona 2013 Annual Report for the time period between July 1, 2012 and June 30, 2013, 7,590 unduplicated individuals utilized homeless services at some point during the 12-month specified time period. These individuals were served by programs that enter information into the Homeless Management Information System (HMIS).

In addition, the 5-year Consolidated Plan includes the goal of adding 200 transitional and permanent supportive housing units to the existing inventory. In FY 2015 the Public Housing Authority (PHA) is adding a preference for homeless households limited to 10% of the PHA's portfolio of 1,506 total units and 10% of the PHA's voucher's (not including vouchers set aside for other special populations). The PHA may seek Human/Public Services Funds to hire an agency to provide case management and 'wrap around services' to help these families transition from living on the street to living in permanent housing.

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 and the TPCH Strategic Plan. In future program years with the update to the City of Tucson 5-year Consolidated Plan, bed nights, transitional housing and permanent housing units designated to serve homeless persons will be tracked using the HMIS system. The 2012 HMIS report on homelessness can be found at: http://www.tpch.net/uploads/1/4/0/0/14008364/homelessness_in_Tucson-pima_county_report_-_june_30_2012_final.pdf

Residents with Special Needs

Residents with special needs may require assistance with daily living based on a mental or physical disability or frailty due to age. In light of the increases in aging 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 residents with special needs include:

- Case management and support services;
- Home repair;

- Retrofitting interior spaces and the exterior of buildings for handicapped accessibility;
- Reverse mortgage counseling and loans;
- Transportation assistance; and
- Housing for persons living with serious mental illness and HIV/AIDS.

In FY 2013, the City met its annual goal, having served 8,070 individuals.

Community Development (non-housing needs)

The goals for the rehabilitation of public facilities were met and there are many projects currently in varying stages of completion. Demolition of structures 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.

2013 Project Tables – Historic Properties Rehabilitation Spot Blight (SB) and Low/Mod Area Benefit (LMA)						
Agency	Project	Funding Source	Total Project Budget/Funds Multi-year	Funds Expended FY 2014	Units	Status
City of Tucson/HCD Historic Preservation Office	Steinfeld Warehouse Exterior Rehabilitation Spot Blight (SB)	CDBG	\$993,168	\$113,442	1	Completed
City of Tucson/HCD Historic Preservation Office	Matus-Meza House Historic Rehabilitation(LMA)	CDBG	\$250,335	\$147,468	1	Completed
City of Tucson/HCD Historic Preservation Office	Rodeo Parade/Grounds Museum Repairs	CDBG	\$55,781	\$8,397	1	Completed
TOTAL CDBG:			\$1,299,284	\$269,306	3	3 Completed

FY 2014 projects underway include Oury Park Neighborhood Center restoration and repair, C.O. Brown House Façade repair and Sam Hughes Water Tower repair.

In FY 2014 the Tucson Mayor and Council adopted a CDBG Target Area. This area was identified in response to the Mayor and Council's observations following their review of the 2012 Poverty and Urban Stress Report. The target area consists of contiguous high-stress, low/mod income areas in the city core with documented low-income and high minority concentrations. The City will make investments to upgrade public facilities where there is a disproportionate need or a disparity in the

facilities available to serve the surrounding neighborhood. The goal is to direct funding into this area for several years to assist in the reduction of poverty and the comprehensive revitalization of the Target Area. See map on page 28.

Human/Public Services

Human/Public services address the needs of families and individuals who have difficulty maintaining a basic level of security. In FY 2013, a total of 33,631 persons were served with a combination of CDBG, ESG and General Funds. This number was 4,269 less than the stated 5-year Consolidated Plan goal of 37,900 people; in FY 2012 38,930 individuals were assisted.

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 13 projects administered by seven (7) agencies that comprise the Housing Rehabilitation Collaborative. \$2,182,711 is designated to provide housing rehabilitation services under the objective of Decent Housing with a primary outcome of Sustainability and a secondary outcome of Affordability. An additional \$1,245,999 for rental housing from the HOME program and \$75,000 CDBG for Habitat Preserve-a-Home will be used for housing rehabilitation. Eight (8) human service projects will be funded with CDBG funds in the amount of \$770,080 with the objective of providing a Suitable Living Environment with an outcome of increased Availability/Accessibility. An additional \$741,310 will be applied to projects that have the objective of Suitable Living Environment through public enhancements in low/mod areas, within the City of Tucson CDBG Target Area.

New Activities FY 2015

Economic Development

Page 83 of the City's FY 2010 – FY 2015 Consolidated Plan listed Economic Development Objectives as follows:

- Support economic development activities and employment, focusing on employment convenient to public transportation and working in partnership with workforce investment agencies;
- Develop a microbusiness loan program in cooperation with the Industrial Development Authorities (IDAs) to provide additional resources for small and growing business, focusing on the City of South Tucson and rural areas;
- Work cooperatively with workforce investment agencies, employers and nonprofit agencies to provide job training and employment services; and
- Incorporate training for contractors and other private sector entities to increase understanding of and participation in HUD programs, with emphasis on Section 3 and Labor Standards that promote economic self-sufficiency.

Microenterprise Assistance (570.201(o))

During February of 2014, The City of Tucson published an RFP for Microenterprise proposals from eligible non-profit agencies. Projects that were considered provided an acceptable combination of technical assistance and training for existing or start-up microenterprises. Proposed services may include: classroom instruction, personal development workshops and

individual technical assistance sessions to develop business plans. The City of Tucson is committing \$75,000 to microenterprise activities.

To meet CDBG program eligibility guidelines, microenterprises are defined as businesses with five or fewer employees either owned by a low/moderate income individual or willing to create jobs for low/moderate income persons. 'Persons developing microenterprises' means such persons who have expressed interest and who are, or, after an initial screening process are expected to be, actively working toward developing businesses, each of which is expected to be a microenterprise at the time it is formed.

This allocation of resources supports the goals established in the Consolidated Plan and addresses the following economic development policies contained in the November 13, 2013 voter-adopted General Plan:

- Support and expand entrepreneurship through partnerships, technical assistance, and incentives (JW4)
- Provide assistance and incentives to encourage entrepreneurial efforts and technological innovations that lead to local business development and expansion (BC4)

Section 108 Program (24 CFR 570, Subpart M, Loan Guarantees)

The Section 108 program provides communities with a means of leveraging their CDBG funds to obtain additional financing resources for economic development, public facilities, large scale physical development projects and housing rehabilitation. Types of eligible activities for Section 108 financing include:

- Economic development activities that meet CDBG eligibility requirements;
- Acquisition of real property;
- Rehabilitation of publicly owned real property;
- Housing rehabilitation that meet CDBG eligibility requirements;
- Construction, reconstruction, or installation of public facilities (including streets, sidewalks and other site improvements);
- Related relocation, clearance, and site improvements;
- Payment of interest on the guaranteed loan and issuance costs of public offerings;
- Debt service reserves;
- Public works and site improvements in colonias; and
- In limited circumstances, housing construction as a part of community economic development.

The City of Tucson's request for a \$20 million loan guarantee pool, under Section 108 of the Housing and Community Development Act of 1974 was approved by HUD on March 7, 2012. The City continues to market the Section 108 program to organizations seeking gap financing for loans of between \$2 million and \$10 million. See:

<http://finance.tucsonaz.gov/business/business-incentives-and-assistance-programs>

On February 10, 2014, HUD issued authorization for the City to proceed with the Department of Transportation Americans with Disabilities (ADA) Sidewalks & Curbs Project' in the amount of \$1,769,000. This infrastructure project will permit the installation of ADA improvements in concert with street projects funded through local Proposition 409 funds. The loan will be repaid over an 18 year term, and the City will initially use its annual CDBG allocation to make loan repayments. It is See: <http://www.tucsonaz.gov/hcd/whats-new>

The following table summarizes the proposed objectives and outcomes for FY 2015.

Activity	Amount	Objective	Primary Outcome
Public/Human/Public Services	\$770,080	Suitable Living Environment	Sustainability
Housing Rehabilitation Collaborative	\$2,182,711	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	\$1,161,310	Suitable Living Environment	Availability Accessibility
Administrative funds, to include Planning	\$1,022,775	Suitable Living Environment	Sustainability
Economic Development/ Microenterprise	\$75,000	Economic Opportunity	Sustainability

* From FY 2014

The projects table at the end of this report identifies the individual projects and agencies that will assist in carrying out the City FY 2015 Annual Action Plan 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 5 Action Plan General Questions Response:

GEOGRAPHIC AREAS OF THE JURISDICTION

Tucson is the second largest city in Arizona, consisting of approximately 227 square miles and is the central city of the metropolitan area. New residents come to Tucson from all over the United States and 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.

Tucson follows national trends: the average age of the population of the United States and in Tucson is growing older; the number of traditional families is declining and working mothers are more commonplace. Tucson is also unique in that 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 21. There is a higher proportion of people 65 years and older, Tucsonans move more frequently, and are more likely to rent housing than most residents of the United States.

Trends in Poverty

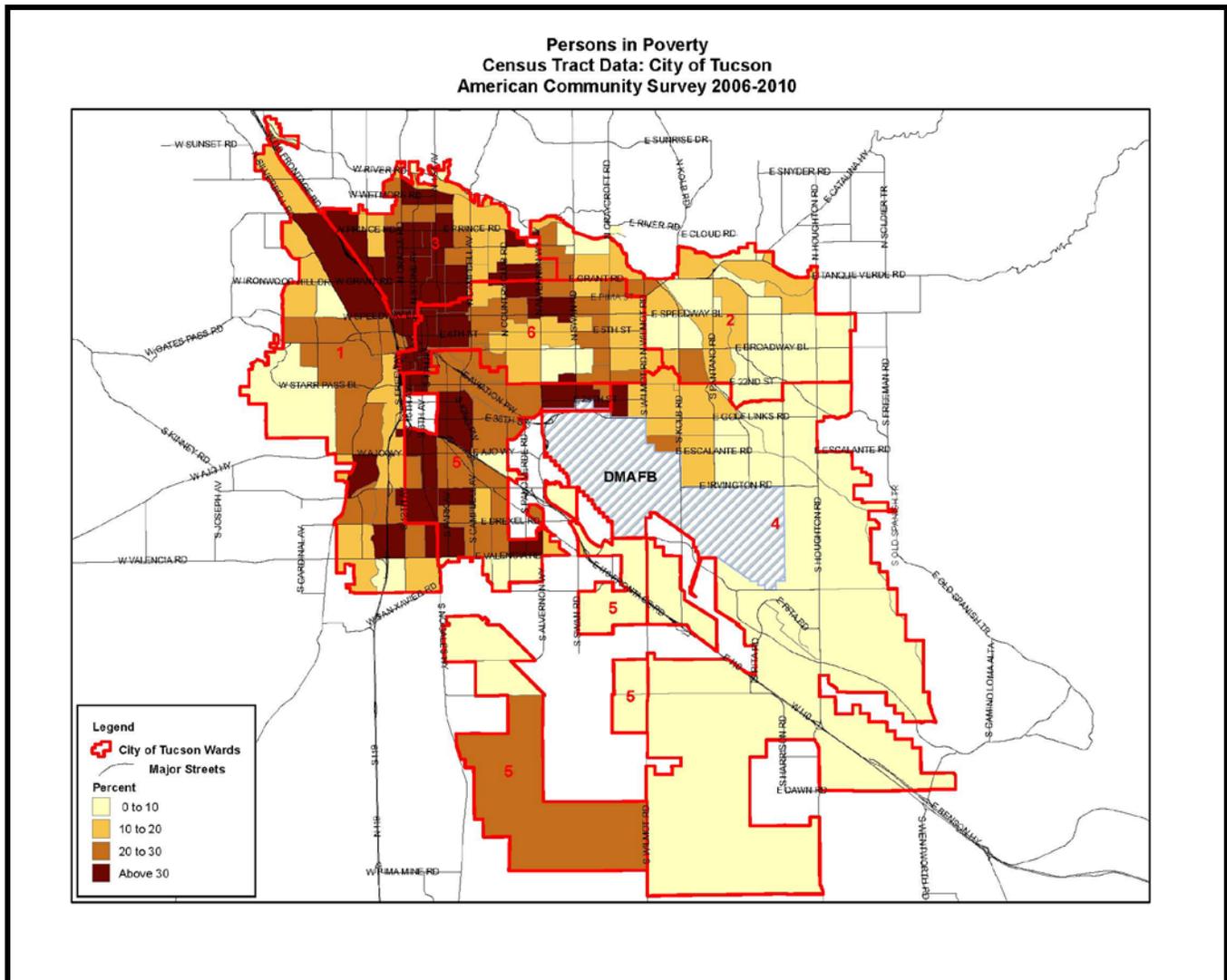
Poverty rates and the number of people in poverty are an important means of measuring a community's well-being. The most recent American Community Survey (ACS) report on poverty providing 2011 data ranks the Tucson Metro area as the sixth-poorest large metropolitan area in the nation with an overall poverty rate of 20.4%. In 2000, Tucson's poverty rate was high at 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 at the following website:

<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%

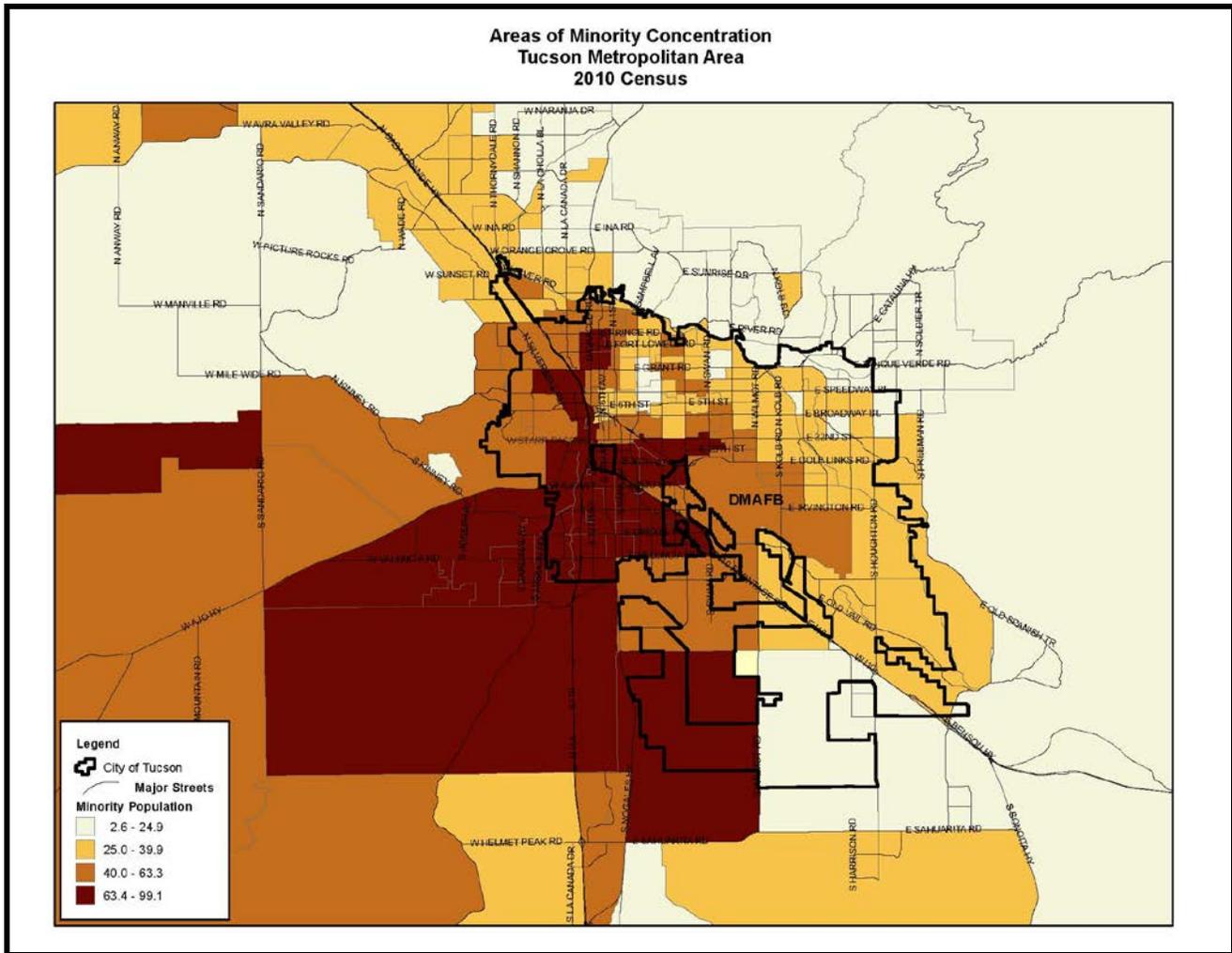
Source: Census 2000; American Community Survey 2009-2011 3-yr estimate

Persons in Poverty

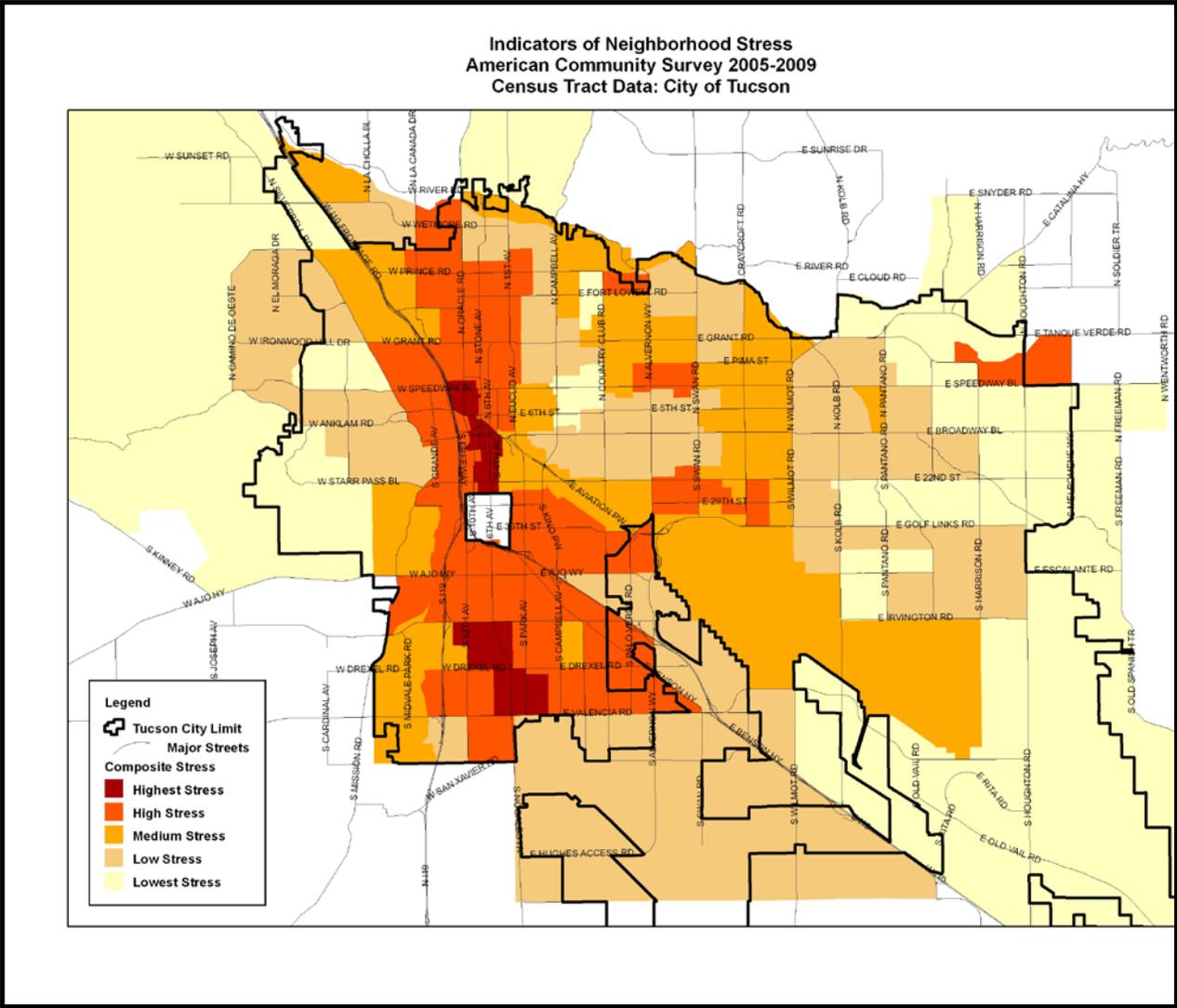


Areas of Minority Concentration

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 described as a 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 now 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.



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 the following ways to ensure investment in areas of minority concentration:

- Funds allocated to the Housing Rehabilitation Collaborative are distributed to agencies that provide services on a city wide basis.
- Human/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.
- 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 the previous program year 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 for public facilities projects. As a result, in the FY 2015 Annual Action Plan, staff is proposing a target area as a focus for certain CDBG funds consisting of contiguous high-stress, low/moderate income areas in the city core with documented low-income and high minority concentrations. The City will make investments to upgrade public facilities where there is a disproportionate need or a disparity in the facilities available to serve the surrounding neighborhood. The goal is to direct funding into this area for several years to assist in the reduction of poverty and comprehensive revitalization of the Target Area.

Meeting the Needs of the Underserved

Tucson strives to meet the underserved needs of the community. This is accomplished through programs and services provided to homeowners, renters, and persons who are homeless, with limited resources and income. Agencies are required to use current income limits in determining client eligibility. Income limits are revised by the Department of Housing and Urban Development (HUD) periodically; agencies are advised to check the HUD web site regularly at: <http://www.huduser.org/> for updates.

2014 HUD Income Guidelines for Tucson and Pima County are as follows:

2014 Annual Income	1 person	2 person	3 person	4 person	5 person	6 person	7 person	8 person
80% of area median	\$31,950	\$36,500	\$41,050	\$45,600	\$49,250	\$52,900	\$56,550	\$60,200
50% of area median	\$19,950	\$22,800	\$25,650	\$28,500	\$30,800	\$33,100	\$35,350	\$37,650
30% of area median	\$12,000	\$13,700	\$15,400	\$17,100	\$18,500	\$19,850	\$21,250	\$22,600

Homeowners

The Tucson Housing Rehabilitation Collaborative works toward meeting the following goals:

- Incorporation of home maintenance education and preventive care in housing rehabilitation programs;
- Streamlining 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.

TUCSON 'HOUSING REHABILITATION COLLABORATIVE'

In February of 2000, the Mayor and Council directed the nine-member network of agencies to address, in a collaborative fashion, the issue of deferred maintenance for low- and moderate-income homeowners. Representing all of the local agencies involved in housing rehabilitation, the Tucson Housing Rehabilitation Collaborative (HRC) begins its 15th year as a productive and responsive body of housing professionals. The HRC consists of the following agencies: Chicanos Por La Causa (CPLC), City of Tucson Housing & Community Development Department (HCD), Community Home Repair Projects/Arizona (CHRP), Direct Center for Independence (DIRECT), Old Pueblo Community Services (OPCS), Pima Council On Aging (PCOA), Rebuilding Together Tucson (RTT), Tucson Metropolitan Ministries Family Services (TMM), and the Tucson Urban League (TUL). With shared access to a central database, the HRC is able to monitor the broad delivery of services to eligible households, enabling the partners to efficiently and fairly expend the annual allocation of \$2 million in CDBG funds. Because one or more of the agencies maintain a 'rapid response' capacity, the HRC is able to respond with emergency home repair services. As part of its contribution to the HRC, the City of Tucson maintains a housing rehabilitation staff that is certified by the Environmental Protection Agency (EPA) in environmental disciplines such as Lead Inspector, Risk Assessor, and Lead Supervisor, a capacity that is shared by all other members. While the entire City of Tucson is covered by the Collaborative, an extra effort has been made since 2007 to provide related services to those eligible homes in neighborhoods that in and around the Downtown Revitalization District.

Renters

Through an Intergovernmental Agreement (IGA) the City of Tucson's Public Housing Authority (PHA) coordinates the Section 8 Housing Choice Voucher (HCV) Program for both the City of Tucson and Pima County. 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. In FY 2015, the City of Tucson PHA will provide 4,565 Housing Choice Vouchers for Tucson families and an additional 877 for Pima County residents. These figures include several specialty programs for specific populations and represent a reduction of 8% from FY 2014. During the past year, funding challenges for the HCV program were addressed by reducing the subsidy standard, resulting in a \$30 reduction per month per unit Housing Assistance Payment (HAP) from FY 2013 to FY 2014. The PHA absorbed the pro-rated reduction in administration fees by reducing the size of the PHA staff and instituting more efficient work practices. These actions have effectively reduced the previous standards for customer service and limited the PHA's ability to sustain assistance to its clients and their families at the preferred level.

Public Housing

The City of Tucson will provide 1,506 public housing units in FY 2015. 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 individuals that are homeless include: Low-Income Housing Tax Credits (LIHTC), HOME-funded Rental Housing Partnership, Vacant and Neglected Structures (VANS) El Portal, Shelter Plus Care, HOPWA, Positive Housing Opportunities, Pathways Supportive Housing and the Bridges Supportive Housing program, see pages 46 through 49 for a description of the HOME program.

In addition, the 5-year consolidated plan includes the goal of adding 200 transitional and permanent supportive housing units to the existing inventory. In FY 2015 the PHA is adding a preference for homeless households limited to 10% of the PHA's total portfolio of 1506 units and 10% of the PHA's vouchers (except for those vouchers already designated for a special population). The PHA may seek Human/Public Services Funds to hire an agency to provide case management and wrap around services to assist these families in transitioning from living on the street to living in permanent 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 are 45% more likely to demonstrate 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 for 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 testing has been completed, a City of Tucson, EPA-certified Lead Supervisor tests the property and if all hazards are eliminated, can confirm 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 tests and eliminates existing hazards in 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 and 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 detected.

In FY 2015, funds will be allocated for the Housing Rehabilitation Collaborative (HRC) Environmental Resources and Compliance Project. Part of the funding will be used to train staff from non-profit organizations 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 (CPLC), DIRECT Center for Independence, Community Home Repair Projects of Arizona (CHRPC), Tucson Urban League (TUL), TMM Family Services, Pima Council on Aging (PCOA) 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 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 mixed 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 Affordability Index now includes Pima County data.

The City of Tucson State-mandated 10-year General Plan, (Plan Tucson) was updated and adopted by Tucson voters in November 2013, (Resolution #22160 Proposition 402) 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. Plan Tucson Goals and policies that are specific to transportation and mobility include:

Goal 25 – An urban form that conserves natural resources, improves and builds on existing public infrastructure and facilities, and provides an interconnected multi-modal transportation system to enhance the mobility of people and goods.

Policy LT2 – Participate in efforts to develop a coordinated regional, multi-modal transportation system that improves the efficiency, safety, and reliability of transporting people and goods within the region and to destinations outside of the region.

The entire Plan is posted on line at www.tucsonaz.gov/plantucson.

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. This study will be completed within FY 2015.

Federal, State and Local Resources

In addition to the funds noted in this document, an estimated \$56.9 million in federal, state and local resources will help address the needs identified in the plan. The projected budget, which is not finalized, includes: (**Figures from proposed FY 2015 HCD budget.**)

- \$39.8 million - Housing Choice Voucher Program
- \$13.1 million - Public Housing Program
- \$ 1.1 million - Lead Hazard Control Program (LHC)
- \$ 1.4 million - Neighborhood Stabilization Program (NSP)
- \$ 1,464,910 - City of Tucson General Funds for Public Human/Public Services (Contingent on City of Tucson Final Budget amount.)

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 5 Action Plan Managing the Process response:

The City of Tucson Housing and Community Development (HCD) Department is responsible for overseeing the development of the Annual Action Plan and for the administration of CDBG, ESG and HOME funds. The Southern Arizona AIDS Foundation (SAAF) administers programs funded by HOPWA. HCD is the local Public Housing Authority and the lead agency in the City of Tucson and Pima County Consortium. HCD collaborates with the Tucson Housing Rehabilitation Collaborative, Tucson Pima Collaboration to End Homelessness (TPCH), Pima County, Pima Association of Governments (PAG) Committees, Pima Council on Aging (PCOA), Community Housing Development organizations (CHDO's) as well as many non-profit agencies delivering services in developing needs and priorities for funding and services. The City of Tucson/Pima county FY 2010-FY 2015 Consolidated Plan remains the key guiding document for funding and goal setting. During FY 2015 the City will begin preparing an updated Consolidated Plan document for the 5-year period beginning July 1, 2015 through June 30, 2020. The goals and policies in the voter adopted General Plan (Plan Tucson) will be integrated with the Consolidated Plan.

HCD staff is directly involved in committees and sub-committees of local organizations and collaboratives providing services to locally identified service populations. Through staff's work on these committees and internal information exchanges, the Department monitors emerging issues and changing needs for programs and services within the community.

The City of Tucson has numerous Boards and Commissions that act in an advisory capacity and/or make recommendations on policies, programs and projects related to goals in the Consolidated Plan. For a complete list of City of Tucson Boards and Commissions see: <http://www.tucsonaz.gov/clerks/boardscommissions>

During FY 2015 the City will begin preparing an updated Consolidated Plan document for the 5-year period beginning July 1, 2015 through June 30, 2020. The goals and policies in the voter adopted General Plan, Plan Tucson, will be integrated with the FY 2016 – FY 2021 Consolidated Plan. See: <http://cms3.tucsonaz.gov/plantucson>

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 5 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 outlined. 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 (HCD) is responsible for overseeing the development of the Annual Action Plan. The City's Citizen Participation Plan was followed in preparing the Annual Action Plan. The Annual Action Plan was made available to the public for a 30-day review period beginning April 4, 2014 through May 3, 2014. The City of Tucson and Pima County held two joint public meetings, presenting the FY 2015 Annual Action Plans for the respective jurisdictions.

April 10, 2014, with 1 member of the public in attendance
City of Tucson Housing and Community Development Offices
320 North Commerce Park Loop, Tucson, Arizona

April 22, 2014, with 5 members of the public in attendance
Ellie Towne Center
1660 W. Ruthrauff Road
Tucson, Arizona

A final public hearing will be held by the Mayor and Council on May 6, 2014. HCD staff undertook a comprehensive outreach approach for the public meeting, including direct mailings and notices in the local newspaper.

Public Comments received and responses provided:

Submitted at the public meetings -4

By email - 2

By Mail – None

In Person – None

See Appendix B for meeting notice, list of attendees and public comments and responses.

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 5 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 (The HOME program monitoring schedule is located on page43.) Tucson's strong commitment to the monitoring of local partnering agencies has resulted in stronger relationships, minimization of errors, and better product and service delivery throughout the community. Of particular note is Tucson's pre-contract audit requirement, whereby City staff reviews 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 awarding 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 sub-recipient 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.

City staff holds an eligibility-training class on an annual basis for all funded agencies that manage low-income HOME rental units. The class is mandatory for all CHDO's that receive CHDO Operating Funds. Income eligibility requirements in accordance with Section 8 guidelines, and an explanation of the documents that must be maintained in the eligibility file is provided.

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. Those with the highest number of risk factors will be designated as a priority. Those sub-recipients whose risk assessment is low (0 to 1 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 the required monitoring. 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 the progress of 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 meetings as needed. The Consolidated Annual Performance and Evaluation Report (CAPER), is reviewed to ensure that needs are being met and the stated 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 5 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 that may be present in structures. 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. The City requires compliance from its contractors and subcontractors involved in rehabilitation projects.

In FY 2015 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 about 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 5 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 homeless.

Homeowners

In FY 2015, The Housing Rehabilitation Collaborative will provide assistance to 447 households through its various housing rehab programs.

Renters

Housing Choice Voucher Program - In FY 2015, the City of Tucson will provide 4565 vouchers for City of Tucson applicants and an additional 877 for applicants living in Pima County. These figures include several specialty programs for specific populations. .

Public Housing – The City of Tucson will provide 1,506 public housing units in FY 2015. Applicants must be below 50% AMI to qualify. At least 40% of new admissions must be below 30% AMI. In FY 2015 the PHA is adding a preference for homeless households limited to 10% of the PHA's total portfolio of 1506 units and 10% of the PHA's vouchers (except for vouchers designated for other special populations). The PHA may seek Human/Public Services Funds to hire an agency to provide case management and wrap around services to assist these families in transitioning from living on the street to living in permanent housing.

HUD's Capital Needs Assessment (CNA), completed in 2010, estimated that there is a backlog of unmet need Capital Need in the amount of 26 billion dollars nation-wide. The Capital Fund received by the PHA's has been drastically reduced by 40% over the past 15 years. Therefore, in order to preserve Public Housing the PHA may have to utilize CPD funds to help bridge this gap.

July 1, 2014 PHA Plan

2. Financial Resources continued

Financial Resources: Planned Sources and Uses		
Sources	Planned \$	Planned Uses
1. Federal Grants (FY 2014 grants)		
a) Public Housing Operating Fund	4,633,500	
b) Public Housing Capital Fund	1,074,840	
c) HOPE VI Revitalization		
d) HOPE VI Demolition		
e) Annual Contributions for Section 8 Tenant-Based Assistance	33,876,580	
f) Resident Opportunity and Self-Sufficiency Grants	18,180	
g) Community Development Block Grant	30,080	Public Housing Supportive Services
Other Federal Grants (list below) Misc. Capacity		
Housing Opportunities for People with Aids	36,490	Section 8 Other
Positive Housing Opportunities	150,010	Section 8 Other
Family Self Sufficiency Coordinator Grant	69,000	Section 8 Supportive Services
Family Unification Program	1,050,950	Section 8 Other
Veteran's Affairs Supportive Housing	3,749,320	Section 8 Other
Mainstream Program Vouchers	358,130	Section 8 Other
Non-Elderly Disabled Vouchers	178,310	Section 8 Other
Multifamily Operating	208,200	Section 8 Other
2. Prior Year Federal Grants (unobligated funds only) (list below)		
Public Housing Capital Fund	499,140	Public Housing Capital Improvements
Family Self Sufficiency Coordinator Grant	69,040	Section 8 Supportive Services
Resident Opportunity and Self Sufficiency Grant	128,500	Public Housing Supportive Services
Positive Housing Opportunities	22,160	Section 8 Other
Housing Opportunities for People with Aids	306,290	Section 8 Other
3. Public Housing Dwelling Rental Income		
	3,396,740	Public Housing Operations
4. Other income (list below)		
Multifamily Tenant Income	91,170	Multifamily Housing
5. Non-federal sources (list below)		
Arizona Department of Health Services/Arizona Department of Housing Bridge Subsidy Program	453,890	Section 8 Other
Central Office Cost Center Fees/Other Rents	2,004,440	Public Housing Operations
Central Office Cost Center Fees/Section 8	1,328,110	
Non-ACC Rental Tenant Income	748,730	Affordable Housing
Development Program Income	250,000	Affordable Housing
Total resources	54,731,800	

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 5 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 educate them about 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.

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 apartment complexes and single family homes, duplexes, and triplexes scattered throughout the city.

ROSS Program

The HUD Resident Opportunities and Self-Sufficiency (ROSS) grants have been funded in the amount of \$375,000 each during the past several years to serve our Public Housing elderly/disabled residents. HCD is now the recipient of the ROSS grants beginning June 23, 2014 through June 20, 2017 and will continue to act as Contract Administrator, overseeing activity on these grants. Each grant has an initial term of three years. ROSS grants provide services that assist residents in maintaining physical and mental health, good nutrition, fitness, and socialization. Residents learn ways to manage chronic disease, navigate the health care system, and find resources in the community. Group transportation to shopping, cultural and community events, parks and outdoor activities, health fairs, and health screenings are also provided through the ROSS grants. These services enable many residents to continue living independently and 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 5 Action Plan Barriers to Affordable Housing response:

The following are actions the City will take in FY 2015 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) by providing 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 homes constructed by private sector developers.

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. Assistance is provided to consumers in the event they have 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 and completed on behalf of the consortium. The Fair Housing Plan and Analysis of Impediments (AI) to Fair Housing is in the process of being updated based on new federal guidelines and planning opportunities.

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 in meeting 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 practices. The City will strive to achieve these goals by continuing to fund and work closely with the Southwest Fair Housing Council, continue to improve its efforts to affirmatively further fair housing by using the AI as a cornerstone of housing and community development

planning, and 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, help formulate next year's fair housing action plan and will be incorporated into the new planning documents.

FUNDS COMMITTED TO FAIR HOUSING ACTIVITY

AGENCY	CITY FUNDING Planning and Services
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.

Program Year 5 Action Plan HOME/ADDI response:

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, 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.

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 agency with the HOME entitlement 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 of Tucson 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, the City of Tucson/Pima County 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.

In FY 2015, the City will designate and/or re-certify CHDO status on a per project basis and will no longer provide CHDO operating funds.

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, 2014 through June 30, 2015. As part of the Annual Plan, this program description is submitted to HUD for approval.

HUD FY 2015 HOME Allocation

The total HOME funds allocated to the City of Tucson and Pima County for FY 2015 is \$2,625,360. These funds are allocated as follows: 10% for Administration, 15% for CHDOs (projects only), and 75% 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	\$2,625,360	\$735,101	\$1,890,259
Administration	\$262,536	\$65,634	\$196,902
CHDO Projects	\$393,804	\$110,265	\$283,539
Projects	\$1,969,050	\$559,202	\$1,409,818

City Projects	
Rehabilitation (deferred Loan)	0
TBRA	\$20,000
Rental	\$1,245,999
Homeownership	\$143,819
Total	\$1,409,818

County Projects	
Homeownership: down payment assistance, development & preservation	\$100,000
Rental Development & Preservation	\$459,202
Total	\$559,202

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: \$393,804 for projects

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 Esperanzas 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 an annual personal monitoring visit to the project.

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 (MBE) and woman-owned business enterprises (WBE).

The following remedies are employed by the City of Tucson to address marketplace discrimination against MBE and WBE businesses:

- Consultation with new or developing businesses;
- Certification of minority and women-owned businesses;
- Publication and distribution of a MBE/WBE Directory;
- Notification to 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;
- Developing and holding 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; and
- Monitoring purchasing efforts to ensure MBE/WBE access to the process

The City encourages minority participation 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.

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.**
- 4. Homelessness Prevention—The jurisdiction must describe its planned action steps over the next year to address the individual and families with children at imminent risk of becoming homeless.**
- 5. Discharge Coordination Policy—Explain planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how, in the coming year, the community will move toward such a policy.**

Program Year 5 Action Plan Homeless Services response:**Plan for Investment and Use of Available Funds**

The Continuum of Care expects to receive approximately \$8,905,039 from public and private sources with 100% of the funds intended to address the needs of persons who are experiencing homelessness. Of the approximate \$8.9 million provided by HUD, 60% is dedicated to the development and ongoing operation of permanent supportive housing for homeless persons with disabilities. The remaining 40% is dedicated to a variety of transitional housing programs for homeless persons that include supportive and employment services.

During FY 2015, the City plans to spend \$677,574 in federal CDBG and ESG funds on programs for persons who are homeless serving seven (7) agencies. Specific projects being supported during FY 2015 are listed below. The goals of these projects are to prevent homelessness and assist individuals and families in finding permanent housing and regaining self-sufficiency.

Projects that Serve the Homeless This section will be filled in for the FINAL Annual Action Plan.

Agency	Project	Emergency Shelter Support	Homeless Prevention	Rapid Re-housing	Street Out reach	HMIS	CDBG
Chicanos Por La Causa	Emergency Assistance		\$45,000				
Emerge! Center Against Domestic Abuse	Rapid Re-housing for Survivors of Domestic Abuse	\$30,000		\$85,000			
Our Family Services, Inc	New Beginnings Homeless Prevention Program		\$45,000	\$40,000	\$30,000		\$60,000 Emergency Shelter
Our Family Services, Inc.	Rapid Rehousing	\$30,000					
Primavera Foundation	Emergency Family Shelter	\$34,458					\$50,000 Women's Services \$102,580 Emergency Services
Pima County	HMIS					\$5,000	
City of Tucson	Obtaining ID for homeless people to receive services				\$52,607		
Youth on Their Own	Special Needs						\$40,000
Total Projects		\$94,458	\$90,000	\$125,000	\$82,607	\$5,000	\$252,580

HOMELESSNESS

The FY 2010- FY 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 to existing housing inventory (40 units/year)

For Fiscal Year 2015, the City of Tucson plans to use CDBG and ESG money to fund a variety of non-profit agencies to provide services to persons experiencing homelessness, those at risk of being homeless and homeless families 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;
- Institute preventions strategies for rent, utility and mortgage assistance and debt and mortgage counseling;
- Provide short-term assistance in the form of emergency shelters and motel vouchers;

-
- Provide 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; and
 - Continued implementation of the TPCH Strategic Plan.

USE OF AVAILABLE RESOURCES

During Fiscal Year 2015 the City will receive the following funds:

Community Development Block Grant (CDBG): \$5,133,873

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

HOME Investment Partnerships Program (HOME): \$2,625,360

HOME funds, leveraged with local general funds and program income of approximately \$600,000 (\$300,000 PI, \$327,460 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): \$424,994

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.

Housing Opportunities for Persons with AIDS (HOPWA): \$453,063

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

The Tucson/Pima Collaboration to End Homelessness (TPCH) is a coalition of community and faith-based organizations, government entities, businesses, and individuals committed to the mission of ending homelessness and addressing the issues related to homelessness in Tucson and Pima County.

TPCH Goals:

- To act as advocates for the homeless.
- To provide leadership and serve as experts and advisors to local planning and funding bodies on issues that impact services to homeless persons.
- To increase community awareness and support for homeless people, homeless issues, TPCH and member organizations; and to support ongoing implementation of the City of Tucson/Pima County Plan to End Homelessness.

TPCH members coordinate to apply for competitive funding for the following, as advertised by HUDs notice of funding availability (NOFA) for resources to support the Continuum of Care for the Homeless.

Supportive Housing Program (SHP): \$849,630 (For the City of Tucson)

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.

Shelter Plus Care: \$883,363

The Shelter Plus Care Partnership grant provides 100 units of permanent supportive housing for the homeless and families with disabilities (primarily persons who are seriously mentally ill; have chronic problems with alcohol, drugs, or both; and/or are HIV positive or have other related diseases). The Shelter Plus Care III and Shelter Plus Care IV grants have been consolidated into one grant named Shelter Plus Care IV. The consolidated grant provides 81 units of permanent supportive housing for homeless individuals and families with disabilities (serious mental illness, physical disabilities, and/or chronic substance abuse problems).

Bridges: \$657,190

The Bridges transitional housing program 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 and chronically homeless individuals with multiple barriers to employment. Although not specifically targeted, the project will serve veterans and victims of domestic violence. In addition, Pathways provides 16 units of permanent supportive housing to homeless and chronically homeless disabled individuals and families.

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 the homeless ;
- 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;
 - The disabled population is made to wait long amounts of time 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; and
 - Difficulty in locating projects in existing neighborhoods due to 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 include the following:

- 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; and
- 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 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 clients (80%) 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 and was able to house 50 vets and 20 additional family members. Staff assists in housing veterans through programs designed specifically 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 from Davis-Monthan Air Force Base that included furniture in two dormitory buildings scheduled for demolition, bedroom furniture from Best Western Inn & Suites, and the Airport Doubletree Hotel. All of these items were picked up, sorted, and stored by City staff and volunteers until distributed to clients. All clients housed received furniture, kitchen and bathroom items, linens, personal care items, cleaning supplies, and non-perishable 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 food stamps, job training and placement, and guardianship/representative payee. In addition, prevention programs include supportive education regarding 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 of homeless shelters.

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 to men and women recently released from the Department of Corrections facilities and reentering the community after 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, human/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 5 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/Public Services and built environment needs of the City of Tucson.

Public/Human/Public Services

The City of Tucson invests the maximum percentage of resources (15% of CDBG funding) in Human/Public 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/Public Services agencies and programs, the City of Tucson's goal is to provide public service assistance to 37,000 individuals during the period covered by this action plan.

Built Environment

For several decades, the focus has been on the necessity of 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.

CDBG Target Area

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 the previous program year in response to the Mayor and Council's observations following their review of the Poverty and Urban Stress Report. The target area consists of contiguous high-stress, low/mod income areas in the city core with documented low-income and high minority concentrations. The City will make investments to upgrade public facilities where there is a disproportionate need or a disparity in the facilities available to serve the surrounding neighborhood. The goal is to direct funding into this area for several years to assist in the reduction of poverty and comprehensive revitalization of the Target Area.

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 5 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 5 Action Plan Non-Homeless Special Needs 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 38 existing housing units to improve accessibility
- Rehab and restore 87 existing housing units for elderly homeowners
- Add 447 permanent, supportive housing units to the existing stock

Human/Public 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/Public Services for: (the estimates below are based on FY 2014 goals)

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

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 5 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 \$453,063 is available for programs that provide housing opportunities to people with AIDS. The City will contract with Southern Arizona AIDS Foundation (SAAF) for \$ 439,471 (includes \$36,490 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

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 524(CAPER) people living with HIV/AIDS in FY 2012-2013. 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 5

The range/type of housing activities for FY 2015 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 to 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 5 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 Annual Action Plan information that was not covered by a narrative in any other section.

FY 2015 Annual Action Plan Project Allocations and General Fund Requests are as follows:

	AGENCY NAME	PROJECT NAME		
HUMAN/PUBLIC SERVICES			SERVICE AREA	CDBG AMOUNT Requested
1	COT/Housing Management Division	Family Self-sufficiency	Public Assistance	\$18,000
2	Primavera Foundation, Inc.	Primavera Women's Services	Crisis Assistance	\$50,000
3	Community Food Bank of Southern Arizona	The Temporary Emergency Food Assistance Program (TEFAP)	Crisis Assistance	\$190,000
6	Pima Council on Aging/Elderly Independence w/CHRPAs	Case management	Public Assistance	\$30,500
7	Tucson Centers for Women and Children dba Emerge! Center Against Domestic Abuse	Crisis Assistance for Survivors of Domestic Violence	Crisis Assistance	\$190,000
13	Primavera Foundation, Inc.	Emergency Services	Crisis Assistance	\$102,580
18	Southern Arizona Children's Advocacy Center	Investigative/Intervention Services for Child Abuse Victims	Crisis Assistance	\$80,000
9	Our Family Services, Inc.	New Beginnings Emergency Shelter Services	Crisis Assistance	\$60,000
19	United Way	Income Tax Preparation	Public Services	\$9,000
21	Youth on Their Own	Special Needs Program	Crisis Assistance	\$40,000
			Total	\$770,080

Crisis Assistance

	AGENCY NAME	PROJECT NAME		
HOUSING REHAB COLLABORATIVE				CDBG AMOUNT
24	HRC/COT/HCD/PCSD	City Neigh & Initiatives		\$417,000
25	HRC/COT/HCD/PCSD	Emergency Home Repair		\$500,000
26	HRC/COT/HCD/PCSD	HRC Environmental Compliance		\$180,000
36	HRC/COT/HCD/PCSD	Lead Based Paint Hazard Program Match		\$83,000

27	HRC/PCOA	Elderly Home Repair Program		\$87,777
28	HRC/CPLC	Roof Replacement		\$129,989
29	HRC/DIRECT	Home Access Program		\$137,189
30	HRC/CHSPA	City CDBG Emergency		\$171,389
32	HRC/Tucson Urban League	Emergency Home Repair		\$195,689
33	HRC/Tucson Urban League	Housing Rehab South Park		\$70,200
34	HRC/TMM	Midtown Homeownership Program		\$107,489
35	HRC/Old Pueblo Community Services	Sustainable Rehab		\$102,989
			Total	\$2,182,711

NEIGHBORHOOD ENHANCEMENT / TARGET AREA PROJECTS COMMUNITY DEVELOPMENT			CDBG AMOUNT
15	City of Tucson / HCD/TDOT	Section 108 Loan Repayment (Year 1 of 18)	\$120,000
39	City of Tucson / HCD	Target Area Development-Public Facilities	\$741,310
40	Habitat for Humanity	Target Area: Preserve-A-Home Program (Housing)	\$75,000
41	City of Tucson	Safe, Green & Healthy Facilities (Year 2 of 5)	\$150,000
		Total	\$1,086,306

AGENCY NAME	PROJECT NAME	ADMIN FUNDS
ADMINISTRATION & PLANNING		
43	City of Tucson/ HCD Administration	\$947,775
PLANNING		
42	Tucson/Pima Collaboration to end Homelessness	Planning for the Continuum of Care \$25,000
PLANNING - FAIR HOUSING ACTIVITIES		
22	Southwest Fair Housing Council	Fair Housing Activities \$25,000
23	Southwest Fair Housing Council	Don't Borrow Trouble \$25,000
43 *	All entitlements	Total Admin. Funds \$1,919,169
		Total CDBG \$1,022,775

ECONOMIC DEVELOPMENT /MICROENTERPRSE			CDBG AMOUNT
17	Microbusiness Advancement Center	MAC's Microenterprise Expansion Project	\$75,000
			\$75,000

SECTION 108 PROGRAM			CDBG AMOUNT
	City of Tucson / HCD/TDOT	ADA Curbs & Sidewalks Project (See project 15)	\$1,769,000

AGENCY NAME	PROJECT NAME	ESG AMOUNT	
EMERGENCY SOLUTIONS GRANT (ESG)		ESG AMOUNT	
11	Chicanos Por La Causa	Emergency Assistance to prevent homelessness	\$45,000
4	TCWC/Emerge! Center Against Domestic Abuse	Rapid Rehousing for Survivors of Domestic Abuse	\$85,000
5	TCWC/Emerge! Center Against Domestic Abuse	Domestic Abuse Services	\$30,000
8	Our Family Services, Inc.	New Beginnings Homeless Prevention Program	\$45,000
20	Our Family Services, Inc.	HYS Street Outreach	\$30,000
10	Our Family Services, Inc.	Rapid Rehousing	\$40,000
14	Primavera Foundation	Greyhound/Emergency Family Shelter	\$34,458
12	Pima County	Homeless Management Information System	\$5,000
31	City of Tucson	ESG Pilot Project	\$52,000
43*	City of Tucson	Administration	\$27,929
		Total ESG	\$424,994

HUMAN/PUBLIC SERVICES			HOPWA AMOUNT
1	Southern Arizona AIDS Foundation	HOPWA funds	\$439,471
1	City of Tucson	HOPWA funds (Admin)	\$13,592
		Subtotal	\$453,063

Additional Human/Public Services Funding Requested – Contingent on final FY 2015 City Allocations of General Funds

In addition to the above funding listed in this Annual Plan, the City of Tucson received \$2,683,690 in requests for General Funds to assist low and moderate income individuals and families. The City is in the process of preparing the City's overall Budget for FY 2015, therefore commitments that could be made using General Funds are unknown. Based on previous years, an RFP process was held in the spring to determine how General Funds could be distributed. Agencies that applied for this funding were notified that General Funds may be reduced or eliminated as a funding source for

Human/Public Services programs. Based on the results of the RFP process and based on the amount of General Funds that were committed to Human/Public Services as of the May 6, 2014 public hearing the FY 2015 General Fund human/public service project allocations will total \$1,129,000. This is subject to change in the final budget process.

FY 2015 Annual Action Plan Project Allocations and General Fund Requests are as follows:

Proj. #	AGENCY NAME	HUMAN/PUBLIC SERVICES FUNDING SOURCE	SERVICE CATEGORY	FUNDING AMOUNT
1	COT/Housing Management Division	CDBG	Public Services	\$18,000
2	Primavera Foundation/ Women's Services	CDBG	Public Services	\$50,000
3	Community Food Bank/TEFAP	CDBG	Public Services	\$190,000
4	TCWC dba Emerge! Center Against Domestic Abuse/Rapid Rehousing	ESG	Public Services	\$85,000
5	TCWC dba Emerge! Center Against Domestic Abuse/Domestic Abuse Services	ESG	Public Services	\$30,000
6	Pima Council on Aging/Elderly Independence w/CHRPAs	CDBG	Public Services	\$30,500
7	TCWC dba Emerge! Center Against Domestic Abuse/Domestic Abuse Services	CDBG	Public Services	\$190,000
8	Our Family Services, Inc./New Beginnings Homeless Prevention	ESG	Public Services	\$45,000
9	Our Family Services, Inc./New Beginnings Emergency Shelter	CDBG	Public Services	\$60,000
10	Our Family Services, Inc.	ESG	Homeless/HIV/AIDS	\$40,000
11	Chicanos por la Causa/Emergency Assistance to Prevent Homelessness	ESG	Public Services	\$45,000
12	Pima County HMIS System	ESG	Public Services	\$5,000
13	Primavera Foundation/ Emergency Services	CDBG	Homeless/HIV/AIDS	\$102,580
14	Primavera Foundation/ Greyhound Emergency Family Shelter	ESG	Homeless/HIV/AIDS	\$34,458
15	Section 108 Loan Repayment	CDBG	Infrastructure	\$120,000
16	Southern Arizona AIDS Foundation/HOPWA	HOPWA	Homeless/HIV/AIDS	\$439,471
17	MAC's Microenterprise Expansion Program	CDBG	Economic Development	\$75,000

18	Southern Arizona Children's advocacy Center/Clinical Services for Child Victims of Abuse	CDBG	Public Services	\$80,000
19	United Way	CDBG	Public Services	\$9,000
20	Our Family Services, Inc./ HYS Street Outreach	ESG	Public Services	\$30,000
21	Youth on Their Own/ Special Needs	CDBG	Homeless/HIV/ AIDS	\$40,000
22	Southwest Fair Housing Council	CDBG (Suitable Living Environment)	Planning/ Administration	\$25,000
23	Southwest Fair Housing Council	CDBG (Economic Opportunity)	Planning/ Administration	\$25,000
24	HRC/COT/HCD/PCSD/ City Neighborhood & Initiatives	CDBG	Owner Occupied Housing	\$417,000
25	HRC/COT/HCD/PCSD/ Emergency Home Repair	CDBG	Owner Occupied Housing	\$500,000
26	HRC/COT/HCD/PCSD/ HRC Environmental Compliance	CDBG	Owner Occupied Housing	\$180,000
27	HRC/Pima Council on Aging Elderly Home Repair	CDBG	Owner Occupied Housing	\$87,777
28	Chicanos por la Causa Roof Replacement Program	CDBG	Owner Occupied Housing	\$129,989
29	HRC DIRECT Home Access Program	CDBG	Owner Occupied Housing	\$137,189
30	HRC/CHRPCA/City Minor Emergency Home Repair	CDBG	Owner Occupied Housing	\$171,389
31	ESG Pilot Program	ESG	Public Services* Homeless*	\$52,000
32	HRC/Tucson Urban League Emergency Home Repair	CDBG	Owner Occupied Housing	\$195,689
33	HRC/Tucson Urban League Housing Rehab South Park	CDBG	Owner Occupied Housing	\$70,200
34	TMM Midtown Homeowner Program	CDBG	Owner Occupied Housing	\$107,489
35	HRC/Old Pueblo Community Foundation Housing Rehab Project	CDBG	Owner Occupied Housing	\$102,989
36	COT/HCD/PCSD Lead Based Paint Hazard Program Match	CDBG	Owner Occupied Housing	\$83,000
37	COT/HCD/PCSD VANS & Historic Stabilization	ZERO FUNDING		

	project			
38	COT/HCD/PCD ADA Accessibility Projects	CDBG	Public Facilities	\$100,000
39	COT/CDBG Target Area Public Facilities	CDBG	Public Facilities	\$741,310
40	Habitat for Humanity Preserve-a-Home Program	CDBG	Owner Occupied Housing	\$75,000
41	COT/HCD Green & Healthy Facilities Program	CDBG	Public Facilities	\$150,000
42	Tucson/Pima Collaboration to End Homelessness (TPCH) Community Partnership	CDBG	Planning/ Administration	\$25,000
43	City of Tucson HCD Administration	CDBG HOME	Planning/ Administration	\$947,775 \$252,299
44	Pima County Home Administration	HOME	Planning/ Administration	\$65,634
45	Pima County HOME Homeownership Opportunities	HOME	Owner Occupied Housing	\$100,000
46	Pima County HOME Rental Development & Preservation	HOME	Rental Housing	\$459,202
47	Pima County/CHDO Projects	HOME	Owner Occupied Housing	\$110,265
48	HCD/HOME Homeownership Opportunities	HOME	Owner Occupied Housing	\$143,819
49	HCD/HOME Rental Housing Partnership	HOME	Rental Housing	\$1,245,999
50	HCD/CHDO Projects	HOME	Owner Occupied Housing	\$283,539
51	HCD/HOME Tenant Based Rental Assistance (TBRA)	HOME	Rental Housing	\$20,000

	AGENCY NAME	PROJECT NAME		
	HUMAN/PUBLIC SERVICES FUNDED BY CITY OF TUCSON GENERAL FUNDS		SERVICE AREA	GENERAL FUND AMOUNT Requested
	Pima Council on Aging	Nutrition Program for the Elderly	Support Services	\$30,000
	Open Inn, Inc.	Transitional Apartment Living	Support Services	\$45,000
	Southern Arizona AIDS Foundation (SAAF)	Case Management Services for People Living with HIV/AIDS	Support Services	\$90,282
	Arizona's Children Association dba Las Familias	Sexual Abuse Counseling Services Project	Support Services	\$65,125
	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	\$50,000
	Esperanza En Escalante	Shelter Plus Care 4	Support Services	\$37,664
	Child & Family Resources	Happy Hours After School Program & Summer Camp	Youth/ Childhood Development and Support	\$30,000
	Miracle Square, Inc	Independent Living for Older Adults & Persons with Disabilities	Independent Living/ Elderly Housing	\$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	\$40,000
	Our Family Services, Inc.	Senior Companion Program	Support Services	\$30,000
	Our Family Services, Inc.	HYS Case Management	Support Services	\$30,000
	Our Family Services, Inc.	HYS Parent Education & Support	Youth/ Childhood Development and Support	\$42,712
	Our Family Services, Inc.	Reunion House	Youth/ Childhood Development and Support	\$30,000

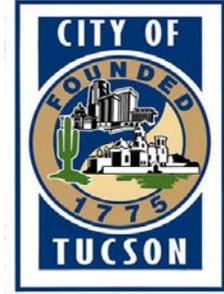
Tucson Urban League, Inc.	Seniors Meals Program	Support Services	\$33,000
AGENCY NAME	PROJECT NAME		
HUMAN/PUBLIC SERVICES FUNDED BY CITY OF TUCSON GENERAL FUNDS		SERVICE AREA	GENERAL FUND AMOUNT Requested
Southern Arizona Legal Aid, Inc.	Homeowner and Tenant Protection Program	Support Services	\$50,000
Community Food Bank of Southern Arizona	BackPack Program	Youth/ Childhood Development and Support	\$40,000
Community Food Bank of Southern Arizona	Caridad Community Kitchen Culinary Training Program	Education/ Job Training	\$40,000
The Child Language Center, Inc.	Early Intervention to promote school readiness and success	Youth/ Childhood Development and Support	\$45,000
The Early Childhood Development Group	Early Childhood Educator Career Development	Job Training	\$66,700
The Early Childhood Development Group	Tuition Support for High Quality Child Care	Youth/ Childhood Development and Support	\$58,070
Big Brothers Big Sisters of Tucson	One to One Adult to Child Mentoring	Education/ Job Training	\$40,000
Arizona Children's Association	The Parent Connection	Youth/ Childhood Development and Support	\$30,000
Interfaith Community Services	Caregiving/Health Advocacy Program	Support Services	\$40,000
Tu Nidito Children and Family Services	Children to Children	Support Services	
The YMCA of Southern Arizona	Child Care Means Success for Kids and Families	Youth Services	\$100,000
Sun Sounds of Arizona	Digital newspaper Access	Support Services	\$30,000
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	\$45,000

	Catholic Community Services	Community Outreach Program for the Deaf	Support Services	\$45,000
	Catholic Community Services dba Pio Decimo Center	Seniors Aging in Place	Support Services	\$33,030
	Chicanos por la Causa	Housing Counseling Services	Support Services	\$50,000
	Pima Prevention Partnership	Pima County Teen Court's Parent Support Services Project	Youth Services	\$35,000
	Pima Prevention Partnership	Pima County Teen Court	Youth Services	\$35,000
	Arts for All, Inc.	Youth/Childhood Development and Support	Youth Services	\$40,000
	Arts for All, Inc.	Teens Training in Childcare	Youth Services	\$30,000
	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	\$32,500
	CODAC Behavioral Health Services of Pima County, Inc.	Strengthening Families Program: Parents with Youth Ages 10 to 14	Youth Services	\$58,234
	CODAC Behavioral Health Services of Pima County, Inc.	Families Unite: Parents with Youth Ages 8 to 13 or grades 3 rd – 8 th	Youth/ Childhood Development and Support	\$64,075
	CODAC Behavioral Health Services of Pima County, Inc.	LGBTQA Health & Wellness Center Support Services	Support Services	\$65,489
	International Rescue Committee	Refugee Job Readiness Training	Education & Training	\$50,000
	Microbusiness Advancement Center of Southern Arizona	Job Skills for Small businesses	Education & Training	\$40,000
	Goodwill Industries	Ready-to-Earn	Education & Training	\$60,000
	AGENCY NAME	PROJECT NAME		
	HUMAN/PUBLIC SERVICES FUNDED BY CITY OF TUCSON GENERAL FUNDS		SERVICE AREA	GENERAL FUND AMOUNT Requested
	Youth on Their Own	Stipend Program	Education & Training	\$59,500
	Teen Outreach Pregnancy Services	Proactive Parenting for Adolescent Parents	Parenting Education & Support	\$75,000
	Teen Outreach Pregnancy Services	Healthy Teen Mom = Healthy Newborn	Parenting Education & Support	\$75,000

	DIRECT Center for Independence	Empowerment Through Employment	Education & Training	\$35,000
	Tucson Youth Development	Learn, Earn, Advance, Prosper (LEAP)	Education & Training	\$60,620
	Tucson Youth Development	Transition Counseling Program	Support Services	\$41,776
	The Primavera Foundation	Primavera Works	Education & Training	\$75,000
	Southern Arizona Association for the Visually Impaired	Educational Core Competency Program	Youth/ Childhood Development and Support	\$30,275
	Tucson Urban League	Employment and Training	Education & Training	\$110,000
	Portable Practical Educational Preparation	Youth Build Tucson Support	Education & Training	\$54,638
	YWCA	Yworks Employment Education	Education & Training	\$50,000
			Total Requested	\$2,683,690

** pending final budget adoption*

APPENDIX A – ESG POLICY MANUAL



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

Funds will be awarded by the ESG Grantees on a competitive basis. The Request for Proposal Notice is released through the Continuum of Care as well as through the City Participation Process. 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. Every effort is made to involve a homeless or formerly homeless person in the process. The committee ranks the proposals individually and then reviews them as a committee and makes the final funding recommendations.

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. Homelessness 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. Eligible costs include computer hardware, software, and software licenses. Also, office space, utilities, equipment and obtaining technical support may be paid for. Salaries for operation of HMIS may also be paid.
- 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 Statutes
 - 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 statute.
- 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 work with the HUD Regional Office and the Continuum of Care- represented by the Tucson Pima Collaboration to End Homelessness (TPCH), to ensure successful implementation and performance. The TPCH Emergency Solutions committee will review policies, procedures and performance measures.

F. FUNDS REALLOCATION AND RECAPTURE

Quarterly, the City and County ESG Program Coordinators will:

- Review financial reports and 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 which is part of the Consolidated Annual Performance Evaluation Report (CAPER). Annually, this information will be provided to the Emergency Solutions committee.

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 ESG Program staff will conduct 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. Sub-recipients conduct outreach to support ESG component goals and activities to persons who are homeless or near homeless so that they are aware of the program and its services.

I. COORDINATION AMONG PROVIDERS

Assistance is targeted to housing stabilization, linking program participants to mainstream resources and assisting them to develop a plan to increase future housing stability. Sub-recipients provide eligible services and activities which may include: case management, counseling, developing, securing and coordinating services, linkage with mainstream resources, monitoring and evaluation of program participant progress. Sub-recipients also assure that program participants' rights are protected, and develop individualized housing and service plans, including a path to permanent housing stability once ESG program assistance is no longer available.

Each sub-recipient is required to read and follow ESG guidelines as set forth by HUD. The procedures contained herein serve to simplify the implementation of the regulations and identify allowable activities.

Sub-recipients 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 sub-recipients receiving ESG assistance are required to participate in the local Homeless Management Information System (HMIS) or a comparable database and execute all Homeless Management Information System required documents as needed. These sub-recipients 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.

In the case of projects that provide housing or services to families, that sub recipients will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act;

Sub-recipients are required to participate in the centralized or coordinated assessment and intake system when it becomes available in our community.

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 provides 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).

2) Shelter Stay Procedures

3) Essential Services

4) Shelter Outreach Performance Measures

Number of persons:

- Placed in shelter or safe havens
- With more non-cash benefits at program exit
- Participating in case management

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

Number of persons:

- Exiting to temporary or transitional housing destinations
- Exiting to permanent housing destinations
- Participating in case management

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
- 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. 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.

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

Rent

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 may 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.

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

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

D. RAPID REHOUSING

The ESG Program can be utilized to fund housing relocation and stabilization services and rental assistance to individuals and families 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:

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. 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.
 - 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.

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- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
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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 may 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.

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 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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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 6 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 Rapid Re-Housing

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

5) Rapid Re-Housing Performance Standards

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

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

3. Procedures for Annual Plan and CAPER Reports
4. Use of IDIS
5. 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: <ul style="list-style-type: none"> • Placed in shelter or safe havens • With more non-cash benefits at program exit • Participating in case management
Emergency Shelter	Number of persons: <ul style="list-style-type: none"> • Exiting to temporary or transitional housing destinations • Exiting to permanent housing destinations • Participating in case management
Homelessness Prevention	Number of persons: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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

APPENDIX B

PUBLIC COMMENTS and RESPONSES

Date Received	Comment and Response
4/14/2014	<p>I believe more HOME funds should be allocated towards City Homeownership and less to City Rental Housing. After several years of the home ownership rate dropping in Tucson and Pima County, I believe there will be a growing demand for home ownership funding over the next five years. The allocation of funds between Homeownership and Rental should be more equal than proposed. Terry Galligan – Old Pueblo Community Services</p> <p>Response: The City receives a disproportionate number of rental project applications, this trend has continued in FY 2014. This will be discussed in the 5-year planning process.</p>
4/23/2014	<p>Request to explain the County project funding levels for agency contracts, timely expenditures and recapture policies. Melissa Gomes</p> <p>Response: This explanation was provided at the meeting.</p>
4/23/2014	<p>1) Maps and stress factors should be included in the plan for highlighting the high poverty areas so that agencies can address identified stressors.</p> <p>Response: There is link to the Poverty and Urban Stress Report on page 22 of the Plan.</p> <p>2) Long-term planning and collaborations for food security, e.g. networking and resource sharing among food banks and other emergency assistance food programs. Jackie Smith – Sahuarita Food Bank</p> <p>Response: This will be discussed in the 5-year planning process.</p>
4/23/2014	<p>A partnership should be developed between SAAF and CHRPA for emergency home repair for HOPWA clients. Allison Wood – Community Home Repair</p> <p>Response: The City encourages Community Home Repair to explore this partnership.</p>
4/27/2014	<p>Transportation funds for free bus passes should be allocated in projects that serve the homeless. Betty Bitgood – Hope of Glory Ministries</p> <p>Response: Bus passes are provided by Continuum of Care agencies that offer direct assistance to homeless persons. This will be noted in the text.</p>