

Program Specific Requirements

AP-90 Program Specific Requirements – 91.220(I)(1,2,4)

Introduction:

Community Development Block Grant Program (CDBG) Reference 24 CFR 91.220(I)(1)

Projects planned with all CDBG funds expected to be available during the year are identified in the Projects Table. The following identifies program income that is available for use that is included in projects to be carried out.

1. The total amount of program income that will have been received before the start of the next program year and that has not yet been reprogrammed	0
2. The amount of proceeds from section 108 loan guarantees that will be used during the year to address the priority needs and specific objectives identified in the grantee's strategic plan.	0
3. The amount of surplus funds from urban renewal settlements	0
4. The amount of any grant funds returned to the line of credit for which the planned use has not been included in a prior statement or plan	0
5. The amount of income from float-funded activities	0
Total Program Income:	0

Other CDBG Requirements

1. The amount of urgent need activities	0
2. The estimated percentage of CDBG funds that will be used for activities that benefit persons of low and moderate income. Overall Benefit - A consecutive period of one, two or three years may be used to determine that a minimum overall benefit of 70% of CDBG funds is used to benefit persons of low and moderate income. Specify the years covered that include this Annual Action Plan.	100.00%

HOME Investment Partnership Program (HOME)
Reference 24 CFR 91.220(l)(2)

- 1. A description of other forms of investment being used beyond those identified in Section 92.205 is as follows:**

No other forms of investment will be used.

- 2. A description of the guidelines that will be used for resale or recapture of HOME funds when used for homebuyer activities as required in 92.254, is as follows:**

The jurisdiction proposes recapture of HOME funds when homebuyers sell units before the expiration of the period of affordability, except in cases where funds are used for homeownership by Lexington Habitat for Humanity and the Lexington Community Land Trust. Homeownership supported by these two entities will use resale guidelines to ensure affordability of units.

- 3. A description of the guidelines for resale or recapture that ensures the affordability of units acquired with HOME funds? See 24 CFR 92.254(a)(4) are as follows:**

See Pages 93-96 in the appendices for resale and recapture guidelines.

- 4. Plans for using HOME funds to refinance existing debt secured by multifamily housing that is rehabilitated with HOME funds along with a description of the refinancing guidelines required that will be used under 24 CFR 92.206(b), are as follows:**

Use of HOME funds to refinance existing debt is not planned.

Emergency Solutions Grant (ESG)
Reference 91.220(l)(4)

- 1. Include written standards for providing ESG assistance (may include as attachment)**

See Page 98 in grantee's unique appendices.

- 2. If the Continuum of Care has established centralized or coordinated assessment system that meets HUD requirements, describe that centralized or coordinated assessment system.**

The Office of Homelessness Prevention and Intervention has produced policies and procedures for the OneDoor Lexington Coordinated Entry (coordinated assessment system) with a go-live date of May 24, 2016. This system provides that any homeless person may enter the system through any organization and be referred for the appropriate level of services Organizations' staff have been trained on use of the the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT). Recipients receiving funding from the U.S. Department of Housing and Urban Development's homeless assistance grants participate in the Kentucky Homeless Management Information System operated by the Kentucky

Housing Corporation (HMIS Lead Agency). Lexington has also begun requiring that all agencies receiving local and other public funds (CDBG) for services to the homeless population be compliant with entering data into the HMIS, and agree to participate in a coordinated assessment. The HMIS In Lexington is now an "open" system, which means that client data is shared for those individuals who have signed a Release of Information (ROI) form. Only a few agencies have elected to keep data closed. A truly integrated centralized intake system functions best in an "open" environment that allows users to view important information about other housing and services that a client household may have received. The Central Kentucky Homeless and Housing Initiative (CKHHI) has served as the Fayette County user group for the KYHMIS; however as of May 2015 this role was assumed by the Office of Homelessness Prevention and Intervention. The Director of the Office of Homelessness Prevention and Intervention is requiring that all subrecipients of general fund emergency shelter dollars participate in the development of a coordinated assessment and further agree to participate in its implementation.

Lexington's Office of Homelessness Prevention and Intervention has taken an active role in implementation of a coordinated assessment in Fayette County. The New Life Day Center (day shelter) and Hope Center will begin use of SkanPoint, which includes issuance of personal identification cards that will be used to access services. This will also provide the agencies and the community with more efficient tracking of the use of services by clients, as well as more accurate entry-exit data.

At this time, the lead HMIS agency is working to improve the structure of the system. The following goals have been completed:

- Confirming all agencies and all funding components within CoC structure.
- Restructuring all agency funding components for the ability to make multiple referrals to multiple agencies by email and share client/household data for that referral.
- Restructuring all agency funding components to comply with HUD's APR and CAPER reporting requirements.
- Conducting joint planning meeting with the HMIS lead agency to establish goals in relation to Lexington-Fayette County's homeless system needs.
- Conducting HMIS user training on new system structures and how to utilize the system for a community solution.

3. Identify the process for making sub-awards and describe how the ESG allocation available to private nonprofit organizations (including community and faith-based organizations).

For the 2016 Program Year, the Lexington-Fayette Urban County Government (LFUCG) used a public process to solicit applications for funding from the Emergency Solutions Grants program.

At the first Public Hearing on September 14, 2015, information on regulations and eligible activities along with forms to use were made available. Also included were the criteria that would be used to evaluate projects. A direct mail to nonprofit agencies serving homeless persons, low-income persons, and minority populations, low-income neighborhood associations, churches in low-income neighborhoods, and to Urban County Government council members and their staff was conducted to inform them of the process and how information on requesting funding could be obtained: paper

copies mailed from the government agency, computer disks, and downloading of fill-in the blank forms from the LFUCG web page. The LFUCG website was also used to inform the public of the process that would be followed. The website included the calendar of events in the process and the phone number to call to request further information and/or assistance.

All applications were due on or before December 4, 2015. The criteria used to review and rank applications included applicant capacity, project quality, need for project, and operational feasibility. ESG applications were reviewed and ranked by the staff of the LFUCG Division of Grants and Special Programs. These recommendations were then reviewed and approved by staff of the Chief Administrative Officer.

On January 8, 2016, the Director of the Division of Grants and Special Programs, Lexington-Fayette Urban County Government (LFUCG) consulted with the Office of Homeless Prevention and Intervention, the organizational entity that maintains responsibility for the Lexington/Fayette County Continuum of Care to discuss distribution of funds for the FY 2017 Emergency Solutions Grants Program. The distribution plan included the use of federal funds for homeless prevention for persons at-risk of homelessness and rapid re-housing for homeless persons, for operation of the area's homeless shelters that made applications for funds for operations, and for administration. This discussion included the need to develop a coordinated assessment in Fayette County, to become fully compliant with inputting data into Kentucky Homeless Management Information System, and to evaluate the programs funded under the Emergency Solutions Grants Program. It is anticipated that during the 2016 program year that the Division of Grants and Special Programs will improve the coordination between the jurisdiction and the CoC Agency.

4. If the jurisdiction is unable to meet the homeless participation requirement in 24 CFR 576.405(a), the jurisdiction must specify its plan for reaching out to and consulting with homeless or formerly homeless individuals in considering policies and funding decisions regarding facilities and services funded under ESG.

The LFUCG is governed by a Mayor and Council members elected by popular vote, and therefore cannot be directly compliant with this requirement. The Lexington Office of Homelessness Prevention and Intervention (OHPI) was created in June of 2014 with the appointment of a full-time director and the organization of a 13-member Homeless Prevention and Intervention (HPI) Board comprised of elected officials, business leaders, service providers, community advocates, faith-based organizations, and people experiencing homelessness.

The functions of the HPI Board include the following:

- Consider and recommend solutions to specific issues as they arise:
- Consider and advise Director of OHPI on broad matters that impact people experiencing homelessness:
- Review and consider progress on implementation of recommendations made by Mayor's Commission on Homelessness:
- Monitor key indicators and other data to track and understand trends:
- Support OHPI by disseminating activities and reports to respective constituencies and other key stakeholders:
- Establish guidelines for LFUCG funding to support activities that reduce and prevent homelessness: In addition, the LFUCG's Division of Adult and Tenant Services has organized an advisory committee for its homeless prevention/rapid re-housing services that includes two members of the formerly homeless population.

5. Describe performance standards for evaluating ESG.

The performance standard is to move homeless individuals and families into safe and affordable housing. Beginning with the 2015 program year, follow-up will be conducted up to six months after assistance has ended to ascertain if households are still permanently housed.

Discussion:

Homelessness Prevention

The performance standard is to ensure that individuals and families at-risk of homelessness be retained in or moved into safe and affordable housing. Beginning with the 2016 program year, follow-up will be conducted up to six months after assistance has ended to ascertain if households are still permanently housed.

Emergency Shelter

The performance standard is to provide safe emergency shelter services for persons who are homeless, and through case management and referral, assist them into advancing to permanent housing. Documentation of the number of homeless persons moving to permanent housing will be maintained.