

# 2022-23 Annual Action Plan

For Housing & Community Development  
in Suburban Monroe County



**ADAM J. BELLO**  
COUNTY EXECUTIVE

## Acquisition Rehabilitation Resale Project



ADA Ramp



Sewer Replacement

## Affordable Housing Project



Skyview Senior Apartments

**June 17, 2022**

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# Executive Summary

## AP-05 Executive Summary - 91.200(c), 91.220(b)

### 1. Introduction

Monroe County's Annual Action Plan (Plan) goals are administered utilizing CDBG, HOME, and ESG funds made available by the United States Department of Housing and Urban Development (HUD). Two Thousand and twenty-two marks the forty-seventh year that Monroe County has received an allocation from the Community Development Block Grant (CDBG) program, the thirty first year for Home Investment Partnerships Program (HOME), and it also marks the sixteenth year with the Emergency Solutions Grants (ESG) program. Combined, these program funds channel approximately \$3 million annually through the Department of Planning and Development, Community Development division, for suburban towns and villages that comprise Monroe County's consortium in support of housing, public works, economic development, and community services programs that primarily benefit low to moderate-income households, seniors, and persons with special needs. The Plan addresses both projects funded on an annual basis and new program initiatives that focuses on accomplishing the following primary program goals and objectives: • Develop affordable and accessible housing and home ownership opportunities for all low to moderate income residents, with a priority focus on the development of housing in the towns and villages that do not currently provide affordable units that have been financed, in part, through the CDBG and/or HOME programs • Repair and conserve existing housing stock • Improve essential infrastructure in lower income areas • Provide job training and economic development for low and moderate income persons and persons with special needs • Provide essential public services, particularly those that promote home ownership, fair housing, and housing stability • Revitalize deteriorated neighborhoods.

### 2. Summarize the objectives and outcomes identified in the Plan

This could be a restatement of items or a table listed elsewhere in the plan or a reference to another location. It may also contain any essential items from the housing and homeless needs assessment, the housing market analysis or the strategic plan.

Monroe County intends to continue our mission, which was identified in the Needs Assessment of Monroe County's 2020-2024 Strategic Plan in promoting community development to accomplish the following primary program goals and objectives during the 2022-2023 program year:

a) Develop affordable and accessible rental and home ownership opportunities for all low to moderate-income residents with a priority focus on the development of housing in towns and villages that do not

currently provide affordable units that have been financed, in part, through the County's CDBG and/or HOME Program; b) Repair and conserve existing housing stock; c) Increase energy efficiency of existing housing stock; d) Improve access to and the quality of public facilities; e) Provide essential infrastructure in lower income areas; f) Provide job training and economic development opportunities for low to moderate-income persons and person with special needs; g) Provide essential public services, particularly those that promote home ownership, fair housing ad housing stability; h) Revitalize deteriorated neighborhoods.

### **3. Evaluation of past performance**

This is an evaluation of past performance that helped lead the grantee to choose its goals or projects.

Projects funded with CDBG, HOME, and ESG grants have had a positive effect on the individuals and communities served. These projects carried out our primary program goals and objectives in housing, economic development, community services, and public works/facilities improvement projects. The Home Improvement Program (HIP) annually helps between 60 to 70 low to moderate-income homeowners make necessary home repairs. The repairs made under the HIP allow homeowners to make essential repairs that allow them to stay in their homes. This is all the more so a critical need in our community due to the lack of available housing stock/options for relocation. Neighborhood and utility improvements are a high priority for Monroe County because of their importance in preserving neighborhoods. A large number of communities throughout suburban Monroe County have deteriorated infrastructure due to age. Monroe County uses CDBG funding to improve roads, sidewalks, and sewers in low to moderate- income neighborhoods. This funding helps local governments undertake projects they would not otherwise be able to do because of funding limitations. Public services projects and programs have been essential in maintaining safe and affordable housing for the community and providing services that benefit underserved populations including seniors and those with special needs.

### **4. Summary of Citizen Participation Process and consultation process**

Summary from citizen participation section of plan.

Monroe County holds two (2) public hearings annually at convenient, fully accessible locations. For the 2022 program year, with the COVID-19 pandemic and the limitations on in-person gatherings, Monroe County hosted a hybrid in-person/virtual public meeting in January to inform and announce the opening of the 2022-23 application round, which was attended by 24 individuals. The Steering Committee meeting, which is comprised of town and village officials who are members of the County's Consortium, was held immediately following the public hearing and attended by 20 individuals. Meetings are fully accessible with bilingual and/or sign language interpreters and other accommodations provided upon request to interpret policies and program requirements.

The May public hearing was held on May 5, 2022 @ 10:00a with the Steering Committee @ 10:30a, which was also held in-person and via Zoom, which was attended by 16 individuals. This meeting encourages the public to review and comment on the Draft Annual Action Plan. The 30-day public comment period was available from May 5 – June 13, 2022. The public hearing notice and availability of the Draft Action Plan for public comment was posted in the Daily Record and the Rochester Business Journal newspapers, as well as the County’s website - Community Development page, and upon request.

**5. Summary of public comments**

This could be a brief narrative summary or reference an attached document from the Citizen Participation section of the Con Plan.

The Public Comment period was from May 5 – June 13, 2022. Public comments received will be attached to the Citizen Participation section of the Plan.

**6. Summary of comments or views not accepted and the reasons for not accepting them**

All comments received at the public hearing and during the public comment period are accepted.

**7. Summary**

All CDBG, HOME, and ESG funds, including program income will be used to continue to meet goals included in the Strategic Plan and in the 2022-23 Annual Action Plan to improve the quality of life for low to moderate-income families, seniors, and persons with special needs in Monroe County. The Plan addresses the goals by providing affordable housing and home ownership opportunities, repairing and conserving existing housing stock, financing public infrastructure and infrastructure improvements, creating and retaining jobs, and funding public services that stabilize and enhance living conditions.

**PR-05 Lead & Responsible Agencies - 91.200(b)**

**1. Agency/entity responsible for preparing/administering the Consolidated Plan**

The following are the agencies/entities responsible for preparing the Consolidated Plan and those responsible for administration of each grant program and funding source.

Agency Role	Name	Department/Agency
CDBG Administrator	MONROE COUNTY	Department of Planning and Development
HOME Administrator	MONROE COUNTY	Department of Planning and Development
ESG Administrator	MONROE COUNTY	Department of Planning and Development

**Table 1 – Responsible Agencies**

**Narrative**

Monroe County Department of Planning and Development, Community Development (CD) division is the lead agency that is responsible for and oversees the Annual Action Plan process and for administering the three (3) entitlement funds: Community Development Block Grant (CDBG), Home Investment Partnerships (HOME) program, and Emergency Solutions Grant (ESG) program funding. Programs are administered by CD staff with participation from the other divisions of the Planning and Development department, as well as municipal consortium members and private sector sub-recipients. CD staff administer the Home Improvement Program (HIP) and oversees the First Time Home Buyer (FTHB) Direct Subsidy component. The Economic Development (ED) division of the Department, through private, state, federal and county financial resources and technical assistance, supports businesses, developers, units of local government and major county facilities like the airport and landfill in economic development activities. The division provides administrative support to County of Monroe Industrial Development Agency (COMIDA), the Monroe County Industrial Development Corporation (MCIDC) and the Procurement Technical Assistance Center (PTAC). ED staff administers the CDBG funded ED Grant and Loan fund, Section 108 Loan Guarantee Program, and a wide variety of County business incentive programs. The Division of Planning provides a diverse set of services related to land use and development including: technical and mapping support in the development and implementation of various land use plans and regulations; guidance on project permitting and compliance with environmental review; preparation of the annual Land Use Report on major projects proposed, approved, and constructed; coordination of the Capital Improvement Program; training opportunities through the Spring and Fall Land Use Decision-Making Training Program. The Planning

division evaluates municipal planning and development activities including environmental reviews for all HUD projects and programs, including CDBG infrastructure project, Home Improvement Program (HIP) projects, and the HOME funded affordable rental housing developments and acquisition rehabilitation and resale projects. The Monroe County Finger Lakes Procurement Technical Assistance Center (PTAC), a component of the Monroe County Economic Development division, helps local businesses compete for and secure government contracts with other federal, state, and local agencies, including large government prime contractors, that will keep the business competitive and thriving in Monroe County and in our region. PTAC provides services to businesses in the nine-county Finger Lakes territory, at no cost. In addition, PTAC staff assists businesses with their M/WBE certifications and acquiring a DUNS numbers. Monroe County CD contracts with towns and villages for municipal projects, and sub-recipients for public services and first time homebuyers for those purchasing their first home in suburban Monroe County.

### **Consolidated Plan Public Contact Information**

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## **AP-10 Consultation - 91.100, 91.200(b), 91.215(l)**

### **1. Introduction**

Monroe County Department of Planning and Development consists of the Community Development, Economic Development, Planning, and Procurement Technical Assistance divisions. These four (4) divisions coordinate and collaborate on many efforts. CD works with local town and village governments, the City of Rochester, as well as many agencies, organizations, and groups to address the needs of the community. Monroe County is fortunate to be home to many agencies, organizations, and groups that focus on the wellbeing of the community as a whole.

**Provide a concise summary of the jurisdiction's activities to enhance coordination between public and assisted housing providers and private and governmental health, mental health and service agencies (91.215(l)).**

The Department of Planning and Development and the CD staff periodically meets with local developers, Fairport Urban Renewal Agency (FURA) to coordinate the planning of housing projects and federal grant applications. The County, City of Rochester, and RHA continue to explore ways to enhance our Section 3 efforts. Planning and Development coordinates, collaborates, and consults with other departments throughout Monroe County, including Human Services, Public Health, and Office of the Aging, in the planning process as often as possible and to maximize resources. Monroe County will continue to meet and coordinate with public and assisted housing providers within the Monroe County service area. These housing providers keep Monroe County informed about upcoming projects. Monroe County staff members are engaged with the Continuum of Care on initiatives for and in support of homeless and those at risk of homelessness.

**Describe coordination with the Continuum of Care and efforts to address the needs of homeless persons (particularly chronically homeless individuals and families, families with children, veterans, and unaccompanied youth) and persons at risk of homelessness.**

The County actively participates in the Rochester/Monroe County Homeless Continuum of Care (CoC) locally known as Partners Ending Homelessness (PEH). The CoC coordinates the allocation of federal funding to facilities and programs within the CoC's service area. County staff consult on a regular basis with the organizations that participate in the CoC and the Homeless Services Network (HSN). County staff serve on the CoC Board and on the Steering Committee of HSN. County staff also serve on the Chronically Homeless Work Group that plans, coordinates, and implements activities and strategies for servicing the chronically homeless and sits on the CoC Project Selection and Monitoring Committee. CoC staff participate in reviewing applications for Emergency Solution Grant applications submitted annually to Monroe County.

**Describe consultation with the Continuum(s) of Care that serves the jurisdiction's area in determining how to allocate ESG funds, develop performance standards for and evaluate outcomes of projects and activities assisted by ESG funds, and develop funding, policies and procedures for the operation and administration of HMIS**

County staff work closely with the CoC and other agencies to develop funding applications and determine the best use of ESG funds. By working with the CoC, County staff are involved in improving coordination among agencies, facilitating data collection through HMIS and allocating funds. The CoC Executive Director serves on the County ESG proposal review team along with staff from Monroe County Department of Human Services (DHS), City of Rochester, and community representatives. The County and the City release a joint RFP for ESG funding which has increased the efficiency and coordination of ESG funding in the community. The CoC Board has 21 ex-officio members representing public and private organizations deemed necessary to develop, maintain, monitor, and continuously improve a comprehensive, coordinated, and flexible system of homeless housing and support services. They represent Monroe County, City, Greece, RHA, Homeless Services Network (HSN - the CoC's Stakeholder Group), formerly homeless community members, a domestic violence advocacy organization member, and a health services representative. In addition, there are elected general members from both public and private groups from the community (business sector, legal field, faith-based organizations, veteran organizations, schools, law enforcement, criminal justice, advocacy groups). This diverse team is the primary planning and coordinating body for homeless housing and services in this community. The CoC is now a 501(c)(3) not-for-profit organization and is the Collaborative Applicant for HUD CoC funding and the HMIS Lead Agency. Long term goals include becoming a Unified Funding agency and continually striving to achieve the status of a High Performing Community. The CoC has been a long-time participant in the ESG planning process for the County and City, and are represented on the Rating and Ranking Committee of the CoC to review applications submitted annually for HUD CoC Homeless Program funding. ESG community priorities and planning have been discussed at both CoC and HSN meetings, especially in terms of policy priorities, the efficient use of resources and community objectives. The CoC staff also reviews the ESG proposals for fidelity to the ESG requirements and additional information set forth by HUD via icy briefs. ESG funding continues to be a critical issue for local homeless service providers. Facilitated discussions of ESG community priorities are held at the HSN meetings; CoC members and community stakeholders are strongly encouraged to participate. The County staff members participate on the Coordinated Entry (CE) Oversight workgroup. CE is the portal for all referrals to Permanent Supportive Housing and Rapid Re-Housing programs and prioritizes those who are the most vulnerable when openings occur. CE is fully implemented in Monroe County and is continually being improved. CE is working and is successful in ensuring that homeless persons are directed to the programs that will best meet their needs; and that homeless persons with the highest vulnerability are prioritized for placement. CE is exploring options for a new vulnerability assessment tool. The current tool, the VSPDAT is no longer being supported. CE will look at other existing tools or develop a community tool. CE has created a new position and since hired a Housing Resource Specialist who will recruit landlords to provide units for PSH and RRH programs; and be liaison between programs and landlords. The CE project has also just hired a Housing Recruitment Specialist who will be doing



landlord engagement to increase available units for homeless persons and centralizing information on permanent housing resources and unit availability in the CE website, [www.FrontdoorNY.org](http://www.FrontdoorNY.org).

**2. Agencies, groups, organizations and others who participated in the process and consultations**

**Table 2 – Agencies, groups, organizations who participated**

1	<b>Agency/Group/Organization</b>	Rochester Housing Authority
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
2	<b>Agency/Group/Organization</b>	Monroe County Department of Health
	<b>Agency/Group/Organization Type</b>	Services-Health Health Agency Other government - Local
	<b>What section of the Plan was addressed by Consultation?</b>	Lead-based Paint Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
3	<b>Agency/Group/Organization</b>	ROCHESTER/MONROE COUNTY HOMELESS CONTINUUM OF CARE, INC.
	<b>Agency/Group/Organization Type</b>	Continuum of Care/HMIS

	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Homeless Needs - Chronically homeless Homeless Needs - Families with children Homelessness Needs - Veterans Homelessness Needs - Unaccompanied youth Homelessness Strategy
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
4	<b>Agency/Group/Organization</b>	Fairport Urban Renewal Agency
	<b>Agency/Group/Organization Type</b>	Housing PHA
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment Public Housing Needs Market Analysis Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	
5	<b>Agency/Group/Organization</b>	HOUSING COUNCIL IN MONROE COUNTY AREA, INC
	<b>Agency/Group/Organization Type</b>	Housing Services - Housing Service-Fair Housing
	<b>What section of the Plan was addressed by Consultation?</b>	Housing Need Assessment
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

6	<b>Agency/Group/Organization</b>	Monroe County Planning Department
	<b>Agency/Group/Organization Type</b>	Other government - County Planning organization Grantee Department
	<b>What section of the Plan was addressed by Consultation?</b>	Economic Development
	<b>Briefly describe how the Agency/Group/Organization was consulted. What are the anticipated outcomes of the consultation or areas for improved coordination?</b>	

**Identify any Agency Types not consulted and provide rationale for not consulting**

**Other local/regional/state/federal planning efforts considered when preparing the Plan**

<b>Name of Plan</b>	<b>Lead Organization</b>	<b>How do the goals of your Strategic Plan overlap with the goals of each plan?</b>
Continuum of Care	Partners Ending Homelessness	

**Table 3 – Other local / regional / federal planning efforts**

**Narrative**

**AP-12 Participation - 91.401, 91.105, 91.200(c)**

**1. Summary of citizen participation process/Efforts made to broaden citizen participation  
Summarize citizen participation process and how it impacted goal-setting**

Monroe County hosted its public hearings in person and remotely in order to accommodate and allow for access to participants to participate in public hearings most convenient and accessible for participants.

Monroe County is amending its Citizen Participation Plan to continue this hybrid in-person and virtual public hearing to make it available and accessible for as many individuals as possible. An in-person meeting will allow those who do not have access to the internet to attend and participate. Interpreting services are available upon request.

**Citizen Participation Outreach**

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (if applicable)
1	Public Hearing	Minorities Persons with disabilities Non-targeted/broad community held virtually and in person for all	24 individuals attended the January 2022 meeting, 16 individuals attended the May 2022 meeting	No comments were received		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
2	Newspaper Ad	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing all subscribers of the publication		homeowner was appreciative of an infrastructure project completed utilizing 2020 CDBG funds, which has been life changing now that there is no more concern of flooding in their basement		

Sort Order	Mode of Outreach	Target of Outreach	Summary of response/attendance	Summary of comments received	Summary of comments not accepted and reasons	URL (If applicable)
3	County website	Minorities Persons with disabilities Non-targeted/broad community Residents of Public and Assisted Housing anyone that visits the Comm Dev page				

**Table 4 – Citizen Participation Outreach**

## Expected Resources

### AP-15 Expected Resources - 91.420(b), 91.220(c)(1,2)

#### Introduction

2022 marks the third year of Monroe County's 2020-2024 Five-year Consolidated Plan. This is the 47th year of the Community Development Block Grant program, and the 31st year of the HOME Investment Partnerships Program. This is the sixteenth year that Monroe County has received an Emergency Solutions Grants allocation. Funds for all three programs are used for projects that primarily benefit lower income families, elderly and disabled residents in the suburban towns and villages in the county of Monroe. The Community Development division of the Department of Planning and Development administers these HUD-funded programs on behalf of 17 towns and 10 villages that comprise the Monroe County Community Development Consortium. All municipalities in Monroe County are members of the consortium, with the exception of Greece, Irondequoit and the City of Rochester. The Towns of Greece and Irondequoit participate in the HOME Program only, bringing HOME consortium membership to 19 towns and 10 villages. The Towns of Greece and Irondequoit apply directly to HUD and receive their own CDBG allocations. The City of Rochester also receives funding directly from HUD for these programs. Monroe County expects to receive an allocation of \$3,327,610 from HUD for the period of August 1, 2022 to July 31, 2023. This represents the combined total of funds for the Community Development Block Grant (CDBG) in the amount of \$1,831,694; the Home Investment Partnerships Program (HOME) in the amount of \$1,337,575; and the Emergency Solutions Grants Program (ESG) in the amount of \$158,341. This year's allocation includes an increase of \$101,498 from HUD funding received last year.

Estimated program income (interest on outstanding loans and other repayments) is expected to total \$62,143 for the CDBG program and



\$137,924 for the HOME program.

**Anticipated Resources**

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
CDBG	public - federal	Acquisition Admin and Planning Economic Development Housing Public Improvements Public Services	1,831,694	62,143	0	1,893,837	3,784,448	Funding to be used for Admin and Planning, Economic Development, Housing, Public Improvements, Public Services,
HOME	public - federal	Acquisition Homebuyer assistance Homeowner rehab Multifamily rental new construction Multifamily rental rehab New construction for ownership TBRA	1,337,575	137,924	0	1,475,499	2,547,761	Funding to be used for Admin, development of affordable rental and homeownership, as well as home improvement and direct subsidies for closing and/or down payment assistance.

Program	Source of Funds	Uses of Funds	Expected Amount Available Year 1				Expected Amount Available Remainder of ConPlan \$	Narrative Description
			Annual Allocation: \$	Program Income: \$	Prior Year Resources: \$	Total: \$		
ESG	public - federal	Conversion and rehab for transitional housing Financial Assistance Overnight shelter Rapid re-housing (rental assistance) Rental Assistance Services Transitional housing	158,341	0	0	158,341	328,726	Funding to be used for Admin, Financial assistance, Overnight shelter, Rapid re-housing (rental assistance), Rental Assistance, Services

Table 2 - Expected Resources – Priority Table

**Explain how federal funds will leverage those additional resources (private, state and local funds), including a description of how matching requirements will be satisfied**

The potential sources of these leveraged funds (other than match funds) include investor equity, tax credit syndications; homebuyer down payments through private funding, private rental and home ownership loans; other federal, state, and local housing and community development programs and foundations. CDBG, HOME, and ESG sources leveraged additional resources, which are wide, including the items listed. Match contributions for both HOME and ESG will be made from non-federal resources. The match contributions for HOME will total no less than 25% of the funds drawn from the County’s HOME account each fiscal year. Monroe County CD maintains records demonstrating compliance with HOME match requirements, including a running log and project records documenting the type and amount of match contributions by project. The HOME program attracts substantial private and other public dollars into its funded projects. This year, Monroe

County, through our non-profit partner has also secured a grant from a local bank to help offset the cost of up to three (3) properties through the acquisition, rehab, resale program. Match contribution from ESG will be a one-to-one (1:1) cash and or/in-kind services match.

**If appropriate, describe publically owned land or property located within the jurisdiction that may be used to address the needs identified in the plan**

There are no publicly owned properties in Monroe County that are funded through any of the funding sources from HUD.

**Discussion**

## Annual Goals and Objectives

### AP-20 Annual Goals and Objectives - 91.420, 91.220(c)(3)&(e)

#### Goals Summary Information

Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
1	Improve access to and quality of public facilities	2020	2024	Public Facilities	Brighton Gates Henrietta Penfield Sweden East Rochester Fairport Chili Village of Webster	Public Facilities	CDBG: \$614,666	Public Facility or Infrastructure Activities other than Low/Moderate Income Housing Benefit: 6650 Persons Assisted

2	Repair and conserve existing housing stock	2020	2024	Affordable Housing	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster	Housing Rehabilitation	CDBG: \$558,695 HOME: \$931,549	Homeowner Housing Rehabilitated: 70 Household Housing Unit
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3	Provide essential public services	2020	2024	Homeless Non-Homeless Special Needs	Monroe County Service Area block groups Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of	Public Services (Community Development)	CDBG: \$243,400	Public service activities for Low/Moderate Income Housing Benefit: 1223 Households Assisted
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
					Pittsford Village of Webster			
<b>4</b>	Provide Economic Development and Job Training	2020	2024	Non-Homeless Special Needs Non-Housing Community Development	Monroe County Service Area block groups	Business / Jobs Development (Economic Development)	CDBG: \$120,000	Jobs created/retained: 4 Jobs Businesses assisted: 1 Businesses Assisted



5	Develop Affordable Housing Opportunities	2020	2024	Affordable Housing	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster	Affordable Housing	HOME: \$346,400	Rental units constructed: 2 Household Housing Unit Homeowner Housing Added: 3 Household Housing Unit
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Sort Order	Goal Name	Start Year	End Year	Category	Geographic Area	Needs Addressed	Funding	Goal Outcome Indicator
6	Provide planning and administration services	2020	2024	Non-Housing Community Development Planning / Administration	Monroe County Service Area block groups	Planning / Administration	CDBG: \$310,084 HOME: \$147,550	Other: 1 Other

**Table 3 – Goals Summary**

**Goal Descriptions**

1	<b>Goal Name</b>	Improve access to and quality of public facilities
	<b>Goal Description</b>	
2	<b>Goal Name</b>	Repair and conserve existing housing stock
	<b>Goal Description</b>	
3	<b>Goal Name</b>	Provide essential public services
	<b>Goal Description</b>	
4	<b>Goal Name</b>	Provide Economic Development and Job Training
	<b>Goal Description</b>	
5	<b>Goal Name</b>	Develop Affordable Housing Opportunities
	<b>Goal Description</b>	
6	<b>Goal Name</b>	Provide planning and administration services
	<b>Goal Description</b>	



## AP-35 Projects - 91.420, 91.220(d)

### Introduction

Monroe County proposes to fund the following projects for the 2022-23 program year. Funds will be used to repair and conserve existing housing stock; improve access to and quality of public facilities; provide essential infrastructure in lower income areas; provide job training and economic development opportunities to low to moderate-income persons and persons with special needs; provide essential public services, particularly to those that promote home ownership, fair housing, and housing stability and revitalize deteriorated neighborhoods. Funds will also be used to develop affordable housing, home ownership opportunities for all low to moderate income residents with a priority focus on the development of affordable housing in towns and villages that do not currently have affordable housing units. ESG funds will be used to fund shelter operations, coordinated entry, rapid rehousing, and homelessness prevention. The CDBG, HOME, and ESG allocations fund the general administration of each respective grant.

#	Project Name
1	Sidewalk Installation, Brighton
2	Sidewalk Installation, Chili
3	Kentucky Avenue/Lions Park Rehabilitation, Gates
4	Sanitary Sewer Relining, Henrietta
5	Storm Sewer Improvements, Penfield
6	Sidewalk Installation, Sweden
7	Sidewalk Installation, T/V East Rochester
8	Homestead and Fireside Storm Sewer Main Lining Project - Phase II
9	Kircher Park Sidewalk Replacement and Sewer CIPP, Village of Webster
10	Safety and Security for Seniors, LifeSpan
11	Expanding Housing Opportunities, The Housing Council at PathStone
12	Housing Stability Program, The Housing Council at PathStone
13	Homeownership Program, The Housing Council at PathStone
14	Sewing division, ABVI Goodwill of the Finger Lakes
15	Home Improvement Program (HIP)
16	Lead Testing and Clearance, Proway
17	ED Loan and Grant Fund
18	Administration
19	Planning Services, Urban Vantage
20	Program Delivery, Home Improvement Program
21	Program Delivery, Economic Development
22	Program Delivery, Planning Services
23	First-time Homebuyer
24	Rental Housing Development

#	Project Name
25	Acquisition Rehab Resale
26	ESG 2022

**Table 4 – Project Information**

**Describe the reasons for allocation priorities and any obstacles to addressing underserved needs**

**AP-38 Project Summary**  
**Project Summary Information**

1	<b>Project Name</b>	Sidewalk Installation, Brighton
	<b>Target Area</b>	Brighton
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$84,898
	<b>Description</b>	Replacement of sidewalk on East Avenue
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	290 households will benefit from this project
	<b>Location Description</b>	East Avenue near Clover
	<b>Planned Activities</b>	Install of 700 LF of proposed concrete sidewalks
2	<b>Project Name</b>	Sidewalk Installation, Chili
	<b>Target Area</b>	Chili
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$51,521
	<b>Description</b>	Replacement of sidewalk on East Avenue
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	985 households will benefit from this project
	<b>Location Description</b>	Archer Road in the town of Chili
	<b>Planned Activities</b>	Install of 1,400 LF of 5'-0" concrete sidewalk
3	<b>Project Name</b>	Kentucky Avenue/Lions Park Rehabilitation, Gates
	<b>Target Area</b>	Gates
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$84,247

	<b>Description</b>	Rehabilitate Lions Park parking lot - Kentucky Avenue is 800 feet long and the parking lot is roughly 27,000 square feet. Improve drainage and pedestrian safety along Kentucky Avenue, restore the Lions Park parking lot, and has an anticipated 50-year life with appropriate and timely preventative maintenance.
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1,925 households will benefit from this project
	<b>Location Description</b>	Lions Park/Kentucky Avenue
	<b>Planned Activities</b>	Rehabilitate Lions Park parking lot, improve drainage and widen Kentucky Ave adding a bike lane
<b>4</b>	<b>Project Name</b>	Sanitary Sewer Relining, Henrietta
	<b>Target Area</b>	Henrietta
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$41,000
	<b>Description</b>	Sanitary Sewer Slip Lining and CIPP
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	475 households will benefit from this project
	<b>Location Description</b>	Sienna Drive in the town of Henrietta
	<b>Planned Activities</b>	885 L.F. of 8" VCP sanitary sewer main on Sienna Drive to be repaired with cured-in-place pipe rehabilitation.
<b>5</b>	<b>Project Name</b>	Storm Sewer Improvements, Penfield
	<b>Target Area</b>	Penfield
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$69,465



	<b>Description</b>	Lining of storm sewer and structure Improvements to the existing elevated sewer bridge, located in the existing manufactured home park at Harper Park
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	290 households will benefit from this project
	<b>Location Description</b>	Harper Park in the town of Penfield
	<b>Planned Activities</b>	Slip line approx. 286 LF of sanitary sewer, reinforce concrete piers
<b>6</b>	<b>Project Name</b>	Sidewalk Installation, Sweden
	<b>Target Area</b>	Sweden
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$75,000
	<b>Description</b>	Installation of sidewalk on Crestview Drive
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	925 households will benefit from this project
	<b>Location Description</b>	Northside of Crestview Drive in the town of Sweden
	<b>Planned Activities</b>	Installation of 1,200 linear feet sidewalks in the town of Sweden
<b>7</b>	<b>Project Name</b>	Sidewalk Installation, T/V East Rochester
	<b>Target Area</b>	East Rochester
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$70,000
	<b>Description</b>	Replacement of sidewalk on Main Street 300 block East
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	330 households will benefit from this project
	<b>Location Description</b>	East side of the 300 block of Main Street across from the Town/Village Municipal offices
	<b>Planned Activities</b>	Replacement of sidewalks in the town/village of East Rochester
<b>8</b>	<b>Project Name</b>	Homestead and Fireside Storm Sewer Main Lining Project - Phase II
	<b>Target Area</b>	Fairport
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$53,745
	<b>Description</b>	Lining of storm sewers on Homestead Drive (Whitney Rd to Fireside Lane)
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	195 households will benefit from this project
	<b>Location Description</b>	Homestead Drive (Whitney Rd to Fireside Lane) in the village of Fairport
	<b>Planned Activities</b>	Lining of 440 ft. of 18 inch and 140 ft of 21 inch storm sewer main
<b>9</b>	<b>Project Name</b>	Kircher Park Sidewalk Replacement and Sewer CIPP, Village of Webster
	<b>Target Area</b>	Village of Webster
	<b>Goals Supported</b>	Improve access to and quality of public facilities
	<b>Needs Addressed</b>	Public Facilities
	<b>Funding</b>	CDBG: \$84,790
	<b>Description</b>	Sidewalk replacement along east side of Kircher Park
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	1,235 households will benefit from this project

	<b>Location Description</b>	Kircher Park, Village of Webster
	<b>Planned Activities</b>	Approximately 1,100 linear feet of sidewalk will be replaced with this project along with approximately 1,120 linear feet of sewer collection main lining
<b>10</b>	<b>Project Name</b>	Safety and Security for Seniors, LifeSpan
	<b>Target Area</b>	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster
	<b>Goals Supported</b>	Provide essential public services
	<b>Needs Addressed</b>	Public Services (Community Development)
	<b>Funding</b>	CDBG: \$58,000
	<b>Description</b>	
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	850 seniors will benefit from this project
	<b>Location Description</b>	Services will be provided to seniors throughout suburban Monroe County, excluding the towns of Greece and Irondequoit
	<b>Planned Activities</b>	350 suburban seniors will receive home environmental/fall prevention assessments and minor home modifications, 500 attendees at community outreach, educational presentations, including 15 cases of consultation, advocacy, investigation, and resolution for potential scams and fraud
<b>11</b>	<b>Project Name</b>	Expanding Housing Opportunities, The Housing Council at PathStone
	<b>Target Area</b>	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster

<b>Goals Supported</b>	Provide essential public services
<b>Needs Addressed</b>	Public Services (Community Development)
<b>Funding</b>	CDBG: \$45,000
<b>Description</b>	Rental management and educational program for tenants, landlords, homebuyers, home sellers, real estate professionals, and other housing providers for suburban residents. County-wide fair housing guidance
<b>Target Date</b>	
<b>Estimate the number and type of families that will benefit from the proposed activities</b>	150 total low-mod households will benefit from this service
<b>Location Description</b>	Services will be provided at The Housing Council offices
<b>Planned Activities</b>	Comprehensive county-wide fair housing rental management and education programs for tenants, landlords, home buyers and sells, real estate professionals and other housing providers. Includes weekly seminars, workshops, one-to-one counseling and the provision of educational materials, publications of rights and responsibilities, fair housing guidance, apartment listings, and quarterly newsletters
<b>Project Name</b>	Housing Stability Program, The Housing Council at PathStone

<b>12</b>	<b>Target Area</b>	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster
	<b>Goals Supported</b>	Provide essential public services
	<b>Needs Addressed</b>	Public Services (Community Development)
	<b>Funding</b>	CDBG: \$50,000
	<b>Description</b>	Provide mortgage foreclosure prevention counseling and outreach. Conduct outreach to at-risk homeowners
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	70 low-mod income households will benefit from this service
	<b>Location Description</b>	Services will be provided at The Housing Council offices

	<b>Planned Activities</b>	Mortgage foreclosure prevention counseling and outreach including Home Equity Conversion Mortgage counseling
<b>13</b>	<b>Project Name</b>	Homeownership Program, The Housing Council at PathStone
	<b>Target Area</b>	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster
	<b>Goals Supported</b>	Provide essential public services
	<b>Needs Addressed</b>	Public Services (Community Development)
	<b>Funding</b>	CDBG: \$60,000
	<b>Description</b>	Homebuyer education and pre- and post-purchase classes
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	179 low-mod income households will benefit from this service, approximately 7 homeowners will benefit from down payment and closing cost assistance from County HOME funding
	<b>Location Description</b>	Services provided are to suburban residents in Monroe County
	<b>Planned Activities</b>	142 households will receive one-on-one counseling and group education services, develop a sustainable household budget through the provision of financial management and/or budget services, improve their financial capacity, gain access to resources to help improve their housing situation including pre-purchase workshops and post-purchase workshops
<b>14</b>	<b>Project Name</b>	Sewing division, ABVI Goodwill of the Finger Lakes
	<b>Target Area</b>	Monroe County Service Area block groups
	<b>Goals Supported</b>	Provide essential public services
	<b>Needs Addressed</b>	Public Services (Community Development)
	<b>Funding</b>	CDBG: \$30,400
	<b>Description</b>	Purchase of equipment for Sewing division expansion
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	11 jobs created/retained
	<b>Location Description</b>	Offices are located in the city of Rochester, however, jobs retained/created live in areas throughout Monroe County
	<b>Planned Activities</b>	Purchase equipment for the Sewing Division expansion
	<b>Project Name</b>	Home Improvement Program (HIP)



15	<b>Target Area</b>	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster
	<b>Goals Supported</b>	Repair and conserve existing housing stock
	<b>Needs Addressed</b>	Housing Rehabilitation
	<b>Funding</b>	CDBG: \$503,687 HOME: \$931,549
	<b>Description</b>	Provide grants/loans to repair and revitalize homes in suburban towns and villages throughout Monroe County to income eligible homeowners
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	70 low-mod income households will benefit from this project
	<b>Location Description</b>	Services will be provided to homeowners in towns and villages throughout suburban Monroe County
	<b>Planned Activities</b>	provide grants/loans to repair and revitalize homes in suburban towns and villages throughout suburban Monroe County to income eligible homeowners
<b>16</b>	<b>Project Name</b>	Lead Testing and Clearance, Proway
	<b>Target Area</b>	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster
	<b>Goals Supported</b>	Repair and conserve existing housing stock

	<b>Needs Addressed</b>	Public Services (Community Development)
	<b>Funding</b>	CDBG: \$20,000
	<b>Description</b>	Perform lead paint assessments, testing, inspections, and other clearance activities on an as needed basis for the Home Improvement Program
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Income eligible households whom are part of the Home Improvement program with homes built before 1978
	<b>Location Description</b>	Throughout towns and villages in suburban Monroe County
	<b>Planned Activities</b>	Lead assessment and clearances for Home Improvement Program projects
<b>17</b>	<b>Project Name</b>	ED Loan and Grant Fund
	<b>Target Area</b>	Monroe County Service Area block groups
	<b>Goals Supported</b>	Provide Economic Development and Job Training
	<b>Needs Addressed</b>	Business / Jobs Development (Economic Development)
	<b>Funding</b>	CDBG: \$120,000
	<b>Description</b>	Provide loans or grants to businesses for the retainage or creation of low-moderate income jobs
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	Retain/create 3 low-mod jobs
	<b>Location Description</b>	Low interest loans or grants for businesses that are expanding or relocating to Monroe County and will create or retain jobs for low-mod income individuals
<b>Planned Activities</b>	Provide loan/grants to businesses moving into or expanding in suburban Monroe County	
<b>18</b>	<b>Project Name</b>	Administration
	<b>Target Area</b>	Monroe County Service Area block groups
	<b>Goals Supported</b>	Provide planning and administration services

	<b>Needs Addressed</b>	Planning / Administration
	<b>Funding</b>	CDBG: \$310,084 HOME: \$147,550
	<b>Description</b>	General administration for Community Development Block Grant (CDBG) and Home Investment Partnerships Program (HOME)
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	50 West Main Street, Rochester, New York 14614
	<b>Planned Activities</b>	General administration of CDBG and HOME program
<b>19</b>	<b>Project Name</b>	Planning Services, Urban Vantage
	<b>Target Area</b>	Monroe County Service Area block groups
	<b>Goals Supported</b>	Provide planning and administration services
	<b>Needs Addressed</b>	Planning / Administration
	<b>Funding</b>	CDBG: \$12,000
	<b>Description</b>	Consulting services and technical assistance for planning, fair housing, and recommendations outlined in the Update to Analysis of Impediments 2020
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	
	<b>Planned Activities</b>	Technical assistance and consultation
<b>20</b>	<b>Project Name</b>	Program Delivery, Home Improvement Program
	<b>Target Area</b>	Monroe County Service Area block groups
	<b>Goals Supported</b>	Provide planning and administration services
	<b>Needs Addressed</b>	Planning / Administration
	<b>Funding</b>	CDBG: \$20,000
	<b>Description</b>	Program delivery for the Home Improvement Program

	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	50 West Main Street, Rochester, New York 14614
	<b>Planned Activities</b>	Program delivery for Home Improvement Program
<b>21</b>	<b>Project Name</b>	Program Delivery, Economic Development
	<b>Target Area</b>	Monroe County Service Area block groups
	<b>Goals Supported</b>	Provide planning and administration services
	<b>Needs Addressed</b>	Planning / Administration
	<b>Funding</b>	CDBG: \$25,000
	<b>Description</b>	Provide financial review and eligibility of Economic Development grant and/or loan fund projects
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	50 West Main Street, Rochester, New York 14614
	<b>Planned Activities</b>	Program delivery for Economic Development loan/grant
<b>22</b>	<b>Project Name</b>	Program Delivery, Planning Services
	<b>Target Area</b>	Monroe County Service Area block groups
	<b>Goals Supported</b>	Provide planning and administration services
	<b>Needs Addressed</b>	Planning / Administration
	<b>Funding</b>	CDBG: \$25,000
	<b>Description</b>	Provide planning, environmental, and mapping services
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	N/A
	<b>Location Description</b>	50 West Main Street, Rochester, New York 14614

	<b>Planned Activities</b>	Program delivery for Planning
<b>23</b>	<b>Project Name</b>	First-time Homebuyer
	<b>Target Area</b>	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster
	<b>Goals Supported</b>	Develop Affordable Housing Opportunities
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$50,000
	<b>Description</b>	Direct subsidy for First-Time Homebuyers administered by The Housing Council at PathStone
	<b>Target Date</b>	

	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	7 low-income first time homebuyers will benefit from this service
	<b>Location Description</b>	Homebuyers purchasing their first home in suburban towns and villages throughout Monroe County
	<b>Planned Activities</b>	Direct subsidy for down payment or closing cost assistance for income eligible first time homebuyers purchasing their first home in suburban Monroe County
<b>24</b>	<b>Project Name</b>	Rental Housing Development
	<b>Target Area</b>	Brockport
	<b>Goals Supported</b>	Develop Affordable Housing Opportunities
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$119,400
	<b>Description</b>	Development of affordable rental housing in the village of Brockport
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 individuals will benefit from this project
	<b>Location Description</b>	New construction development of 2 (1 bedroom units) at 15 Evelyn Drive – IRA apartments in the village of Brockport
	<b>Planned Activities</b>	New construction to add 2 new 1 bedroom units, expanding the property from 10 units to 12 units to allow for individuals to have their own rooms
	<b>Project Name</b>	Acquisition Rehab Resale

25	<b>Target Area</b>	Brighton Gates Henrietta Ogden Parma Penfield Perinton Rush Sweden Brockport Churchville East Rochester Fairport Hilton Pittsford Scottsville Webster Chili Clarkson Hamlin Mendon Riga Wheatland Honeoye Falls Spencerport Village of Pittsford Village of Webster
	<b>Goals Supported</b>	Develop Affordable Housing Opportunities
	<b>Needs Addressed</b>	Affordable Housing
	<b>Funding</b>	HOME: \$227,000
	<b>Description</b>	Acquisition rehab resale program throughout suburban Monroe County
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	2 households will benefit from this project
	<b>Location Description</b>	Throughout towns and villages in suburban Monroe County



	<b>Planned Activities</b>	Acquisition, rehab, and resale of single family residential properties to income eligible first time homebuyers
<b>26</b>	<b>Project Name</b>	ESG 2022
	<b>Target Area</b>	Monroe County Service Area block groups
	<b>Goals Supported</b>	Provide essential public services Provide planning and administration services
	<b>Needs Addressed</b>	Public Services (Community Development) Planning / Administration
	<b>Funding</b>	ESG: \$158,341
	<b>Description</b>	Homelessness Prevention \$55,000 (CFC \$25,000, HOPE Webster/Penfield \$30,000); Rapid Rehousing \$40,000; Street Outreach \$51,465.42 (PCHO \$31,936.42 Coordinated Access \$19,529); and Administration \$11,875.58
	<b>Target Date</b>	
	<b>Estimate the number and type of families that will benefit from the proposed activities</b>	25 youth in the shelters, 10 rapid rehousing households, 32 persons assisted via homeless prevention and 25 individuals assisted via street outreach.
	<b>Location Description</b>	Monroe county service area
	<b>Planned Activities</b>	Homelessness Prevention, Rapid Rehousing, Street Outreach, Shelter operations, and Administration

**AP-50 Geographic Distribution - 91.420, 91.220(f)**

**Description of the geographic areas of the entitlement (including areas of low-income and minority concentration) where assistance will be directed**

Targeted areas are all within Monroe County’s service area, including public facilities and infrastructure improvements in Brighton, Chili, Gates, Henrietta, Penfield, Sweden, East Rochester, Fairport, and the Village of Webster this year. Other than public facilities, funding that will be spent will be used to benefit low to moderate-income individuals, seniors, and persons with special needs throughout suburban Monroe County.

**Geographic Distribution**

<b>Target Area</b>	<b>Percentage of Funds</b>
Monroe County Service Area block groups	100
Brighton	
Gates	
Henrietta	
Ogden	
Parma	
Penfield	
Perinton	
Rush	
Sweden	
Brockport	
Churchville	
East Rochester	
Fairport	
Hilton	
Pittsford	
Scottsville	
Webster	
Chili	
Clarkson	
Hamlin	
Mendon	
Riga	
Wheatland	
Honeoye Falls	
Spencerport	
Village of Pittsford	

Target Area	Percentage of Funds
Village of Webster	

**Table 5 - Geographic Distribution**

**Rationale for the priorities for allocating investments geographically**

Funding was provided to municipalities for infrastructure improvements if they applied for funding and if the projects are in low-mod census areas. Public services activities were funded at a rate not to exceed 15% of the annual CDBG allocation, including program income. The funds proposed for Planning and Administration, including program income will not exceed 20% of the annual CDBG amount, 10% of the annual HOME amount, and 7.5% of the ESG amount.

**Discussion**

## Affordable Housing

### AP-55 Affordable Housing - 91.420, 91.220(g)

#### Introduction

Through the CDBG and HOME funds, Monroe County administers the Home Improvement Program (HIP), which provides income eligible homeowners with grants and/or loans for needed repairs, thereby maintaining affordability. Home funds are utilized to provide gap financing for the development of affordable rental and homebuyer housing, including down payment and closing cost assistance for homeownership opportunities to low-mod income individuals, families, seniors, and individuals with developmental and intellectual disabilities.

<b>One Year Goals for the Number of Households to be Supported</b>	
Homeless	0
Non-Homeless	2
Special-Needs	0
Total	2

**Table 6 - One Year Goals for Affordable Housing by Support Requirement**

<b>One Year Goals for the Number of Households Supported Through</b>	
Rental Assistance	35
The Production of New Units	0
Rehab of Existing Units	60
Acquisition of Existing Units	2
Total	97

**Table 7 - One Year Goals for Affordable Housing by Support Type**

#### Discussion

## **AP-60 Public Housing - 91.420, 91.220(h)**

### **Introduction**

The Rochester Housing Authority (RHA) and the Village of Fairport Urban Renewal Agency (FURA) manages the two publicly administered Section 8 Programs in Monroe County. RHA has developed its Annual, Five Year and Strategic Plans. The Strategic Plan action items have become part of the overall Annual and 5-Year Plan. RHA has submitted its Annual/5-Year Plan to HUD and will be updating its Strategic Plan. Once complete, it will be included in RHA's Annual/5-year Plan. Established in 1955 as an independent public corporation by New York State Public Housing Law, RHA serves more than 27,000 lower-income residents and program participants in the five-county Greater Rochester area, by providing quality comfortable living and services for people with limited incomes. Approximately 20% of total residents served reside in the 2,200+ RHA public housing units. Public Housing Units available for: Over 50 & Disabled: Danforth Tower East/West, Glenwood Gardens, Hudson Ridge Tower, Kennedy Tower, and Parliament Arms. Disabled & Over/Under 50: Lake Tower, Lena Gantt Estates, Lexington Court, and University Tower. Family Housing: Bay-Zimmer Townhouses, Bronson Court, Federal Street Townhouses, Harriet Tubman Estates, Holland Townhouses, Lena Gantt Estates, Lexington Court, and Parkside Apartments. Enriched Housing: Danforth Tower East, Hudson Ridge Tower, Johnathan Child. Single, Double, and Multiple Unit Scattered Site Homes. Resident Services: Family Self-Sufficiency (FSS) is a voluntary employment and savings incentive program designed to assist families in becoming economically independent and self-sufficient. Supportive services in the program include homeownership, training for jobs, education, and life skills to help families reach their goals in 5 years. Service Coordination for RHA Elderly and Disabled Residents, including health and wellness, money and employment, transportation and more. The FURA Section 8 program territory encompasses the town of Macedon within Wayne County and the eastern part of Monroe County including the town and villages therein, of Irondequoit, Webster, Penfield, East Rochester, Brighton, Henrietta, Pittsford, Perinton, Mendon, and Rush. FURA administers eighteen (18) Section 8 Project-Based units, ten (10) at Crosman Senior Apartments and eight (8) at Fairport Apartments. Current program demographics through FURA's Section 8 program reflect a total of 311 elderly and disabled families and 99 other eligible households (i.e.: non-disabled families and 2-adult households). The average annual total household income of participants in FURA's program is \$17,310. Approximately 239 families are at or below 30% of the Area Median Income (AMI), 125 are between 30-50% of the AMI and the remaining families are at or above 50% of the AMI. Each year, FURA assists 65-75 new families with 75% of those below 30% of the area median income. FURA is authorized to administer 497 vouchers.

### **Actions planned during the next year to address the needs to public housing**

RHA is continuing its initiative to "Change the Face of Public Housing" by renovating and constructing new units that residents will be proud to call home. RHA will continue its "Beautification Initiative" for all its public housing developments that will not only enhance curb appeal but the rest of the property as well. RHA will continue to provide quality affordable housing and services for its residents. RHA meets with resident councils, resident Commissioners, staff and neighborhood associations to address

needs and discuss upcoming projects. RHA takes all suggestions and recommendations from these sources into consideration when preparing the five-year Capital Improvement plan. Due to ever changing conditions, items are prioritized and can fluctuate within the plan from year to year. There are currently multiple projects in various stages, and more are being planned for the upcoming year. RHA will also undertake roof replacement, driveway resurfacing, and porch restoration/replacement projects at several scattered site properties throughout the year. RHA has been awarded a NYS Preservation Opportunity Program grant to develop plans for the preservation of public housing and is currently working with consultants. Strategies are being developed to preserve Harriet Tubman Estates, Lena Gantt, Holland Townhouses, Bay-Zimmer Apts, and scattered sites in the CONEA and Market View Heights neighborhoods. Physical needs assessments and environmental testing of other public housing properties is also being done with the grant funds. RHA is advancing the redevelopment of its public housing sites; Federal Street Townhouses/Scattered Sites Rental Assistance Demonstration (RAD) project, Parliament Arms, Fairfield Village and Glenwood/Fernwood. These redevelopment projects may increase or decrease the number of available public housing units with the goal of increasing the number of quality affordable housing units. RHA has room in its Faircloth limit to add public housing units to its portfolio. RHA was awarded Low Income Housing Tax Credits (LIHTC) and other sources of funding to redevelop Federal St. Townhouses/Scattered Sites with construction beginning later this year. RHA may also issue its own bonds for development activities and acquiring property. RHA intends to apply for NYS funding opportunities for development and capital improvement activities. RHA will be applying to New York State Housing and Community Renewal's Public Housing Preservation Program (PHP) when the NOFA is available. PHP is a partnership among HCR, HUD, Federal Public Housing Authorities (PHAs) outside New York City, and collaborating with private for profit and non-profit developers to address the needs of these properties and assist RHA in completing their plans to ensure the long-term sustainability of existing public housing units. HCR will coordinate with RHA and HUD to develop and implement a five-year strategy to preserve public housing units, address their need for capital improvements, and ensure their continued affordability. RHA intends on using Capital Funds to further its mission of "Changing the Face of Public Housing." RHA will identify sites through a physical needs assessment process and prioritize the most strategic use of its Capital Funds to preserve its Public Housing stock. Capital Funds may also be used for development activities and will be used to renovate Scattered Site properties and prepare identified properties for homeownership. RHA will participate in task forces and initiatives to address the housing quality, homelessness, and emergency housing needs in the community.

### **Actions to encourage public housing residents to become more involved in management and participate in homeownership**

RHA is committed to continuously improving communication between management and its residents and program participants and continues to work with area partners to provide services. RHA has created a new position, Public Participation Coordinator, to increase resident participation in self-sufficiency program offerings. RHA will continue to develop and promote its Section 3 program, resident councils and advisory board. RHA's Resident Services department will continue to assist with resident

needs and actively engage in homeownership opportunities and self-sufficiency program development. RHA intends to perform physical needs and environmental assessment of its public housing scattered site units and determine which single-family units will be designated for homeownership. Current residents will be given first option to purchase the home. RHA may use capital funds and/or operating reserves to renovate designated public housing scattered site homes prior to being offered for homeownership. RHA has implemented a homeownership plan that will include HUD's Section 32 Homeownership. This comprehensive plan outlines the requirements and guidelines of the program. RHA has 7 public housing residents to purchase their public housing home. RHA is completing its Special Application Center submission to continue the process. RHA has surveyed additional public housing residents in an effort to create a pipeline of Section 32 homeowners. Thus far, 39 responses have been submitted and the Resident Services department will meet one on one with each resident who wishes to purchase their home and create a path to successful homeownership. In addition to the Plan, RHA has developed a post homeownership program to assist families in maintaining their homes and ensuring homeowners that they have somewhere to go for assistance when they need it. RHA intends to increase utilization of homeownership vouchers and increase outreach efforts. RHA intends to seek partners who will grow and assist family self-sufficiency initiatives. RHA intends to participate in the Envision Center demonstration which offer HUD-assisted families access to support services that can help them achieve self-sufficiency through a centralized hub of supports in the following four pillars: (1) Economic Empowerment, (2) Educational Advancement, (3) Health and Wellness, and (4) Character and Leadership. RHA plans to improve use of its community-based Computer Labs with faster service, new equipment, and utilize Community Service hours to monitor computer labs. RHA may utilize unused (Tenant Participation Funds) Per Unit Monies (PUM) of developments without an active Resident Council to create a Youth Employment and Education Program (YEEP) for public housing residents. RHA intends to start an annual scholarship for youth and adults to promote self-sufficiency. RHA plans to create scholarship opportunities for public housing residents and HCVP Participants utilizing partnerships and sponsoring various activities to obtain funds, including grants and unused resident participation funds. RHA plans to create a building trades pre-apprenticeship program by partnering with various groups who will provide hands-on training for public housing residents and HCVP Participants. RHA will explore and create new partnerships and seek funding opportunities to create a Youth, Sports and Fine Arts Chapter to enhance the outreach opportunities for youth to participate in routine and non-traditional leisure activities including but not limited to golf, swimming, basketball, dance, performing arts, scuba diving, football, tennis, writing and much more. RHA will partner with the Boy scouts and work together to bring scouting opportunities to its families. RHA intends to create business opportunities for resident councils and/or the Jurisdiction-wide Resident Council or individual residents.

**If the PHA is designated as troubled, describe the manner in which financial assistance will be**

## **provided or other assistance**

This is not applicable since RHA has never been designated as a troubled Public Housing Authority (PHA).

## **Discussion**

RHA continues to perform a comprehensive physical needs assessment on all of its public housing properties in 2022. There will be an emphasis on prioritizing single family units for homeownership. The work performed will include landscaping, paving, HVAC upgrades, and interior and exterior improvements. RHA will be working to reduce unit turnaround time for vacated public housing units so that they can be filled with applicants from our wait list. RHA is in the process of planning energy saving projects such as lighting, water conservation, and more efficient HVAC systems that will improve the quality of life for residents. The RHA Resident Services Department is also working hard to partner with other agencies that can assist residents in self-sufficiency initiatives and goals. Homeownership, training, employment, life skills and financial education are a focus in the upcoming year. RHA has been awarded HUD Family Self-Sufficiency (FSS) and Resident Opportunity & Self Sufficiency (ROSS) grants and contributes additional funds to further its mission of assisting residents and participants in becoming self-sufficient. RHA continues to work with residents and other stakeholders to prepare for this grant and other grants that become available. RHA's grant writer consultant will assist with the application(s). If awarded RHA would replace public housing units and create new homes for purchase through the home ownership program.

FURA awarded 28 Project Based Vouchers (PBV) this year to two local housing projects. Construction on those projects is slated to begin sometime in the spring/summer of 2022. Both projects are proposed to assist low-income seniors in Henrietta and Penfield.

PBV projects are beneficial to communities that have a shortage of safe and affordable rental housing. FURA's service area consists of a very tight housing market and increasing the PBV units would directly benefit participants as they would be able to secure housing quickly. Increasing the availability of rental units to participants of our program is an important priority for FURA. PBV funding can be awarded to developers who develop new units or rehabilitate existing housing. Working collaboratively with developers will help to increase the pool of safe and affordable housing units as well as help to preserve existing housing stock. Incentives to developers include financial security from the long-term housing contract with FURA. In addition, in higher cost areas, some projects may be eligible for higher subsidies for PBV units than regular Tenant Based Vouchers. FURA staff remains devoted to moving forward with future plans to continue serving clients well. FURA has gained new technology, making it a more efficient office environment. FURA remains committed to recertifying households in the comfort of their own homes, as it reflects unparalleled commitment to customer service.



## **AP-65 Homeless and Other Special Needs Activities - 91.420, 91.220(i)**

### **Introduction**

Monroe County will continue to work with the Continuum of Care to coordinate services to the homeless and to provide outreach and other services, emergency shelter, transitional housing and permanent supportive housing to persons experiencing homelessness and/or with special needs. Coordinated Entry (CE) and the Housing First model are the primary tools that will end chronic homelessness. Through CE, the Chronically Homeless move to the top of the prioritization list for placement into permanent supportive housing. All CoC and ESG programs incorporate housing first principles into their programs to reduce barriers to accessing housing and to reduce terminations from programs. In 2016, the Rochester/Monroe County CoC reached functional zero toward ending veteran homelessness. Functional zero status does not mean that veterans won't become homeless; but it means that the CoC now has sufficient resources to get veterans into appropriate housing quickly and that veterans remain stably housed. The CoC, City, and County continue to partner with the Veterans Administration, Veterans Outreach Center, and other organizations serving veterans to ensure current resources are maintained and support new housing units targeted to veterans. To end homelessness for families and dependent children, the primary strategies being utilized are diversion and rapid re-housing. Strategies to end homelessness for unaccompanied youth include outreach, transitional housing and a rapid re-housing dedicated to young adults (ages 18 – 23). The CoC will continue to pursue additional resources for homeless youth through HUD's Youth Homelessness Demonstration Grants. Transitional housing, rapid re-housing programs and permanent supportive housing programs serving the re-entry population are proving to be successful in assisting this population with accessing and remaining stable in permanent housing. The Coordinated Entry system fully implemented in January 2018 aids in reaching these goals by employing diversion strategies to prevent entry into the homeless system and vulnerability assessments to ensure that those with the highest needs are prioritized and are referred to the programs that will best meet their needs. Consistent with the 2012 Homelessness Resolution Strategy, Rochester will: Continue to implement diversion as the first response to a housing crisis; Emphasize a rapid rehousing/housing first approach for the entire system; Increase Rapid Rehousing and Permanent Supportive Housing (PSH) resources; Use Progressive Engagement in Providing Services; improve practice and capacity in PSH programs by targeting PSH to people with the highest needs based on the vulnerability assessment tool, building PSH provider capacity, integrating employment services into PSH programs, and implementing a "Moving On Strategy" from PSH interventions; Implementing data-driven decision-making and evaluation; and ensuring leadership and accountability.

### **Describe the jurisdictions one-year goals and actions for reducing and ending homelessness including**

#### **Reaching out to homeless persons (especially unsheltered persons) and assessing their**

## **individual needs**

Person Centered Housing Options (PCHO) and the Rapid Engagement Demonstration (RED) Team will continue to identify and engage the unsheltered homeless. PCHO, RED and MC Collaborative, Veteran Administration regularly visit soup kitchens, libraries, and public places that unsheltered homeless adults frequent. Youth street outreach workers will continue to regularly engage homeless and at-risk youth on the street, recreational centers, and other locations that youth frequent. The objective is to engage with the unsheltered homeless and link them with housing, services, and mainstream benefits. Additional outreach is conducted by Monroe County DHS during the Code Blue season, when temperatures fall below 32 degrees. Any person requesting emergency shelter when the temperature is below 32 degrees must be placed in shelter or if there are no shelter beds available, in local hotels. Youth service providers will continue to utilize street outreach workers who use a mobile unit to conduct ongoing, regular outreach efforts with homeless and at-risk youth, including LGBT youth. Services include medical screenings (including HIV testing), condom distribution, and linking youth to community-based services and income streams. Homeless youth who agree to placement are transported to youth emergency shelters. Veterans outreach workers visit shelters, soup kitchens, and other locations in an effort to identify homeless veterans and link them to the VA and community-based services. Street outreach is conducted to engage the unsheltered homeless in the locations where they are known to congregate (e.g., parking garages). Specialized Office of Mental Health (OMH) outreach workers connect with homeless persons experiencing serious mental and/or substance abuse issues. Outreach workers who speak Spanish and other languages participate in these efforts.

## **Addressing the emergency shelter and transitional housing needs of homeless persons**

Monroe County works with the CoC and its partners to carry out outreach and services to homeless persons and to provide emergency shelter for all homeless populations; homeless youth, veterans, victims of domestic violence, persons with chemical dependency and/or mental health issues and other homeless individuals and families. Transitional housing is provided for homeless youth, veterans, and re-entry populations many of whom have chemical dependency and/or mental health issues. The emergency shelter system was greatly impacted by COVID-19. Shelters were decompressed (census reduced) in late March of 2020 to ensure social distancing guidelines could be followed by shelters. This was accomplished by placing those who would be most vulnerable to COVID based on age and/or chronic health conditions into hotels where they would have their own rooms. By the end of 2021, most shelters were back at their optimum capacity and shelter occupancy is approaching pre-COVID numbers.

**Helping homeless persons (especially chronically homeless individuals and families, families with children, veterans and their families, and unaccompanied youth) make the transition to permanent housing and independent living, including shortening the period of time that individuals and families experience homelessness, facilitating access for homeless individuals and families to affordable housing units, and preventing individuals and families who were**

## recently homeless from becoming homeless again

To end homelessness among households with dependent children, the CoC is utilizing Rapid Rehousing (RRH) programs. RRH provides short term rental assistance and case management services to move families from shelter to permanent housing quickly and ensure housing stability. It is also providing diversion assistance for those who have a viable alternative to a shelter but require some support. The CoC plans to increase the number of homeless households with children assisted through RRH projects by working with TH projects serving families to help them restructure using a RRH model and by soliciting housing organizations without such programs to create new RRH projects. ESG funding supports Coordinated Care Services, Inc.'s Rapid Rehousing program (RRP) that responds quickly to households referred through coordinated entry, secures appropriate PH, and uses an array of mainstream benefits and supports to maximize resources, increase housing stability and reduce repeat episodes of homelessness. The RRP is being expanded to serve as a forum for the broader implementation of a local RRH system. RRH projects have sought and been awarded funding from other sources (e.g., NYS OTDA, and HUD CoC Funding), and this effort will continue. The needs of domestic violence victims, including their families, will continue to be broadly addressed. The Rochester/Monroe County Domestic Violence Consortium, with 50-member organizations from human services and the legal system, promotes a coordinated community response to domestic violence. In addition, staff of housing providers who serve domestic violence victims are trained in trauma-informed care and safety planning. Willow DVC serves people who are victims of domestic violence (or at risk) along with their children, offering counseling, education, and a secure shelter, whose location is not publicly identified. A 24-hour hotline provides information on housing and services for domestic violence victims. Willow DVC has stringent policies to ensure the safety and privacy of its clients, and names and other identifying data are not entered into HMIS. YWCA, LAWNY and Willow operate a rapid rehousing project for households experiencing domestic violence. For the past several years, there has been a DV Bonus Project opportunity as part of the annual HUD CoC funding competition. A Rapid Rehousing project was submitted but not selected for an award. The Center for Youth (CFY) Services Center House provided emergency housing and services for unaccompanied homeless youth, ages 12-17. CoC will continue to offer a range of outreach, emergency, and transitional housing and support services are available through CoC and other funding resources. CFY, a RRH program for Transition Age Youth (ages 18 – 24) in our community. Youth providers have a common intake form, work together closely, and meet on a monthly basis to ensure that homeless youth have access to safe housing and services. In all cases, before a youth leaves a program, the youth is linked to a family member or other responsible, supportive adult. Youth providers will continue to work with Monroe County Office of Mental Health (OMH) to ensure access to mental health services and ease transition from the youth to the adult mental health system. Youth ages 16-17 and 18-24 will be targeted separately and offered age-appropriate services, while youth as young as 12 will also be served. Genesis House, an emergency housing program for older homeless youth, ages 17-20, closed its doors due to insufficient funding. This was the only emergency housing program dedicated to this population. Homeless youth who are 18-20

are able to access the adult shelters.

**Helping low-income individuals and families avoid becoming homeless, especially extremely low-income individuals and families and those who are: being discharged from publicly funded institutions and systems of care (such as health care facilities, mental health facilities, foster care and other youth facilities, and corrections programs and institutions); or, receiving assistance from public or private agencies that address housing, health, social services, employment, education, or youth needs.**

Youth being discharged from foster care or other institutional settings typically return to their family of origin or another responsible family member or adult. When no such adult can be located, the youth is placed in a community program specifically designed to prepare youth for independent living. The CoC will continue to educate homeless providers about the importance of ensuring that youth are not discharged into homelessness. Shelters have been instructed to immediately contact the MC DHS to report the failed discharge plan if a youth is attempting to access homeless services. The youth is then connected to a caseworker who attempts to re-unite the youth with his/her family or other responsible adult and link him/her to appropriate services. If such a re-uniting is not possible, the youth is referred again to a community program that prepares youth to transition to independent living.

Hospitals have been encouraged to not discharge people with no available housing after hours or weekends so that they can first go to MCDHS for assessment and placement into a shelter that can best meet their needs. When this is not possible or patient leaves against medical advice, hospital social work staff have been provided with information on local emergency shelters (e.g., physical layouts, staffing, hours open) so a referral is made to the shelter that can best meet the person's needs. Hospital staff call the shelter to confirm a bed is available, any required follow-up care is communicated to shelter staff, and the patient is provided with a sufficient supply of medication. Three emergency shelters (12 beds) have beds dedicated for persons who are being discharged from hospitals, due to health or mental health who are homeless which provide additional support through the use of peers and Health Home Care Managers to transition to and stabilize in permanent housing.

Inpatient facilities licensed or operated by the NYSOMH and NYSOASAS are encouraged to refer individuals to housing consistent with the level of care required by the patient and to not discharge patients until a comprehensive discharge plan is in place. Prior to discharge, individuals in need of supervised housing, and who agree to a referral, are referred to the Monroe County Single Point of Access (SPOA). The SPOA facilitates housing assistance for eligible individuals and connects persons to mental health care coordination services. Through HSN, the CoC will continue to educate stakeholders about the primary providers of licensed mental health residential beds (DePaul Community Services, East House, Housing Options Made Easy, Rochester Psychiatric Center), intensive case management programs (Strong Memorial Hospital, Rochester General Health System, Unity Health System), and care

coordination services (ACT Team, Project Link, MICA Net).

Ex-offenders are most frequently discharged to their families or to independent living under the supervision of parole. NYS Parole has contracts with several community agencies to place ex-offenders when no other housing can be located (e.g., Salvation Army Adult Rehabilitation Center, Grace House, and DuBois Re-Entry Program). The State is implementing a pilot project in Monroe County for effectively linking eligible individuals from this population to Health Homes, which will provide enhanced care management, ensuring that enrollees are linked to housing and social services supports. The CoC Team and the Monroe County Re-Entry Task Force will continue to work closely together, utilizing common members, to assist ex-offenders to successfully transition back into the community. Linking ex-offenders to mainstream resources will reduce the number of ex-offenders from entering the homeless system. Delphi, the umbrella agency for the Monroe County Re-Entry Task Force operates a very successful RRH program for persons who are released and have no permanent housing identified.

## Discussion

**Con't from Helping homeless persons** The primary strategy to address the needs of the chronically housing population is permanent, supportive housing (PSH). PSH provides a deep rent subsidy (participant pays 30% of income for rent) and on-going case management and support services to participants who have a long term disability and who have been homeless for more than one year, or have had four or more episodes of homelessness totaling at least one year in the past three years. There is no limit on the length of stay in PSH. Housing First principles have been adopted by all of the PSH programs in the CoC to reduce barriers to accessing housing. Chronically homeless persons are prioritized for entry into all PSH programs when openings occur. Two small PSH programs for the Chronically Homeless opened in 2021, providing a total of 15 units. These programs are using Coordinated Entry for referrals and participating in HMIS.

The Veterans Administration (VA) and the Veterans Outreach Center (VOC) will continue to exclusively serve homeless veterans in the CoC geography. Both the VA and VOC provide emergency and transitional housing options for veterans. Both also partner with the Rochester Housing Authority (RHA) to provide PSH options for Veterans. Referral to the PSH programs come directly from the VA and/or through Coordinated Entry. VOC and Eagle Star have recently opened affordable, supportive housing for veterans that have been funded through the Empire State Supportive Housing Initiative (ESSHI).

**Con't from Helping low-income individuals and families avoid becoming homeless** To reduce the time in Emergency Shelter (ES) or Temporary Housing (TH), the CoC has adopted a Housing First approach, which has resulted in eliminating many preconditions (e.g., sobriety, minimum income threshold) that can be barriers to accessing safe, affordable permanent housing. In addition, ESG funds have been used for rapid rehousing efforts, especially for families, to move them quickly to PH and reduce future episodes of homelessness. Data on the length of time that homeless individuals and families spend in CoC and ESG-funded ES, TH, and Supportive Housing (SH) programs are included in HMIS and will be used to track changes over time. Non-HUD funded projects are represented among the over 70

community agencies in the HSN, where members are educated on best practices and tools that can be used to reduce the length of time individuals stay homeless. To reduce the extent to which individuals and families leaving homelessness experience additional homeless episodes, the CoC will utilize prevention, diversion, and short-term rental assistance, and arrears payments. The Monroe County DHS Diversion Unit will continue to assist those at risk of homelessness with payments for such costs as back taxes, mortgage payments, auto repairs, and tools/uniforms for jobs. Returns to homelessness are also decreased as the result of less stringent compliance demands for participants, automatic renewals of leases, and ensuring that discharges are in accordance with fair housing requirements. Data in HMIS is used to determine if and when individuals and families leaving TH, RRH, and PSH experience another episode of homelessness in those cases where either they exit to homelessness or they exit to permanent housing, but subsequently re-enter the homeless system in the CoC geography. To improve the housing stability of persons in permanent supportive housing, the CoC will utilize the local Coordinated Entry System to ensure that households are directed to the housing and services that will best meet the needs of that household. Special attention is given to increasing access to mainstream supportive services and enhancing case/care management options to ensure effective integration of homeless housing & community-based services and supports.

## **AP-75 Barriers to affordable housing -91.420, 91.220(j)**

### **Introduction**

Monroe County is working to expand access to and knowledge of County administered community development services, such as the Home Improvement Program, first time homebuyer programs, and HOME funded affordable rental housing units by providing/conducting outreach, and by providing easily accessible information. Communities outside of the City limits struggle with vacant property issues and there are few high quality, homeownership opportunities for low and moderate-income buyers in many Monroe County communities. In addition, the supply of single family residential properties for lower income homebuyers is limited. Monroe County is continuing to fund the acquisition rehab resale program that will revitalize neighborhoods, increase inventory, and make available more affordable housing properties to first time homebuyers interested in purchasing their first home. Due to the foreclosure moratorium during the COVID-19 pandemic and the increased cost of properties, low-income homebuyers have had to compete for the purchase of homes with those who do not have funding or regulatory restrictions in the purchase of their home. Monroe County vacant properties are harder to purchase when competing/bidding with landlords who are purchasing properties for renters with no income restrictions. The need for affordable housing is especially acute for families and seniors in Monroe County. Local housing problems could be solved with more single family or family rental housing.

Monroe County is aware of the fact that nationwide, 61.7% of fair housing complaints were based on disability discrimination in 2019. During the COVID-19 pandemic, 31% of COVID-19 deaths in the US were older adults, staff, and caregivers in institutional settings as of June 2021. Nationwide, less than 1% of housing units are available to people who use a wheelchair full time. The impediments to available housing nationwide are also concerning in Monroe County because the CDC has found that adults with disabilities are twice as likely as those without disabilities to have inadequate transportation.

Monroe County will continue to work with partners in local governments, public housing providers, local developers, as well as community partners to help address housing needs of community members and promote and market affordable housing.

### **Actions it planned to remove or ameliorate the negative effects of public policies that serve as barriers to affordable housing such as land use controls, tax policies affecting land, zoning ordinances, building codes, fees and charges, growth limitations, and policies affecting the return on residential investment**

The Update to the Analysis of Impediments (AI) indicates that discrimination continues to be the major negative factor in locating housing for seniors and families. The Plan is a multi-year plan designed to address barriers to housing in Monroe County for low-income families and individuals and members of protected classes. Monroe County will work with municipal, developers, and community partners

through outreach and engagement to promote and market affordable housing.

**Discussion**



## **AP-85 Other Actions - 91.420, 91.220(k)**

### **Introduction**

#### **Actions planned to address obstacles to meeting underserved needs**

Housing costs remain a burden to low-moderate income families as well as availability of units. Demands for resources continue to increase due to funding regulations and restrictions. Monroe County will continue to focus on: 1) creating and maintaining affordable housing stock; 2) continuing the Home Improvement Program to assist low income homeowners maintain their home and pay for necessary repairs; 3) continue to fund programs that assist job creation and retention and business expansion; 4) increase efforts to expand Section 3 new hires by increasing coordination with the City of Rochester, Rochester Housing Authority, RochesterWorks, Monroe County Human Services-Employment Assistance Division to assist contractors in finding and hiring low income individual and contracting with Section 3 businesses; 5) maintaining funding for the acquisition rehab resale program to increase housing stock and making available more affordable housing for first time homebuyers in suburban Monroe County.

In early 2022, the County of Monroe Industrial Development Agency has adopted a new Housing Incentives policy. All project applications for market rate housing must include an affordable set aside of at least 10% of the total square footage of the residential area of the building, including the associated common area. If the project is located in a blighted or highly distressed area, then the Agency in its sole and absolute discretion may waive the set aside requirement. This new policy will increase available affordable rental housing for low-moderate income residents.

#### **Actions planned to foster and maintain affordable housing**

Monroe County will: Create, maintain, and rehabilitate affordable housing stock; prioritize projects in communities where there is currently no affordable housing; and continue to fund public works/infrastructure improvement projects in low and moderate income areas. Monroe County's partnership with the Rochester Housing Development Fund Corporation (RHDFC)/Greater Rochester Housing Partnership (GRHP) has worked to expand the acquisition rehab resale program in suburban towns and villages. This program has, and will continue to increase affordable housing inventory and make available more single family units for homeowners interested in purchasing their first home in suburban towns and villages throughout Monroe County where housing stock is low and competitive for First time homebuyers.

This year, the GRHP staff have been awarded additional grant funding from a local bank to make available up to \$40,000 for three (3) properties in the County's acquisition rehabilitation resale program, which will offset the total development cost per project and allow Monroe County to maximize HOME

funds to purchase additional properties to rehab and resale to income eligible homebuyers.

### **Actions planned to reduce lead-based paint hazards**

Monroe County will continue to enforce actions specific to its housing programs in lead-based paint hazard identification, disclosure, and reduction. These activities are expected to make up half of the repairs undertaken this year. Federal requirements for lead-safe work practices and contractor certifications have substantially increased the cost of home repairs, making it more difficult to accomplish steps necessary to ensure health and safety related deficiencies are corrected. All properties purchased through the First-Time Homebuyer Program must have inspections for lead-based paint hazards prior to final approval of applications for assistance. Purchase subsidies are issued only after receipt of inspection reports indicating that no lead-based paint hazards are present at the time of purchase. Proway Management, a NYS Certified Women/Minority Owned Business, Rochester based lead paint testing firm provides \*risks assessment and clearance inspection services for the Home Improvement program participants. The Monroe County Department of Public Health (MCDOPH) is the lead agency in regard to childhood lead poisoning prevention. The MCDOPH received a \$766,555 Healthy Neighborhoods grant from the NYSDOH, which ran for five years starting April 1, 2014 through March 31, 2019. The grant was extended on a yearly basis from April 2019-March 2020, April 2020-March 2021, and again from April 2021-March 2022 with a yearly award of \$141,644. Early in 2022, it was announced that the Health Neighborhood Grant will be funded for the next 5 years at \$162,003 per year for a total of \$810,015. The focus of the grant is primary prevention for Tobacco Control, Fire Safety, Injury Prevention, Lead Prevention, Indoor Air Quality, General Housing Conditions and Asthma Control. Each year, Outreach workers will perform approximately five hundred (500) initial visits in zip codes 14605, 14608, 14609, 14611, and 14621, which have well documented public health and housing issues. Additional zip codes may be added during this grant round. A total of 125 follow up visits are also anticipated. Topics covered will include lead poisoning prevention (deteriorated paint, dust, cleaning and nutrition), fire safety issues, carbon monoxide, general sanitation issues, code violations, electrical problems, tobacco cessation, general home safety, and controlling asthma triggers. Referrals will be made to MCDOPH programs and other agencies when problems are identified. During this grant round, the HNP grant manager intends to expand referrals made to outside agencies/programs that can provide additional assistance in home environmental issues, especially in relation to asthma and home repair/improvement. Lead Safe Work Practices Training - After April 2010, the new federal law requires contractors to become EPA Lead Certified Renovators. The new Lead Renovation, Repair and Painting rule (RRP) affects anyone who is paid to perform work that disturbs paint in housing and child-occupied facilities built before 1978. This would include residential rental property owners/managers, general contractors, maintenance personnel, and trade contractors, including HVAC, painters, plumbers, carpenters, and electricians. All persons conducting lead hazard control work that are ordered in a County "Notice and Demand," must successfully complete an approved EPA Renovation, Repair & Painting initial 8-hour training. Prior to the commencement of lead hazard control work the recipient of

the “Notice and Demand” and/or property owner must submit proof of this training to the MCDOPH for all such persons. The Cornell School of Industrial Relations is the EPA-certified training provider and has provided RRP training for Monroe County and surrounding counties per contract with Monroe County and free of charge to class attendees since 2005.

### **Actions planned to reduce the number of poverty-level families**

Rochester Monroe Anti-Poverty Initiative (RMAPI) coordinated efforts to access the initial funding to establish two adult mentoring programs. Bridges to Success and Family Independence Initiative (FII). FII completed its first funding cycle and successful program, meeting its target outcomes of increased employment and earned income. Bridges to Success finished Cohort 1 last year and because it had better outcomes than FII was extended into a second cohort which is still in full operation. Bridges to Success in being run in partnership with Action for a Better Community serving 100 participants.

Monroe County Department of Human Services and Rochester Rehabilitation are partnering in a program "Paths to Empowerment." This program will support individuals who are making the transition from public assistance to self-sufficiency. The program will coordinate existing resources and make linkages to community resources to maximize success for persons working toward employment retention.

The CoC is focusing on increasing income for all participants in CoC funded homeless programs. Activities include ensuring participants are receiving all public benefits that they are eligible for, creating a SOAR program that will assist participants with long term disabilities in securing SSI/SSDI benefits, linking participants to employment and educational services in the community, and providing financial literacy services. While linking people to public benefits may not always lift a household out of poverty ensuring that all households have a source of income, health insurance and adequate food resources (SNAP, WIC, etc.) is essential.

### **Actions planned to develop institutional structure**

Monroe County Community Development will continue to work collaboratively with the divisions in Planning and Development, other County departments, including the Department of Human Services, Office of Mental Health, Office of the Aging, area service providers, the City of Rochester, the Rochester Housing Authority, the Fairport Urban Renewal Agency, Partners Ending Homelessness (PEH), the local Continuum of Care, and local towns and villages to enhance services and develop a more effective system for service coordination.

Monroe County is updating its Comprehensive Plan, known as Plan Forward. The Plan when completed will address big, global concepts like sustainability, social equity, energy supply & conservation, and climate change adaptation in ways that are appropriate and unique to Monroe County, while at the same time addressing local challenges like accessibility, economic development, recreation, food

accessibility, and transportation.

### **Actions planned to enhance coordination between public and private housing and social service agencies**

Community Development staff works collaboratively with the Department of Human Services, the City of Rochester, local towns and villages, local and state public and private housing agencies, including the Rochester Housing Authority and the Fairport Urban Renewal Agency. Coordination with public and private housing and social services agencies are a priority to enhance services and maximize resources.

Monroe County has re-established The Council of Governments (COG), which is an intergovernmental body made up of the chief elected officers of the County, City of Rochester and every town and village in Monroe County. The goal of this bipartisan assemblage is communication and collaboration to enhance government services for our community.

### **Discussion**

**Actions planned to reduce lead-based paint hazards** The last class conducted was early in 2020 when the Covid-19 global pandemic hit in the United States. As of April 1st, no additional classes have been contracted and it is unclear if/when additional classes will be conducted. This is primarily due to a recent and significant budget cut experienced by the Lead Program. Funding for RRP training was previously provided by the Childhood Lead Poisoning Primary Prevention grant. Over the last 15 years nearly 4,500 individuals were trained as EPA Certified Renovators which helped build our local capacity. Individuals requiring training are currently referred to local private trainers. Local capacity for RRP training has already been demonstrated by the private sector. The EPA has recently permitted online recertification to ease the regulatory burden on individuals and businesses. Monroe County Department of Public Health, Division of Environmental Health was recently awarded \$5,175,000 to fund the now called Childhood Lead Poisoning Prevention Plus Program. This means that the funding stream for primary and secondary prevention efforts are now combined. This equates to \$1,035,000 per year and represents an overall funding decrease of about \$230,000. This will affect contractual obligations with the City of Rochester and Cornell University. The Childhood Lead Poisoning Prevention Program provides medical case management, educational and environmental intervention for children with elevated blood lead levels of >5 ug/dl and their families. Services in response to reports of elevated blood lead levels in children are mandated by NYS Public Health Law Title 10 of Article 13, Section 5 1370-1375 and Part 67 of the NYS Sanitary Code. Lead Program Public Health Sanitarians conduct environmental inspections of properties to find lead hazards in homes where children with elevated lead levels reside or spend considerable time. Any hazards found must be remediated using Lead Safe Work practices and be conducted by a Certified Renovator. All properties must achieve lead dust clearance in accordance with current \*EPA standards. A Lead Program nurse ensures that children receive follow-up testing and care from their pediatric provider. Both sanitarians and nurses provide lead poisoning prevention education to parents and guardians. The "Plus" or primary prevention component focuses on housing units with young children (<1 year old) and pregnant women. The goal is

to identify and eliminate lead and other health hazards in the home. Numerous units will be made lead safe each year and residents and owners of these properties will be educated in lead poisoning prevention and other environmental health hazards in their homes including asthma triggers, mold, pest infestation, fire safety, and carbon monoxide poisoning prevention. A MCDOPH Lead Program Public Health Sanitarian will visit these homes to conduct a lead inspection, a healthy home inspection, and provide education. Properties found to have conditions conducive to lead poisoning will be designated as an “Area of High Risk” under Public Health Law and have a Notice and Demand issued to the property owner. \*In 2020 and 2021 EPA lowered the lead hazard standard and lead clearance levels for lead in dust thus reducing lead related risk to children when lead hazard control activities are conducted. \*\*As of 10/01/2019 Medical Case Management, Education, and Environmental interventions must be conducted for all children with elevated blood lead levels of 5 or more, increasing the number of elevated children requiring case management and environmental management.

## Program Specific Requirements

### AP-90 Program Specific Requirements - 91.420, 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
<b>Total Program Income:</b>	<b>0</b>

#### 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(I)(2)

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

Monroe County leverages HOME funds with other funding secured by its housing partners to develop affordable homeownership and rental housing. Community Housing Development Organizations (CHDO) and other non-profit housing developers apply for and receive funding from

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2022

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state and local resources with leveraged support from the County's housing program, to enhance their applications with a final project that supports the goals from all agencies. Monroe County's investment of HOME funds is consistent with the forms of assistance included in 24 CFR 92.205(b).

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:

Monroe County, through the HOME program, provides conditioned grants up to \$8,000 of down payment assistance and closing cost assistance to income eligible applicants below 70% of Area Median Income (AMI), and a maximum of \$5,000 for income eligible applicants between 71-80% of AMI for First Time homebuyers to reduce the cost of purchasing their first home.

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:

Monroe County will provide the CHDO Home Investment Partnership program funds to acquire property in accordance with 24 CFR Part 92. At the time a FTHB applicant enters into a purchase agreement for an eligible property (the "Property"), they accept the amount, terms, and conditions of Buyer's Agreement. Home buyers will execute a Note and Mortgage with a Declaration of Restrictive Covenant. Language for the Declaration of Restrictive Covenant will be as follows: Title of the PROPERTY is conveyed subject to the following restrictions: The Property was acquired with the assistance of funds from Monroe County Home Investment Partnership Funds provided under 24 CFR Part 92. As a condition of the subsidy, the Property must be the Owner's Principal Residence ("Principal Residence" shall mean that the Owner must reside at the Property for any consecutive nine months in each year of the Affordable Housing Period and it must be his/her principal residence) for ten (10) or fifteen (15) years dependent on the Home Investment from the date of this deed. If the Affordable Housing Period has not expired and the Owner sells, rented, title is transferred voluntarily, or in case of bankruptcy, foreclosure, etc., or if the OWNER otherwise fails to occupy the Property as his/her Principal Residence; The Owner agrees to sell the Property to a low-income family as defined in the Regulations that will use the Property as its Principal Residence for the duration of the ten (10) or fifteen (15) year period. Documentation must be provided to Monroe County verifying the prospective buyer's income eligibility. The price at resale must (1) ensure that the Property will remain affordable to a reasonable range of low-income homebuyers, and (2) provide the Owner a fair return on investment (including the Grantee's investment and any capital improvement). These affordability restrictions and residency requirements shall terminate upon foreclosure or transfer in lieu of foreclosure. The County may use purchase options, rights of first refusal, or other preemptive rights to purchase the housing before foreclosure or deed in lieu of foreclosure to preserve affordability. Nonetheless, these affordability restrictions shall be revived according to the original terms if, during the original Affordable Housing Period, the Owner of record before the foreclosure, or deed in lieu of foreclosure, or any entity that includes the Owner or those

with whom the Owner has or had family or business ties, obtains an ownership interest in the Property.

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:

This is not applicable. Monroe County does not use HOME funds to refinance debt.

### **Emergency Solutions Grant (ESG)**

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

The County, the City of Rochester, the Continuum of Care (CoC) and HSN (a collaboration of more than 60 local homeless services, legal, primary care, mental health, substance abuse, re-entry providers and community stakeholders) have met throughout each program year to jointly plan for ESG. In keeping with past practice of providing the Emergency Shelter Grants (ESG) Program Desk Guide March 2001 to all sub-recipients, the County and City has provided sub-recipients and community providers that coordinate with them the Emergency Solutions Grant Rules and Regulations, and tools available to date including Definition of Homelessness (Criteria for Defining Homeless and Record Keeping Requirements), and Emergency Solutions Grants (ESG) Program Components and Activities. The County and the City provided sub-recipients with information about the new homeless definition and eligibility, documentation and record requirements and HMIS participation. The CoC provides HMIS licenses and training to the County's ESG sub-recipients.

Written standards are attached for Street Outreach, Emergency Shelter, Shelter Operations, Homeless Prevention, and Rapid Rehousing. These programs are eligible for ESG funding.

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

Coordinated Entry is defined by HUD as a consistent and streamlined process for accessing the resources available in the homeless crisis response system...ensuring that those with the highest need, most vulnerable households in the community are prioritized for services and that the housing and supportive services in the system are used as efficiently and effectively as possible.

The intended target population for Coordinated Entry is all households or person(s) who are experiencing homelessness or at-risk of experiencing homelessness in Rochester and Monroe County and seeking assistance from the local crisis response system, which includes prevention assistance and homeless system services. This includes single adults without children, adults



accompanied by children, families, unaccompanied youth, parenting youth, person(s) fleeing domestic violence, and veterans.

The community has agreed upon the use of a common assessment tool, known as the VI-SPDAT, to help identify the immediate needs of the household and begin directing them to the appropriate permanent housing intervention based on those needs. Interventions include Rapid Re-Housing for those; who have moderate needs and Permanent Supportive Housing, which will be reserved for those with the highest needs. Households scoring low on the assessment are identified as not needing a housing intervention and are likely able to resolve their homelessness without ongoing assistance. The VI-SPDAT score will be used as one of the determinants in the community-wide prioritization model. While it is important to have an efficient and effective process by which households can access the homeless system, it is equally important for households to be quickly exited into the appropriate permanent housing that will best meet their needs and minimize their likelihood of returning to homelessness. The CE program is currently exploring options for a new assessment tool as the VISPDAT is no longer going to be supported by its developer, Org Code.

Prioritization is a critical component of a Coordinated Entry system to appropriately exit households to permanent housing and to ensure those with the greatest needs have timely access to services. CE has developed a prioritization model based on input from community stakeholders to establish a process to effectively identify those with the highest needs and connect them to the appropriate permanent housing more quickly. CE Workgroup meets regularly to determine how households are prioritized and what information will be used to determine the way in which the list is ordered. A by name prioritization list is now in place and all TH, PSH and RRH housing providers are only permitted to accept households that are referred through the Coordinated Entry prioritization process. The work group continues to meet to make sure CE is functioning efficiently and makes revisions to policies and procedures as needed.

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).

Awards for the 2022-23 program year were based upon a 2022 Request for Proposal (RFP) process, which was jointly administered by the County and City. The notice was published by legal notice in The Daily Record and distributed via networks including those of the CoC and HSN and respectively on its established website. Awardees were chosen by a committee of County, County Department of Human Services, City, and CoC administrative board, and a formerly homeless community member. Services under this proposal cycle will run from August 1, 2022 – July 31, 2023.

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.

In compliance with Section 576.405(a) of the Interim Rule, the County has engaged persons who are currently or formerly homeless in their planning process. Formerly homeless persons are active members of the Homeless Services Network and are represented on the CoC Board and the HSN Steering Committee. Programs serving the homeless are also required to have homeless or formerly homeless persons involved in policy setting and decision making processes. Both permanent supportive housing and street outreach programs are utilizing persons with lived experience as peers to provide additional support to participants.

5. Describe performance standards for evaluating ESG.

The County utilizes the Integrated Disbursement and Information System (IDIS) to document program progress and monitor program performance on an ongoing basis. The County requires all ESG sub-recipients to submit data to HMIS as required by HUD. A Consolidated Annual Performance and Evaluation Report (CAPER) is prepared annually by the County. Each ESG funded project uses HMIS to run their CAPER and download it directly into SAGE for the County to produce that report. The CoC will assist the projects as needed to do the submission. The CAPER contains a summary of resources and programmatic accomplishments, the status of actions taken in concert with the CoC to implement the strategies contained in the Consolidated Plan, and evaluation of progress made in addressing identified priority needs and objectives.

Performance Standards are in alignment with the new measures implemented with the HEARTH Act including: reducing the duration of homelessness; reducing recidivism; reducing the number of people who become homeless; increasing employment and income; and stability in permanent housing.

## Attachments

## Citizen Participation Comments

### **Citizen Participation Comments**

Public comment period – May 5 – June 13, 2022

#### Citizen Participation

Commenter 1 – I would like to thank everyone involved in getting the new drainage pipe installed. It will be life changing for me not to have to stay up at night watching the water rise, putting all my things up and having to come home when the radar shows red over my house. It is greatly appreciated.

Response - We will forward your feedback to the County as this was made possible through the Community Development Block Grant.



## Grantee Unique Appendices

### Resale and Recapture Policy

**First Time Homebuyer Assistance Subsidy Recapture** - Monroe County, through the HOME program, provides conditional grants up to \$8,000 to income eligible applicants to reduce the cost of purchasing eligible single-family properties. Subsidy is estimated on household size, income, and closing costs. Homebuyers with Area Median Income (AMI) of 30%-70% are eligible for 100% of down payment and closing cost assistance, plus 3% of the sale price. Homebuyers with AMI of 71-80% are eligible for closing cost assistance only. Monroe County will comply with HOME regulations (24 CFR Part 92.254(a)(5) regarding recapture of HOME subsidies. At the time a FTHB applicant enters into a purchase agreement for an eligible property (the "Property"), they accept the amount, terms and conditions of the grant by execution of a Buyer's Agreement. At the time of closing for each homebuyer and upon completion of work (for Home Improvement Program projects – see below) and prior to payment of grant funds for homeowners, a note and mortgage (the "Note and Mortgage") is executed and recorded, securing the total grant funds awarded ("Affordable Housing Subsidy") for the project. This obligates the homeowner to recapture provisions if they fail to reside in the Property for the requisite affordability period. The recapture provisions in the Note and the Mortgage specify that if the Net Proceeds (defined as the sale price minus the cost of (1.) repaying the outstanding mortgage(s) encumbering the Property; (2.) the reasonable and customary closing costs; (3.) reimbursement of the homeowner's original down payment; and (4.) verifiable capital improvements made by the homeowner to the Property are insufficient to repay the full amount of the Affordable Housing Subsidy, the homeowner will repay only a pro-rated portion of the Affordable Housing Subsidy, but never more than the Net Proceeds available from the sale. This HUD approved practice will remain in effect for all future homeownership activities under the HOME program. Language from the Note and Mortgage is as follows:

1. The HOMEBUYER shall execute a Note and Mortgage securing for the COUNTY the total amount of the Affordable Housing Subsidy. The term of the Note and Mortgage shall be five (5) years from the date of this Note and Mortgage, which time shall be known as the "Affordable Housing Period".
2. The HOMEBUYER is not required to pay interest on the Affordable Housing Subsidy and is not required to repay any part of the principal during the Affordable Housing Period as long as he/she owns and resides at the Property. For purposes of this Note and Mortgage, residing shall mean that the HOMEBUYER must reside at the Property for any nine consecutive months in each year of the Affordable Housing Period and it must be his/her principal residence. Should the HOMEBUYER retain ownership and residency for the full five (5) year Affordable Housing Period, he/she shall be provided with a recordable Satisfaction of Mortgage and owe nothing to the COUNTY.

If the HOMEBUYER either sells the Property or gives up residence at the Property during the five (5) year affordable housing period, he/she shall repay to the COUNTY the full amount of

the Affordable Housing Subsidy. He/She shall make this repayment to the COUNTY within ninety (90) days of his/her sale of the Property or termination of residency at the Property.

However, if the Property is sold and the sales price minus the Net Proceeds is insufficient to repay the full amount of the Affordable Housing Subsidy, then the HOMEBUYER shall repay to the COUNTY only a pro-rated portion of the Affordable Housing Subsidy. (The HOMEBUYER's investment is defined as original down payment, principal paid on the first mortgage(s), and verifiable capital improvements, if any.) In such a case, the HOMEBUYER shall repay to the COUNTY the full amount of the Affordable Housing Subsidy less 20% for each full year the HOMEBUYER has owned and resided at the Property, but no more than the net proceeds. In any event, the HOMEBUYER must repay to the COUNTY any amount recovered from the sale of the Property in excess of his/her investment, but no more than the amount of the affordable housing subsidy.

However, if the Property is sold and the total sales price minus the cost of: (1.) repaying the outstanding mortgage(s) encumbering the Property; (2.) the reasonable and customary closing costs; (3.) reimbursement of the homeowner's original down payment; and (4.) verifiable capital improvements made by the homeowner to the Property (the "Net Proceeds"), is not enough to pay the affordable housing subsidy, then the HOMEBUYER shall repay to the COUNTY only a pro-rated portion of the affordable housing subsidy. In such a case, the HOMEBUYER shall repay to the COUNTY the full amount of the affordable housing subsidy less 20% for each full year the HOMEBUYER has owned and resided at the Property, but no more than the net proceeds.

**Home Improvement Program Subsidy Recapture** - Monroe County provides conditional grants and/or loans to eligible Home Improvement Program (HIP) participants for eligible rehabilitation activities. Monroe County will comply with HOME regulations (24 CFR Part 92.254(a)(5) regarding recapture of HOME subsidies. Participants execute a HIP agreement upon determination of eligibility and selection of a rehabilitation contractor, prior to the commencement of work. Language for Home Improvement Program Note and Mortgage (the "Note and Mortgage") are as follows:

This Note and Mortgage shall immediately become due and payable, without notice or demand, and the OWNER shall immediately pay to the COUNTY the total amount secured by this Note and Mortgage if any one or more of the following events occurs during the affordable housing period:

- a. the Property is rented, title is transferred voluntarily or by operation of law, or in case of bankruptcy, foreclosure, etc., or if the OWNER otherwise fails to occupy the PROPERTY as his/her Principal Residence. ("Principal Residence" shall mean that the OWNER must reside at the Property for any consecutive nine months in each year of the Affordable Housing Period and it must be his/her principal residence);

- b. the OWNER fails to make payments on the Loan as prescribed by Manufacturers and Traders Trust Company (the "Bank"); (if applicable)
- c. the OWNER fails to maintain as current all Property taxes;
- d. the OWNER fails to keep the Property, including all improvements, insured against loss by fire and other risks as required by Lender(s) or as required by the COUNTY;
- e. the OWNER fails to keep the Property in reasonably good repair.

**Community Housing Development Organization (CHDO) Acquisition Rehab and Affordable new Construction (Make Monroe Home) Program Subsidy for Owner Occupants – Resale** (new program) Monroe County will provide the CHDO Home Investment Partnership program funds to acquire property in accordance with 24 CFR Part 92. At the time a FTHB applicant enters into a purchase agreement for an eligible property (the "Property"), they accept the amount, terms, and conditions of Buyer's Agreement. Home buyers will execute a Note and Mortgage with a Declaration of Restrictive Covenant. Language for the Declaration of Restrictive Covenant will be as follows:

Title of the PROPERTY is conveyed subject to the following restrictions: The Property was acquired with the assistance of funds from Monroe County Home Investment Partnership Funds provided under 24 CFR Part 92. As a condition of the subsidy, the Property must be the Owner's Principal Residence ("Principal Residence" shall mean that the Owner must reside at the Property for any consecutive nine months in each year of the Affordable Housing Period and it must be his/her principal residence) it as a fifteen (15) years dependent on the Home Investment from the date of this deed. If the Affordable Housing Period has not expired and the Owner sells, rented, title is transferred voluntarily, or in case of bankruptcy, foreclosure, etc., or if the OWNER otherwise fails to occupy the Property as his/her Principal Residence; The Owner agrees to sell the Property to a low-income family as defined in the Regulations that will use the Property as its Principal Residence for the duration of the fifteen (15) year period. Documentation must be provided to Monroe County verifying the prospective buyer's income eligibility. The price at resale must (1) ensure that the Property will remain affordable to a reasonable range of low-income homebuyers, and (2) provide the Owner a fair return on investment and any capital improvement).

These affordability and residency restrictions shall terminate upon foreclosure or transfer in lieu of foreclosure. The County may use purchase options, rights of first refusal, or other preemptive rights to purchase the housing before foreclosure or deed in lieu of foreclosure to preserve affordability. Nonetheless, these affordability restrictions shall be revived according to the original terms if, during the original Affordable Housing Period, the Owner of record before the foreclosure, or deed in lieu of foreclosure, or any



entity that includes the Owner or those with whom the Owner has or had family or business ties, obtains an ownership interest in the Property.

*Amendment to*  
MONROE COUNTY, NEW YORK CITIZEN PARTICIPATION PLAN  
COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM

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REV 5/2022

**Note: Effective August 1, 2022, Community Development will hold all public hearings and public meetings virtually and in-person. This hybrid model will allow opportunities for those who do not have access to a computer or internet to be able to participate in Monroe County Community Development's Consolidate Planning process.**

## SECTION 1. INTRODUCTION

The Community Development Division of the Monroe County Department of Planning and Development has designed this community-wide Citizen Participation Plan to provide for and encourage citizen participation in the Community Development Block Grant (CDBG) program. This Plan is an essential element of the Department's policy for present and future community development efforts and has been developed to comply with the regulations and requirements of the CDBG program and the Department of Housing and Urban Development (HUD) and Monroe County's Consolidated and Annual Action Plan.

The primary goal of this Citizen Participation Plan is to provide all citizens of the community with adequate opportunity to participate in an advisory role in the planning, implementation, and assessment of Monroe County's CDBG program. The Plan sets forth policies and procedures for citizen participation, which are designed to maximize the opportunity for citizen participation in the community development process. Special emphasis has been placed on encouraging participation by persons of low and moderate incomes, and residents of areas where community development funds are utilized.

Citizens are encouraged to participate in all phases of the CDBG program(s) and will be provided full access to program information. However, final responsibility and authority for the development and implementation of CDBG program(s) will lie with the Department, as required by Monroe County.

## SECTION 2. SCOPE OF PARTICIPATION

The Department will make reasonable efforts to provide for citizen participation during the community development process and throughout the planning, implementation and assessment of all CDBG programs undertaken by Monroe County. Department personnel will make every effort to involve citizens in all phases of the development of community development programs.

## SECTION 3. CITIZEN PARTICIPATION CONTACT PERSON

The Community Development Manager will serve as the contact person for all matters concerning CDBG citizen participation activities. The Citizen Participation Coordinator shall be responsible for overseeing citizen participation throughout the community development process and the implementation of all citizen participation

activities and functions, except those, which may be specifically delegated to other parties by this Plan.

The specific duties and responsibilities of the Citizen Participation Coordinator shall include, but not necessarily be limited to: disseminating information concerning proposed projects and the status of current project activities; coordinating various groups which may be participating in the community development process; receiving written comments; serving as a vehicle by which ideas, comments, and proposals from local residents may be transmitted to local officials and/or program staff; and, monitoring the citizen participation process and proposing such amendments to the Citizen Participation Plan as may be necessary.

The Citizen Participation Coordinator may be contacted at (585-753-2000) during regular business hours. All questions concerning citizen participation in the community development process should be addressed to the Citizen Participation Coordinator.

#### SECTION 4. TECHNICAL ASSISTANCE

Department staff shall provide technical assistance to individual citizens and citizen groups, especially those groups representative of persons of low or moderate income, as may be required to adequately provide for citizen participation in the planning, implementation and assessment of CDBG program(s).

Such technical assistance is intended to increase citizen participation in the community development decision-making process and to ensure that such participation is meaningful. Technical assistance shall also be utilized to foster public understanding of CDBG program requirements.

Technical assistance shall be provided on request and may include, but not necessarily be limited to: interpreting the CDBG program and its rules, regulations, procedures and/or requirements; providing information and/or materials concerning the CDBG program; and, assisting low and moderate income citizens to develop statements of views, identify their needs, and to develop activities and proposals for projects which, when implemented, will resolve those needs.

#### SECTION 5. PUBLIC HEARINGS

Citizen participation in the community development process will be conducted on a community-wide basis and will actively involve the views and proposals of all citizens, especially low and moderate-income persons and residents of areas where CDBG activities are proposed or on-going.

Public hearings will be held to allow citizens to voice opinions and offer proposals concerning the development and performance of CDBG programs. Any questions that citizens may have concerning a program will be answered and their comments, suggestions, and/or proposals will be received. Citizens may also express comments and views concerning the community development process or any specific CDBG project to the governing body at any regularly scheduled meeting.

#### 5.1 Public Hearing Times and Locations

All public hearings will be held at times and locations, which will be accessible to all citizens, especially persons of low and moderate incomes, and CDBG project areas.

Public hearings will be scheduled for convenient times as determined by the Department. Public hearings may be held at any site, which, in the opinion of Monroe County, provides adequate access for citizen participation.

Hearings will normally be held at a site that is centrally located and generally accessible to all citizens and accessible to persons with disabilities. Hearings may, however, at the option of Monroe County, be held at an alternate location to be specified in the public hearing notice(s).

Hearings will be held in-person and virtually to accommodate those who may not have access to technology.

#### 5.2 Application and Award Public Hearings

A public hearing will be held during the initial stage of program development to discuss items regarding community development and housing needs, the CDBG program, and the application process. The objective of citizen participation at this stage is to provide meaningful, community-wide citizen input into the decision-making process during the assessment of community needs and the consideration of priorities and options associated with the development and submission of a CDBG application. Department staff will also entertain proposals and comments from citizens concerning community development activities at this hearing.

Citizens will be provided with information concerning the CDBG program at this public hearing. Such information shall include, but not necessarily be limited to: the goals and objectives of the CDBG program; the total estimated amount of CDBG funds available; the role of citizens in program planning, implementation, and assessment; the range of activities which may be undertaken; the process to be followed in developing a CDBG application; the application timetable(s); the schedule of meetings and hearings; and activities previously funded in Monroe County through the CDBG program.

A second public hearing will be held to inform citizens of the actual grant awards from HUD, proposed project activities to be included in the CDBG application(s) and to solicit comments from citizens concerning these activities.

Citizens attending this hearing will be provided with information concerning the CDBG project(s) proposed including, but not necessarily limited to: the project application(s) to be submitted and the applicable CDBG fund; specific project activities to be included; the location of the project activities; the approximate cost estimate for the proposed activities; the estimate of local match required; the impact of the project on low and moderate income persons; and, the approximate application submittal date.

### 5.3 Amendment Public Hearings

The Department will assure the opportunity for citizen participation during the implementation of any CDBG program(s) when significant and substantial programmatic changes to the project are under consideration.

To ensure adequate opportunity for citizen participation during CDBG programs, the Department shall hold a public hearing on all formal amendments, which require HUD approval. For "local" amendments (as defined by HUD) and changes for which HUD approval is not required, input from citizens concerning changes or amendments will be received at meetings where such changes or amendments are considered. When required, the Department will obtain Legislative approval.

### 5.4 Assessment of Performance Public Hearings

Citizens will be provided with the opportunity to comment on the performance of Department staff, consultants, engineers, and contractors, and the actual use of CDBG funds during the implementation of a CDBG program. On-going community assessment of the effectiveness of the community development process is considered essential to the success of the CDBG program.

### 5.5 Additional Hearings

Other public hearings may be held as deemed necessary by the County Legislature in order to inform citizens of community development project(s) and activities, and to solicit citizen opinions and comments. All additional hearings shall comply with the requirements set forth in this Plan.

### 5.6 Limited English Proficiency Residents

Department staff will undertake all reasonable actions necessary to allow such persons to participate in the community development process. Such actions may include the provision of an interpreter and/or the provision of materials in the appropriate language or format for persons with Limited English Proficiency.

### 5.7 Public Hearing Notice

Notice of public hearings will be published in a local newspaper at least seven (7) days prior to the hearing date. Monroe County may waive hearing notice requirements in cases where unusual circumstances justify alternative means of notifying the general public. In such situations, shorter notice may be given, and public notices posted in public places may be used in place of a notice published in the newspaper. Notice may also be given via e-mail to local governments and agencies and individuals who have either participated in or expressed interest in the CDBG program. Each notice of a hearing shall include the time, date, place, and topics and procedures to be discussed.

Notices for public hearings may be run or posted, separately or together, as may be deemed necessary by the Department.

#### 5.8 Accessibility to Low and Moderate Income Persons

The public hearing procedures outlined herein are designed to promote participation by low and moderate-income citizens, and CDBG project areas in any public hearing(s). Department staff may take additional steps to further promote participation by such groups, or to target program information to these persons should officials feel that such persons may otherwise be excluded or should additional action be deemed necessary.

#### 5.9 Accessibility to Persons with Disabilities

The locations of all public hearings as described herein shall be made accessible to persons with disabilities. The Department shall provide a sign language interpreter whenever the Citizen Participation Coordinator is notified in advance that one or more deaf persons will be in attendance. The Department shall provide a qualified reader whenever the Citizen Participation Coordinator is notified in advance that one or more visually impaired persons will be in attendance. Additionally, Monroe County shall provide reasonable accommodations whenever the Citizen Participation Coordinator is notified in advance that one or more persons with mobility or developmental disabilities will be in attendance.

### SECTION 6. PROGRAM INFORMATION

Citizens will be provided full access to CDBG program information during all phases of a CDBG project. Department staff shall make reasonable effort to assure that CDBG program information is available to all citizens, especially those of low and moderate incomes or Limited English Proficiency neighborhoods and/or CDBG project areas.

To facilitate citizen access to CDBG program information, the Citizen Participation Coordinator will keep all documents related to a CDBG program on file in the Department. Information from the project files shall be made available for examination and duplication, on request, during regular business hours.

Materials to be made available shall include, but are not necessarily limited to: the Citizen Participation Plan; records of public hearing; mailings and promotional materials; prior CDBG program applications; letters of approval; grant agreements; the environmental review record; financial and procurement records; project design and construction specifications; labor standards materials; performance and evaluation reports; other reports required by HUD; proposed and approved CDBG program application(s) for the current year or project; written comments or complaints received concerning the community development program, and written responses from Monroe



County; and, copies of the applicable Federal and State rules, regulations, policies, requirements and procedures governing the CDBG program.

In no case shall there be disclosure of any information concerning the financial status of any program participant(s) which may be required to document program eligibility or benefit. Furthermore, there will be no disclosure of any information which may, in the opinion of the Community Development Manager or the County Attorney, be deemed of a confidential nature.

#### SECTION 7. PROCEDURES FOR COMMENTS, OBJECTIONS AND COMPLAINTS

The public hearings scheduled, as described in this Citizen Participation Plan, are designed to facilitate public participation in all phases of the community development process. Citizens are encouraged to submit their views and proposals on all aspects of a community development program at the public hearings. However, to ensure that citizens are given the opportunity to assess and comment on all aspects of the community development program on a continuous basis, citizens may, at any time, submit written comments or complaints to the Community Development Manager.

Any citizen or citizen's group desiring to comment or object to any phase of the planning, development or approval of the application for CDBG funds, or to the implementation of any CDBG program, should submit such comments or objections in writing to the Community Development Manager.

Local officials shall make every effort to provide written responses to citizen proposals or complaints within fifteen (15) working days of the receipt of such comments or complaints where practicable.

This clause does not preclude a citizen from exercising any of his or her rights under the law.

Records of all comments, objections and/or complaints by citizens concerning the Monroe County's CDBG program and subsequent action taken in response to those comments shall be maintained on file in the Department and shall be made available for public inspection upon request.

#### SECTION 8. AMENDMENTS

The Department may, from time to time, modify the provisions outlined herein through amendment to this Citizen Participation Plan. It shall be the policy of the Department County to periodically review and discuss the effectiveness of this Citizen Participation Plan in allowing citizen participation in the community development process and in helping to meet the community development needs and goals identified by the citizens of Monroe County. To this end, the effectiveness of the Plan will be discussed at public hearings held in conjunction with the community development

program as discussed herein, and potential amendments to the Plan will be reviewed at this time.

Amendments to the Plan will be made as necessary.

**MONROE COUNTY**  
**Emergency Solutions Grant Program**  
**WRITTEN STANDARDS & POLICIES AND PROCEDURES**

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**MONROE COUNTY**  
**Emergency Solutions Grant Program**  
**WRITTEN STANDARDS & POLICIES AND PROCEDURES**

**SECTION I: PROGRAM DESCRIPTION**

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The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. In addition, the HEARTH Act provides grantees with the programmatic framework to maximize communitywide planning and strategic use of resources, and to improve coordination and integrate with mainstream services to increase efficiency, including services funded by other programs targeted to homeless people. Based on the Emergency Solutions Grant (ESG) regulations at 24 CFR Subpart F § 576.500 the following policies were established by Monroe County. All ESG programs must implement, at a minimum, the policies contained in this document.

Monroe County and all its sub-recipients must comply with applicable laws and guidance including the requirements of:

- Housing and Urban Development (HUD) [Docket Number FR-5474-I-01]
- Section 103 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11302)
- 24 CFR Part 91
- 24 CFR Part 576
- The HEARTH Act
- 2 CFR 200
- OMB Uniform Guidance
- HUD Eligibility Determination and Documentation Guidance
- NYS Housing Law

These funds must exclusively be used for Street Outreach, Emergency Shelter, Homelessness Prevention Assistance, Rapid Rehousing Assistance, Homeless Management Information Systems (HMIS), and Administration.

**PURPOSE OF THIS DOCUMENT**

The Emergency Solutions Grants Program Written Standards & Policies and Procedures Manual serves as a guide for Monroe County and private non-profit organizations interested in participating in the HUD administered Emergency Solutions Grant (ESG) Program.

The Monroe County Emergency Solutions Grant Program Written Standards & Policies and Procedures Manual does not replace the regulations contained in 24 CFR Part 576, and subsequent amendments, or any other applicable Federal, State and local laws, ordinances and regulations pertaining to the Emergency Solutions Grant. ESG programs must always refer to the regulations and the grant agreement in determining what is allowable under 24 CFR Part 576.

**GRANT TERMS**

Grants will begin on August 1 and end on July 31 of the following year. Grant funds unexpended during the operating period of the grant can be extended to allow for full expenditure at Monroe County's discretion.

The total amount of the fiscal year grant that may be used for street outreach and emergency shelter activities cannot exceed 60 percent of the total fiscal year grant.

#### **TARGET POPULATION**

This program is targeted to individuals and families in Monroe County who without assistance will become or remain homeless.

#### **ELIGIBLE APPLICANTS**

Eligible applicants for ESG funding are private non-profit organizations based within Monroe County who supply a service to individuals and families facing homelessness.

### **SECTION II: ELIGIBLE ACTIVITIES**

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ESG grant funding can be used for five categories; HMIS, Street Outreach, Emergency Shelter, Rapid Rehousing, Prevention Services and eligible Administration Costs.

Note: Program participants are not to be exited from ESG-funded programs and activities unless the sub-recipient can demonstrate improved and/or steady household income necessary to ensure household stability or terminate in accordance with the formal process established by the Continuum of Care.

Due to funding limitation Monroe County currently does not provide funding for any kind of real property, the sections that mention it going forward are for future reference should the decision be made to start funding it. If ESG funds are used to improve or renovate a building used for emergency shelter, the sub-grantee will comply with the minimum terms of use as set forth by 24 CFR §576.102(c). Grantees must comply with 24 CFR §576.407, other appropriate provisions of 24 CFR §576, other applicable Federal law concerning nondiscrimination and equal opportunity.

#### **STREET OUTREACH (24 CFR §576.101)**

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

For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under the homeless definition of §576.2.

#### **Eligible Costs:**

Street outreach costs are limited to those necessary to provide emergency care on the street. Staff salaries related to carrying out street outreach activities is allowable but must be approved as part of the program at the time of application or through a request to Monroe County to alter the agreement.

The eligible costs and requirements for essential services consist of:

**1. Engagement.** The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs can include the cell phone and other operating costs of outreach workers during the performance of these activities if first agreed upon by Monroe County.

**2. Case management.** The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant.

Eligible services include using the coordinated assessment system; conducting the initial evaluation, including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

**3. Emergency health services.** Eligible costs would be direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

A. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

B. *Emergency mental health services.* Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.

C. ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

D. Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances.

E. Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

**NOTE\*** ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area, Monroe County does not permit the duplication of assistance under any ESG program.

**4. Transportation.** The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

a. The cost of a program participant's travel on public transportation;

- b. If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
- c. The cost of purchasing or leasing a vehicle for the sub-recipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and

**5. Services for special populations.** ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(5) of this section. The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

**Eligible Program Participants:**

Individuals and families who are literally homeless in areas not meant for human habitation. An individual or family who lacks a fixed, regular, and adequate nighttime residence.

**EMERGENCY SHELTER (24 CFR §576.102)**

Shelter funding includes shelter operations and shelter essential services, i.e. case management.

**Eligible Costs:**

Case management related to emergency shelter, referrals to employment, healthcare, substance abuse and related services within the community. **NOTE\*** that referrals can be provided, however, direct case management for employment, health, substance abuse and other related services cannot be provided with these Emergency Shelter funds, Monroe County does encourage cross program interactions as long as assistance is not duplicated. Shelter Operations including maintenance, rent, repair, security, fuel, insurance, and utilities.

ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows:

1. **Case management.** The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:
  - Using the centralized or coordinated assessment system as required under §576.400(d);
  - Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility;
  - Monitoring and evaluating program participant progress;
  - Providing information and referrals to other providers;
  - Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and
  - Developing an individualized housing and service plan, including planning a path to permanent housing stability.

2. **Child care.** The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

3. **Education services.** When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

4. **Employment assistance and job training.** The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

5. **Legal services.** Eligible costs are the hourly fees for legal advice and representation by attorneys licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain housing. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants. Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

Fees based on the actual service performed (*i.e.*, fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the sub-recipient is a legal services provider and performs the services itself, the eligible costs are the sub-recipient's employees' salaries and other costs necessary to perform the services.

**NOTE\*** *Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.*

6. **Mental health** services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management.



Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.

7. **Transportation.** Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:

- A. The cost of a program participant's travel on public transportation;
- B. If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
- C. The cost of purchasing or leasing a vehicle for the sub-recipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and

8. **Life skills training.** The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, and using public transportation.

9. **Victim Services.** The term *victim services* means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

10. **Essential services and shelter operations.** Where the sub-recipient uses ESG funds solely for essential services or shelter operations, the sub-recipient must provide services or shelter to homeless individuals and families at least for the period during which the ESG funds are provided. The sub-recipient does not need to limit these services or shelter to a particular site or structure, so long as the site or structure serves the same type of persons originally served with the assistance (*e.g.*, families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or serves homeless persons in the same area where the sub-recipient originally provided the services or shelter.

**Eligible Program Participants:**

Individuals and families who are literally homeless residing in an emergency shelter. Homeless families and individuals in emergency shelters.

**HOMELESSNESS PREVENTION SERVICES (24 CFR §576.103)**

Housing relocation and stabilization services (case management): Funds must be used to create and implement a comprehensive, easily accessible service and housing response system that addresses the needs of those who are homeless or at serious risk of homelessness.

**Eligible Costs:**

- Short-term rental assistance (3 months)

- Medium-term rental assistance (4-24 months)
- Housing search and placement
- Housing stability case management;
- Rental arrearages (up to 6 months)
- Security and Utility deposits (for new units only)
- Utility deposits or arrearages
- Other related one-time or short-term expenses to assist in maintaining housing
- Leasing assistance, as necessary, to prevent the individual or family from becoming homeless when the 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.

**§576.105 Housing relocation and stabilization services.**

1. **Financial Assistance Costs.** Subject to the general conditions under §576.103 and §576.104, ESG funds may be used to pay housing owners, utility companies, and other third parties for the following costs:
  - A. **Rental application fees.** ESG funds may pay for the rental housing application fee that is charged by the owner to all applicants.
  - B. **Security deposits.** ESG funds may pay for a security deposit that is equal to no more than 2 months' rent. Under NYS state law says that a Landlord cannot ask for more than 1 months' rent.
  - C. **Last month's rent.** If necessary to obtain housing for a program participant, the last month's rent may be paid from ESG funds to the owner of that housing at the time the owner is paid the security deposit and the first month's rent. **NOTE\* Requesting last month's rent is not allowable under NYS Law.**
  - D. **Utility deposits.** ESG funds may pay for a standard utility deposit required by the utility company for all customers for the utilities listed below.
  - E. **Utility payments.** ESG funds may pay for up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service. A partial payment of a utility bill counts as one month. This assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Eligible utility services are gas, electric, water, and sewage. No program participant shall receive more than 24 months of utility assistance within any 3-year period.
  - F. **Moving costs.** ESG funds may pay for moving costs, such as truck rental or hiring a moving company. This assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
  - G. **Lease Breaking.** If a program participant receiving short- or medium-term rental assistance under §576.106 meets the conditions for an emergency transfer under 24 CFR 5.2005(e), ESG funds may be used to pay amounts owed for breaking a lease to effect an

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emergency transfer. These costs are not subject to the 24-month limit on rental assistance under §576.106.

H. **Housing search and placement.** Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing, include the following:

- A. Outreach to and negotiation with owners;
- B. Assistance with submitting rental applications and understanding leases;
- C. Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness;
- D. Assistance with obtaining utilities and making moving arrangements; and
- E. Tenant counseling.

2. **Case Management.** ESG funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a program participant who resides in permanent housing or to assist a program participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing and cannot exceed 24 months during the period the program participant is living in permanent housing. Component services and activities consist of:

- A. Using the centralized or coordinated assessment system as required under §576.400(d), to evaluate individuals and families applying for or receiving homelessness prevention or rapid re-housing assistance;
- B. Conducting the initial evaluation required under §576.401(a), including verifying and documenting eligibility, for individuals and families applying for homelessness prevention or rapid re-housing assistance;
- C. Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;
- D. Monitoring and evaluating program participant progress;
- E. Providing information and referrals to other providers;
- F. Developing an individualized housing and service plan, including planning a path to permanent housing stability; and
- G. Conducting re-evaluations required under §576.401(b).

3. **Legal services.** ESG funds may pay for legal services, as set forth in §576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

**Maximum amounts and periods of assistance.** Except for housing stability case management, the total period for which any program participant may receive these services must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family.

**Duplication of Assistance.** Financial assistance cannot be provided to a program participant who is receiving the same type of assistance through other public sources or to a program participant who has been provided with replacement housing payments under the URA, during the period of time covered by the URA payments.

**Housing counseling.** Housing counseling, as defined in §5.100, that is funded with or provided in connection with ESG funds must be carried out by organizations and counselors certified by the Secretary under 24 CFR part 214 to provide housing counseling in accordance with §5.111.

When sub-recipients provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of housing counseling, as defined in §5.100, and therefore are not required to be carried out in accordance with the certification requirements of §5.111

**Eligible Program Participants:**

Individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD.

Risk factors that make finding and maintaining housing more challenging should be used to screen people into assistance rather than screening them out.

**HOUSING PLACEMENT (RAPID REHOUSING) SERVICES (24 CFR §576.104)**

Actions taken to assist homeless persons to obtain permanent housing in properties not operated by the Monroe County; or payment of security deposits, utility deposits or first month’s rent.

**Cost Overview:**

- Rental Assistance: rental assistance and rental arrears
- Financial Assistance: rental application fees, security and utility deposits, utility payments , moving costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair; as such services found in Housing relocation and stabilization services.

**Eligible Program Participants:**

Individuals and families who meet the criteria under paragraph (1) of the “homeless” definition in 24 CFR 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.

**Eligible Costs: §576.105 Housing relocation and stabilization services**

*All the items listed under §576.105 Housing relocation and stabilization services above are also applicable to RRH services.*

**HMIS:**

All ESG sub-recipients are required to report program participant-level data, such as the number of persons served and their demographic information, in a Homeless Management Information System (HMIS) database. HMIS is an electronic data collection system that facilitates the collection of information on persons who are homeless or at risk of becoming homeless that is managed and operated locally. The CoC is the lead agency on the HMIS for Monroe County and all sub-recipients are required to supply the necessary data directly to them before the end of the program year.

Please note that domestic violence programs are exempt from the HMIS requirement, however they will be required to provide aggregate data for reporting purposes.

**ADMINISTRATION:**

Not to exceed 7.5 percent of total ESG program funds awarded.

**Eligible Costs:**

- Salaries, wages, and related costs for staff whose primary responsibilities involve program administration, developing systems for ensuring compliance with program requirements, preparing reports and other documents related to the Homeless Assistance Program, performance of financial management responsibilities related to the grant and coordinating the resolution of audit and/or monitoring findings;
- Child care, employment assistance and education assistance.
- Administrative services performed under third party contracts or agreements such as accounting services and audit services; and
- Public information activities, such as notices for pre-development permit hearings or notices to announce availability and eligibility criteria for homeless services.

**Ineligible Costs:**

Below is a non-exclusive list of ineligible costs under ESG:

- Continuum of Care Coordinating Expenses;
- Pay for foreclosure prevention;
- Pay rental assistance for rent to own/lease to purchase;
- Provide the subsidized portion of Prevention Assistance to those on Section 8;
- Provide assistance (pay security deposits and/or utility deposits etc.) to those living in subsidized housing with the exception for a new voucher holder;
- Assist a household with their rent if they have a project-based voucher;
- Assist individual(s)/households in transitional housing;
- Set aside money for individual(s) who may be at risk of losing their job;
- Assist the homeless or those at risk of becoming homeless to expunge and/or pardon their criminal records or for re-entry advocacy to help ex-offenders get jobs;
- Pay rent bills from a previous address;
- Pay utilities and/or rent for tenants renting a unit owned by a family member.
- Shelter-focused case management;

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- Mortgage payments or mortgage refinancing costs to make housing affordable;
- Rental assistance payments cannot be made on behalf of eligible individuals or families for the same period and for the same cost types that are being provided through another federal, state or local housing subsidy program;
- Pet Care;
- Construction or rehabilitation;
- Credit card bills or other consumer debt;
- Car repair for program participants;
- Food, medical or dental care and medicines;
- Clothing and grooming;
- Entertainment activities;
- Cash assistance to program participants;
- Development of discharge planning programs in mainstream institutions such as hospitals, nursing homes, jails, or prisons. However, persons who are being imminently discharged into homelessness from such public funded institutions are eligible to receive financial assistance through ESG;
- Payment of ESG programs licenses, certifications, and general classes (classes not specifically related to these funds); or
- Utility assistance for homeowners.

### **SECTION III: PROGRAM REQUIREMENTS**

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Eligibility to receive assistance under all ESG programs will be based on the guidelines outlined by HUD, initially by determining if the individual or family qualifies as "homeless" as defined in the HEARTH Act of 2009, SEC. 103, or at-risk of homelessness. Followed by determining income and the level and form of assistance necessary for the participant's unique situation.

#### **Intake**

ESG programs 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. These evaluations must be conducted in accordance with the centralized or coordinated assessment requirements set forth under § 576.400.

#### **Intake Best Practices**

DO Complete either the CoC approved Intake form or comparable Monroe County approved intake form completely. The Intake form will collect demographic data and help determine which programs the participant is eligible.

DON'T ask for extraneous information and be mindful of participants' privacy and potential past traumas (i.e. only ask information that is necessary for services/housing to be rendered).

Participants have the right to refuse to answer questions on an intake/discharge form or refuse to have their data entered into HMIS and/or comparable database.

### **Limited English Proficiency**

Executive Order 13166: Limited English Proficiency is a Federal mandate that requires Monroe County and its sub-recipients provide "meaningful access" to applicants and beneficiaries of their programs who do not speak English as their primary language and who have a limited ability to read, write, speak or understand English. Within Monroe County this is provided by LanguageLine but Sub-recipients are free to choose their own method of complying with this requirement.

### **HOMELESSNESS PREVENTION (HP) & RAPID REHOUSING (RRH)**

Any ESG programs receiving RRH/HP funds shall be subject to all of the requirements that apply to the grantee under the HUD ESG Regulations.

#### ***Literally Homeless Requirement for RRH***

To receive ESG rapid re-housing (ESG-RRH) assistance, an individual or family must demonstrate at initial evaluation that it is literally homeless (referred to as Category 1 in the Homeless Definition Final Rule). An individual or family is defined as "literally homeless" if;

1. Living in a public or private place not meant for human habitation,
2. Living in temporary shelter, which includes congregate shelters and transitional housing, or
3. Exiting an institution where the individual or family has resided for 90 or fewer days and was living in shelter or in a place not meant for habitation before entering the institution.

#### **Calculating Income**

An ESG eligible household must have a gross annual income that is at or below 30% of the AMI. AMI is determined by HUD and updated on a yearly basis.

#### **Homelessness Prevention Income Requirements**

The ESG Program interim rule limits eligibility for homelessness prevention assistance to individuals and families with incomes below 30 percent of AMI at intake and incomes that do not exceed 30 percent of AMI at reassessment, which must take place not less than once every 3 months. Income must be calculated at the time of application and every three (3) months thereafter as part of the re-certification process for individuals or families receiving Homelessness Prevention. Income calculations must be documented in the client file.

#### **Rapid Re-Housing Income Requirements**

Program participants receiving ESG-RRH assistance do not require an income assessment at initial evaluation. At re-evaluation, which must take place not less than once annually, the participant's household must have an annual income that does not exceed 30 percent of median family income for the area, as determined by HUD.

**RRH/HP Requirements for All Program Applicants:**

- Assess every program applicant for risk of entering shelter (HP) or verification of their current stay in shelter/on the street (RRH)
- Use a clear documented process to determine the type, level, and duration of assistance for each program participant, in compliance with the written standards.
- Re-evaluate eligibility at least once every 3 months for all program participants receiving rental assistance for Homelessness Prevention assistance and every 12 months for Rapid Rehousing assistance.
- Provide case management or support services, as needed, to all program participants receiving assistance in order to transition them to independence.
- Adhere to all data collection and reporting requirements.

**Participation in Support Services**

Support services cannot be mandated for individual(s) receiving ESG assistance. Households who are income eligible but fail to make an effort to find employment, secure income, apply for other rental assistance programs etc., although they demonstrated the ability to sustain housing at the time of entry cannot have their assistance terminated based on these criteria.

Participants enter as eligible for three (3) months; they cannot be promised any certain length of assistance.

**Case Management**

Sub-recipients are expected to provide case management services to all ESG program participants including connecting program participants to resources including:

- Referrals to appropriate supportive services including obtaining permanent housing, health treatment, mental health treatment, vocational and educational training, and other services essential for achieving independent living; AND
- Other Federal, State, local and private assistance available to support program participants in obtaining housing stability including:
  - Medicaid
  - Supplemental Nutrition Assistance Program
  - Women, Infants and Children (WIC)
  - Federal/State Unemployment Insurance
  - Social Security Disability Insurance,
  - Supplemental Security Income
  - Child and Adult Care Food Programs
  - Senior Benefits Program
- Other resources that assist program participants in obtaining income and other benefits.



## SECTION IV: OTHER REQUIREMENTS

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### **Area-Wide Systems of Coordination Requirements 24 CFR §576.400(a)**

Programs requesting ESG funding must demonstrate such collaboration and document that proposed activities will assist the CoC in meeting identified outcomes at the time of submitting their RFP to Monroe County. All ESG programs must coordinate and integrate, to the maximum extent practicable, ESG-funded activities with other programs targeted to homeless people in the area covered by the CoC or area over which the services are coordinated to provide a strategic, community-wide system to prevent and end homelessness in that area. ESG programs must document how these and other programs will be used in collaboration with proposed ESG-funded activities. Continuum of Care and ESG programs need to work together and need to establish and meet performance standards (24 CFR §576.400 (a-c) such as:

- Reducing the average length of time, a person is homeless;
- Reducing return to homelessness;
- Increasing access to permanent housing;
- Reducing the number of homeless individuals and families;
- Improving employment rate and income amounts of program participants;
- Reducing first time homelessness;
- Preventing homelessness and achieving independent living in permanent housing for families and youth defined as homeless under other Federal programs; and
- Connect individuals to mainstream resources such as public assistance, vocational and medical care resources 24 CFR §576.401(d).

### **Coordinated Entry Systems (24 CFR §576.400 (d))**

The CoC has developed a centralized entry system in accordance with the requirements established by HUD, each ESG-funded program or project within the CoC's jurisdiction must participate in that assessment system.

Acceptance of an ESG award means the ESG programs agrees to participate in the coordinated entry system implemented by the CoC. All ESG programs must work with the CoC to ensure that screening, assessment, and referral of program participants are consistent. A victim service ESG programs may choose not to use the CoC's centralized or coordinated assessment system, but the information must still be provided using anonymous data via another secure process.

### **Participation in HMIS 24 CFR §576.400 (f)**

Sub-recipient must ensure that data on all persons served and all activities assisted under ESG are entered into the community-wide HMIS overseen by the CoC. If the ESG programs is a victim service provider or a legal services provider, it may use a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

#### **Homeless Participation 24 CFR §576.405**

ESG programs must provide avenues for homeless participation in programs supported by ESG funds. We requires that ESG programs involve homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under ESG, in providing services assisted under ESG, and in providing services for occupants of facilities assisted under ESG. This involvement may include employment or volunteer services. Sub-recipients must also provide a written statement attesting to their involvement at the time of submitting their RFP and Monroe County reserves the right monitor each sub-recipient to ensure compliance.

Monroe County consults with homeless or formerly homeless individuals in considering and making policies and decisions regarding assistance that receive funding under Emergency Solutions Grant (ESG). Provisions are also made when feasible for the participation of not less than one homeless individual or formerly homeless individual at any given time on the CoC board of directors or other equivalent policy-making entity. Information on this is included in our Annual Action Plan per the requirements of 24 CFR 91.220

#### **Discrimination Based On Religious Belief**

All organizations that receive Federal financial assistance are prohibited from discriminating against beneficiaries in the provision of program services based on religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice, while also noting that organizations that participate in programs funded by indirect financial assistance need not modify their program activities to accommodate beneficiaries who choose to expend the indirect aid on those organizations' programs.

Monroe County requires that any faith-based organizations that receives direct Federal financial assistance under a domestic social service program is required to give notice to beneficiaries that:

- (1) The organization may not discriminate against a beneficiary based on religion, a religious belief, a refusal to hold a religious belief, or a refusal to attend or participate in a religious practice;
- (2) The organization may not require a beneficiary to attend or participate in any explicitly religious activities that are offered by the organization, and any participation by the beneficiaries in those activities must be purely voluntary;

#### **Recordkeeping and Reporting Requirements 24 CFR §576.500**

ESG programs are responsible for verifying and documenting the eligibility of all ESG participants prior to providing ESG shelter and/or assistance. They are also responsible for maintaining this documentation in the participant case file. ESG programs with insufficient case file documentation may be found out of compliance with ESG program regulations during a County or HUD monitoring. All files should be maintained in a secure location by the sub-recipient for a minimum of 5 years. Monroe County keeps all program records for 10 years.

#### **Drug Free Workplace Requirements 2 CFR § 2429**

All sub-recipients must make all available efforts to provide a drug-free workplace as required by 2 CFR § 2429 and must adhere to the following statement:

You as the funding recipient must comply with drug-free workplace requirements in Subpart B (or Subpart C, if the recipient is an individual) of part 2429, which adopts the government wide implementation (2 CFR part 182) of sections 5152-5158 of the Drug-Free Workplace Act of 1988 (Pub. L. 100-690, Title V, Subtitle D; 41 U.S.C. 701-707).

A funding recipient other than an individual who is required under 2 CFR 182.225(a) to notify Federal agencies about an employee's conviction for a criminal drug offense must notify each HUD office with which it currently has an award.

#### **SECTION V: GENERAL PROGRAM DOCUMENTATION FOR RRH/HP**

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- Completed Assessment (including data on secondary adults and children)
- Signed HMIS Release(s) (For all adult members of the household)
- Income Verification
- Backup Documentation (Paystubs, third Party Verifications, etc.)
- Housing Status Verification
- Backup Documentation (Doubled-Up Home Visit Form, Signed Note from Shelter, etc.)
- Lack of Resources Documentation
- Current Budget
- Case Notes
- Documents to illustrate lack of resources i.e. Bank Statements/Credit Report
- Staff Certification of Eligibility
- Case Notes and Housing Stabilization Plan
- Re-Evaluation of Eligibility (Completed every 3-months for RRH and 12-months for HP)
- All OTHER documents and information collected during RRH/HP services
- Financial Assistance Forms
- Lead Compliance Documentation
- Current Unit Inspection Report (Habitability)
- Signed Lease Containing Participant's Name(s)
- Rent Reasonableness Documentation
- Utility Bills (if paid with RR/HP funds)
- Copies of financial assistance payments (checks, POs, etc.)

#### **Income Documentation required to be included in RRH and HP files 24 CFR §576.500 (e)**

For each program participant who receives homelessness prevention assistance, or who receives rapid re-housing assistance longer than one year, the following documentation of annual income must be maintained:

- Income evaluation form containing the minimum requirements specified by HUD and completed by ESG Program Staff; and
- Source documents for the assets held by the program participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement)

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### **Acceptable Alternatives to Income Source Documentation**

- A written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by intake staff of the oral verification by the relevant third party of the income the program participant received over the most recent period for which representative data is available; or
- To the extent that source documents and third party verification are unobtainable, the written certification by the program participant of the amount of income the program participant received for the most recent period representative of the income that the program participant is reasonably expected to receive over the 3-month period following the evaluation.

If the program participant meets the criteria under paragraph (2) or (3) of the “at risk of homelessness” definition in §576.2, certification of the child or youth's homeless status by the agency or organization responsible for administering assistance under the Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.), the Head Start Act (42 U.S.C. 9831 et seq.), subtitle N of the Violence Against Women Act of 1994 (42 U.S.C. 14043e et seq.), section 330 of the Public Health Service Act (42 U.S.C. 254b), the Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.), section 17 of the Child Nutrition Act of 1966 (42 U.S.C. 1786) or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11431 et seq.), as applicable.

### **Program Participant Records 24 CFR §576.500 (f)**

In addition to evidence of homeless status or “at risk of homelessness” status, as applicable, records must be kept for each program participant that document:

- The services and assistance provided to that program participant, including, as applicable, the security deposit, rental assistance, and utility payments made on behalf of the program participant;
- Compliance with the applicable requirements for providing services and assistance to that program participant under the program components and eligible activities:
  - Fair Market Rent 24 CFR §576.106(d)
  - Rent Reasonableness 24 CFR §576.106(d)
  - Housing Standards 24 CFR 576.403(c)
  - Lead-based paint requirements 24 CFR §576.403(a)
  - Lease between the program participant and landlord 24 CFR §576.106(g)
  - Rental assistance agreement between the landlord and sub-recipient or ESG programs 24 CFR §576.106(e)
  - Maximum Amounts and Periods of Assistance (24- month cap in 3-year period) 24 CFR §576.105(c) & §576.106(a)
  - Participation in HMIS 24 CFR §576.400(f)
  - Prohibition of use with other subsidies 24 CFR §576.105 & §576.106

### **Participant Records Additional Requirements**

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Each program must also keep demographic Records - documentation illustrating data elements required by HUD (participants may refuse to answer questions). These records may be stored in HMIS or equivalent database.

Monroe County does not require the participant record at time of vouchering only the backup documentation relevant to the voucher but the full record must be made available upon request or during program monitoring.

#### **Centralized or Coordinated Assessment 24 CFR §576.500 (g)**

ESG programs must keep documentation evidencing the use of, and written intake procedures for, the centralized or coordinated assessment system(s) developed by the Continuum of Care(s) in accordance with the requirements established by HUD.

#### **Rental Assistance Agreements and Payments 24 CFR §576.500 (h)**

The records must include copies of all leases and rental assistance agreements for the provision of rental assistance, documentation of payments made to owners for the provision of rental assistance, and supporting documentation for these payments, including dates of occupancy by program participants.

#### **Utility Allowance 24 CFR §576.500 (i)**

The records must document the monthly allowance for utilities (excluding telephone) used to determine compliance with the rent restriction.

#### **Shelter and Housing Standards 24 CFR §576.500 (j)**

The records must include documentation of compliance with the shelter and housing standards in § 576.403, including inspection reports:

- Lead-based paint remediation and disclosure. Required for all ESG funded shelter facilities and all housing occupied by program participants.
- Minimum standards for permanent housing.

### **SECTION VI: HOUSING INSPECTION REQUIREMENTS**

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An ESG funded program cannot use its funds to help a program participant remain in or move into housing that does not meet the minimum habitability standards under §576.403(c). This restriction applies to all activities under the Homeless Prevention and Rapid Rehousing components, including rental assistance and housing relocation and stabilization services. In addition:

- If an eligible household needs homeless prevention assistance to remain in its existing unit, the assistance can only be provided if that unit meets the minimum standards.
- If an eligible household needs homelessness prevention or rapid rehousing assistance to move to a new unit, the assistance can only be provided if the new unit meets the minimum standards.
- The unit the household is leaving does not need to be inspected.
- Minimum standards are required even if one-time assistance is provided (e.g. rental arrears, security deposit, etc.)

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- The housing must also comply with any other standards established by Monroe County that exceed or add to these minimum standards.
- The same standards apply regardless of the amount of rental assistance and/or housing relocation and stabilizations services funds involved.
- The ESG programs must be sure to document compliance with the ESG habitability standards in the program participant's file.

### **Lead-based Requirements**

The lead-based paint requirements exist to protect vulnerable families from potential health hazards. To prevent lead-poisoning in young children, ESG programs must comply with the Lead-Based Paint Poisoning Prevention Act of 1973 and its applicable regulations found at 24 CFR 35. Under ESG, the rule is that a lead-based paint visual assessment must be completed for all units that meet the three following conditions:

- The household living in the unit is being assisted with ESG financial assistance (rent assistance, utilities assistance, utility/security deposits, or arrears),
- The unit was constructed prior to 1978, AND
- A child under the age of six is or will be living in the unit.

Under ESG, the lead requirements apply regardless of whether a household is remaining in an existing unit or moving to a new unit. The visual assessment must be completed prior to ESG assistance being provided, and annually thereafter.

ESG programs are responsible for ensuring that property owners and managers meet the lead-based paint requirements. Sub-recipients should think about these requirements in two categories:

### **Disclosure Requirements**

Disclosure requirements are triggered for ALL properties constructed prior to 1978. These requirements require that lessors (property owners or managers) provide tenants with:

- A disclosure form for rental properties disclosing the presence of known and unknown lead-based paint; AND
- A copy of the "Protect Your Family from Lead in the Home" pamphlet. Both the disclosure form and pamphlet are available at: <https://www.epa.gov/lead/protectyour-family-lead-your-home>

### **The Visual Assessment**

Visual assessments for ESG funded units are only triggered under certain circumstances:

- The leased property was constructed before 1978;
- AND
- A child under the age of six will be living in the unit occupied by the household receiving ESG assistance.

Depending on the results of the visual assessment, additional steps may be required before assistance can be provided for that unit, as the unit needs to be brought into compliance. There are certain exceptions to the rule.

Visual assessments are not triggered under the following circumstances:

- It is a zero-bedroom or single room occupancy (SRO-sized) unit;

- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint;
- The property has had all lead-based paint identified and removed in accordance with HUD regulations;
- The participant is receiving Federal assistance from another program, where the unit has already undergone a visual assessment within the past 12 months – e.g., if the participant has a Section 8 voucher and is receiving ESG assistance for a security deposit or arrears (note, in such cases, ESG staff are required to obtain documentation that a visual assessment has been conducted for the case file); or
- It meets any of the other exemptions described in 24 CFR Part 35.115(a).

If any of the conditions outlined above are met, staff simply needs to document the condition and place a copy in the case file.

## **SECTION VII: RENTAL ASSISTANCE**

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### **Fair Market Rent and Rent Reasonableness**

To provide rental assistance with ESG funds, the Gross Rent cannot exceed either HUD’s published FMR or the rent reasonableness standards (the average of three (3) comparable rents).

#### **Calculating Gross Rent**

If tenants are responsible for paying their own utilities, the monthly utility allowance must be added to the contract rent amount to calculate gross rent, to determine whether the unit meets the FMR and rent reasonableness standards. Utility costs may include gas, electric, water, sewer, and trash.

Telephone, cable or satellite television service and internet service are not included in FMRs and are not allowable costs under ESG.

- If the gross rent for the unit is below both the FMR and the rent reasonableness standard, then ESG funds may be used to pay rent for the unit.
- If the gross rent for the unit exceeds either FMR or rent reasonableness standard, ESG funds cannot be used to pay any portion of the rent.
- If the reasonable rent for a specific unit in a community is lower than the FMR, then the rent for the unit assisted with ESG funds must not exceed the lesser of the FMR or the rent reasonableness standard.
- If the gross rent for the unit exceeds either the rent reasonableness standard or FMR, ESG recipients are prohibited from using ESG funds for any portion of the rent, even if the household is willing and/or able to pay the difference.

#### **Deposits and Non-Refundable Fees**

The security deposit cannot exceed one (1) month’s rent (limited to one per household per grant term) and utility deposits are an eligible activity if needed. Deposits will remain with the household. Nonrefundable fees such as cleaning fees and late fees cannot be paid from ESG funds.

#### **Rent Reasonableness**

Rent for units assisted under the ESG Program (with rental assistance) must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units. Documentation should include where possible: market surveys, classified ads, or information from real estate agents, along with a signed lease. When comparing rent reasonableness, the proposed unit must be compared to three (3) other units.

#### **Rental Assistance Agreements 24 CFR 576.106(g)**

When rental assistance is supported with ESG funds, a program participant and the landlord must have some form of enforceable lease. In addition, a rental assistance agreement is required between the ESG program and the landlord. The ESG programs must make timely payments to each owner in accordance with the rental assistance agreement.

The ESG programs may make rental assistance payments only to an owner with whom the ESG programs has entered into a rental assistance agreement. The rental assistance agreement must set forth the terms under which rental assistance will be provided in accordance with these policies and procedures. The rental assistance agreement must provide that, during the term of the agreement, the landlord must give the ESG programs a copy of any notice to the program participant to vacate the housing unit, or any complaint used under state or local law to commence an eviction action against the program participant. The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.

The rental assistance agreement with the landlord must terminate and no further rental assistance payments be made if:

- The program participant moves out of the housing unit for which the program participant has a lease;
- The lease terminates and is not renewed; or
- The program participant becomes ineligible to receive ESG rental assistance.

#### **Lease Requirements**

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit. The lease must be between the owner and the program participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease if the agreement gives the program participant an enforceable leasehold interest under the law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

### **SECTION VIII: OCCUPANCY STANDARDS**

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Monroe County's occupancy standards comply and enhance the current Housing Inspection Standards and available UPCS requirements and outline how the number of bedrooms required by the household will be determined. The following basic standards can be modified to take into consideration specific household composition and circumstances (i.e., pending child custody cases, chronic illnesses, family member who is absent most of the time).

- No more than two persons are required to occupy a bedroom;

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- Persons of different generations (i.e., grandparents, parents, and children), persons of the opposite sex (other than spouses/couples) and unrelated adults are not required to share a bedroom;
- Children of the same sex (regardless of age) and couples co-habiting (whether legally married) must share the same bedroom for purpose of assigning the number of bedrooms;
- A live-in care attendant who is not a member of the family is not required to share a bedroom with another household member;
- Individual medical problems (i.e., chronic illness) sometimes require either separate bedrooms for household members who would otherwise be required to share a bedroom or an extra bedroom to store medical equipment;
- In most instances, a bedroom is not provided for a family member who will be absent most of the time, such as a member who is away in the military.

Occupancy standards are used to provide consistent criteria for determining the unit size for which the household is eligible and thus, the amount of assistance to be provided. Fair housing rules permit a household to select smaller units that do not create seriously overcrowded conditions. A tenant may select a larger unit if it meets the FMR for the actual number of bedrooms for which they are eligible according to the eligibility guidelines. Tenants are not allowed to give the landlord additional funds for larger units.

**Undersized Units:** If a family elects to occupy a unit with fewer bedrooms than specified in the Occupancy Guidelines, the FMR is based on the actual number of bedrooms;

**Oversized Units:** If a family elects to occupy a unit with more bedrooms than specified in the Occupancy Guidelines, the FMR is based on the number of bedrooms specified in the Occupancy Guidelines.

If an additional bedroom is required for an individual who would normally be required to share a room, the reason must be documented in the file. For example: If an additional room is needed because of a medical condition, documentation may be a note from their doctor; otherwise, if the case manager determines an additional room is needed (medical condition, care-giver, medical equipment etc.) the case manager must document the reason in the case management notes.

In cases where college students and children staying only for weekends etc., the amount of time spent in the unit should be taken into consideration before assigning additional bedroom(s). ESG assistance is short-term and a smaller unit is acceptable if it does not create serious overcrowding; a living room can be counted as a sleeping room. If student/children will be in the unit most of the time and future rent will not be a burden, then an additional bedroom can be assigned.

A separate bedroom cannot be issued for an unborn child. Once the baby is born a second bedroom can be issued unless the baby has an older, same sex sibling who has already been issued a bedroom.

### **SINGLE ROOM OCCUPANCY**

Single room occupancy (SRO) unit provides living and sleeping space for the exclusive use of the occupant but requires the occupant to share sanitary and/or food preparation facilities with others.

- No more than one person may occupy an SRO unit.
- ESG assistance may be provided using SRO Fair Market Rent + utilities.
- Agencies can provide ESG assistance provided the rent is not already subsidized.

- When providing ESG assistance in an SRO unit, there must be a lease in place.
- Because no children live in SRO housing, the Housing Standards applicable to lead based paint do not apply.

### **Habitability Standards**

**Access:** Access doors to the SRO unit must have working locks for privacy. The occupant must be able to access the unit without going through any other unit. Each unit must have immediate access to two or more approved means of exit from the building, appropriately marked and leading to safe and open space at ground level. The SRO unit must also have other means of exit required by State or local law.

**Fire Safety:** All SRO facilities must have a sprinkler system that protects major spaces. Major spaces are defined as hallways, common areas, and any other areas specified in local fire, building or safety codes. SROs must also have hard-wired smoke detectors, and any other fire and safety requirement required by state or local law.

Sanitary facilities and space and security standards must meet local code requirements for SRO housing. In the absence of local code standards, the requirements discussed below apply [24 CFR §982.605]:

**Sanitary Facilities:** At least one flush toilet that can be used in privacy, a lavatory basin and a bathtub or shower in proper operating condition must be provided for each six persons (or fewer) residing in the SRO facility. If the SRO units are leased only to men, flush urinals may be substituted for up to one half of the required number of toilets. Sanitary facilities must be reasonably accessible from a common hall or passageway and may not be located more than one floor above or below the SRO unit. They may not be located below grade unless the SRO units are located on that level.

**Space and Security:** An SRO unit must contain at least 110 square feet of floor space, and at least 4 square feet of closet space with an unobstructed height of at least five feet for use by the occupant. If the closet space is less than four square feet, the habitable floor space in the SRO unit must be increased by the amount of the deficiency. Exterior doors and windows accessible from outside the SRO must be lockable. All other ESG eligibility requirements apply.

### **EFFICIENCY OR STUDIO UNITS**

**Definition:** A small apartment unit which combines living room, bedroom, and kitchenette into a single room. Efficiency apartments are sometimes smaller than studio apartments.

ESG assistance may be provided based on 0-bedroom size at Fair Market Rent + utilities.

All other ESG eligibility requirements apply.

### **MOBILE HOME OR TRAILERS**

**Definition:** A structure that is transportable in one piece and can be moved from one place to another.

The term 'mobile home' or 'trailer' is often used interchangeably.

ESG funds may assist with these recognized housing units if they are securely attached to a stationary pad, i.e. tied down. The pad may be either a poured basement, concrete slab on grade or, must be securely anchored to the site and meet all state and local code requirements.

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- ESG will not pay for any unit that can be attached to a vehicle and readily moved from location-to-location.
- ESG will not pay for units that are intended for recreational purposes such as campers or tents.
- Housing Case Managers shall use discretion when committing ESG funds for the use of these units and documentation must be in the file.
- To provide ESG assistance, a lease must be in place.
- ESG assistance may be made for the unit size FMR amount and may include the lot rent if it is written in the lease as such
- FMR amount + lot rent amount should NOT be added together to obtain FMR. It is one **or** the other, not both. (Utilities would also need to be considered as part of the FMR).
- Persons receiving ESG assistance may not pay the 'difference' to 'qualify' under FMR amounts.
- ESG may assist those who own units but cannot afford to pay lot rent.
- All other ESG eligibility requirements apply.
- Rent Reasonableness is based on comparable units taking into consideration location and size of unit.
- Units may be in a community setting or on private property.
- Additional Habitability Standards do apply:

**Security** - A mobile home or trailer must be placed on the site in a stable manner and must be free from hazards such as sliding or wind damage. The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding. The unit must have access to basic amenities like water and electricity.

**Manufactured Housing** - A manufactured home is a manufactured structure transportable in one or more parts that is built on a permanent chassis and designed for use as a principal place of residence.

#### **MINIMUM STANDARDS FOR PERMANENT HOUSING (PREVENTION AND RAPID REHOUSING) 24 CFR §576.404(C)**

As previously mentioned, ESG programs cannot use ESG funds to help a program participant remain or move into housing that does not meet the minimum habitability standards.

- 1. Structure and materials.** The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- 2. Space and security.** Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.
- 3. Interior air quality.** Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- 4. Water supply.** The water supply must be free from contamination.
- 5. Sanitary facilities.** Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- 6. Thermal environment.** The housing must have any necessary heating/cooling facilities in proper operating condition.
- 7. Illumination and electricity.** The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.

**8. Food preparation.** All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

**9. Sanitary conditions.** The housing must be maintained in a sanitary condition.

**10. Fire safety.**

- There must be a second means of exiting the building in the event of fire or other emergency.
- Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person.
- The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, community rooms, day care centers, hallways, stairwells, and other common areas.
- The unit must be in compliance with any local codes and regulations. When the regulations are in conflict, the higher safety standard must be met.

## **SECTION IX: GRANT ADMINISTRATION**

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### **Client Confidentiality 24 CFR §576.500(x)**

Confidentiality of all records is required. All records containing personally identifying information of any applicant for and/or recipient of ESG assistance will be kept secure and confidential.

Monroe County requires that ESG programs ensure:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG assistance will be kept secure and confidential;
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter; and
- The address or location of any housing of a program participant will not be made public, except as provided under a preexisting privacy policy of Monroe County or the ESG program and consistent with state and local laws regarding privacy and obligations of confidentiality.
- Information regarding participants will be released only after appropriate authorization to release and/or obtain information is completed.
- Access to client records should always be restricted to the employee or agent that must have access to the client's information in order to properly perform their normal job functions.

Sub-recipients should inform clients about their rights to confidentiality and disclose that all information contained in their file is confidential. Employees or program funders with access to information about the client are bound by confidentiality guidelines and will not disclose this information without prior written consent.

Upon written request, ESG clients should have access to review their records and case file content. A private location should be provided to the client for this purpose within the ESG program. Clients should

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not be allowed to remove their case file from the ESG program; however, they may be granted copies of file contents upon request.

#### **Insurance Coverage**

All recipients of ESG funds must carry up to date insurances including General and Commercial Liability Insurance. We maintain documentation of insurance coverage, with their Agency records.

#### **Matching Funds**

Monroe County maintains records supplied by sub-recipients of the source and use of contributions made to satisfy the matching requirement in § 576.201. The records indicate the particular fiscal year grant for which each matching contribution is counted.

#### **Conflicts of Interest § 200.112**

Funded ESG programs must attest that they have no conflicts of interest within their organization at the time of application and must keep records to show compliance with the organizational conflicts-of-interest requirements in § 576.404:

*No ESG assistance may not be conditioned on acceptance or occupancy of emergency shelter or housing owned by any at Monroe County or it's the sub-recipient, or a parent or subsidiary of the sub-recipient. Any organization found not to be in compliance with this risk losing all or part of their funding in conjunction with the noncompliance section of this policies and procedures.*

For the procurement of goods and services, for all other transactions and activities, the following restrictions apply:

*No person who holds any kind of position of authority when it comes to funding decisions can directly benefit from activities assisted under the program in any direct or indirect way, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure. This section apply to any person who is an employee, agent, consultant, officer, or elected or appointed official of Monroe County or its sub-recipients. Any individual found not to be in compliance with this risk losing all or part of their organizations funding in conjunction with the noncompliance section of this policies and procedures and facing legal action if applicable.*

Upon the written request of the Monroe County, HUD may grant an exception to the provisions of this subsection on a case-by-case basis, provided that at minimum the following requirements are met:

- The sub-recipient can provide an opinion of an attorney that the interest for which the exception is sought would not violate state or local law;  
AND
- HUD must be able to conclude that the exception will serve to further the purposes of the ESG program and the effective and efficient administration of the sub-recipient's program or project, taking into account the cumulative effect of the following factors, as applicable:
  - (A) Whether the exception would provide a significant cost benefit or an essential degree of expertise to the program or project that would otherwise not be available;
  - (B) Whether an opportunity was provided for open competitive bidding or negotiation;

- (C) Whether the affected person has withdrawn from his or her functions, responsibilities or the decision-making process with respect to the specific activity in question;
- (D) Whether the interest or benefit was present before the affected person was in the position described in paragraph (b)(1) of this section;
- (E) Whether undue hardship results to Monroe County, the sub-recipient, or the person affected, when weighed against the public interest served by avoiding the prohibited conflict; and
- (F) Any other relevant considerations.

All contractors of the sub-recipient must comply with the same requirements that apply to sub-recipients under this section.

#### **Homeless Participation**

Sub-recipients must document their compliance with the HUD and Monroe County's homeless participation requirements.

#### **Faith-based Activities**

ESG programs should document their compliance with the faith-based activities requirements under § 576.406.

#### **Financial Records**

Monroe County retains supporting documentation for all costs charged to the ESG grant we make this information available for public review through the Federal Audit Clearinghouse website at <https://facweb.census.gov/uploadpdf.aspx>. ESG programs must keep documentation showing that ESG grant funds were spent on allowable costs in accordance with the requirements for eligible activities under § 576.101 through 576.109, financial management in 2 CFR 200.302, and the cost principles in 2 CFR part 200, subpart E.

#### **ESG Programs and Contractors**

Monroe County retains copies of all solicitations and agreements with ESG programs, records of all payment requests by and dates of payments made to ESG programs, and documentation of all monitoring and sanctions of ESG programs, as applicable.

In turn, ESG programs must retain copies of all procurement contracts and documentation of compliance with the procurement requirements in 2 CFR § 200 (D). Monroe County ensures that all ESG programs comply with the recordkeeping requirements specified by HUD regulations.

#### **Period of Record Retention**

All records pertaining to each fiscal year of ESG funds are retained by Monroe County for 10 years. ESG client files, financial records to support billings must be retained by the sub-recipient for five (5) years after the grant has been closed in accordance with 24 CFR §576.500(y).

. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

#### **Other Federal Requirements**

ESG programs must document their compliance with the Federal requirements in § 576.407 and § 576.409, as applicable, including:

- Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under § 576.407(a).
- Data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds.
- Documentation required under 24 CFR 5.168 in regard to the sub-recipient's Assessment of Fair Housing and the certification that the sub-recipient will affirmatively further fair housing.
- Records demonstrating compliance with the uniform administrative requirements in 2 CFR part 200.
- Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.
- Certifications and disclosure forms required under the lobbying and disclosure requirements in 24 CFR part 87.
- Data on emergency transfers requested under §576.409, pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.
- Relocation. The records must include documentation of compliance with the displacement, relocation, and acquisition requirements in § 576.408.

**SECTION X: ADMINISTRATION OF PROGRAMS AND DISTRIBUTION OF FUNDS**

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Up to 7.5 percent of Monroe County’s ESG allocation can be used for Administrative activities. These include general management, oversight, and coordination; reporting on the program; the costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings; the costs of preparing and amending the ESG and homelessness-related sections of the Consolidated Plan, Annual Action Plan, and CAPER; and the costs of carrying out environmental review responsibilities.

Monroe County, in order to maximize resources collaborates with the city of Rochester with coordination with the CoC, to release a joint RFP for the annual solicitation of applications for eligible projects. The RFP is based on priority needs in the community, which is determined with input from Rochester/Monroe County CoC, Monroe County Department of Human Services, Homeless Services Network (HSN), and area service providers.

Application review and funding is conducting by CD staff, city of Rochester Neighborhood and Business Development staff, CoC, staff from the Monroe County Department of Human Services, Emergency Services Division and a formerly homeless participant.

**Timeline**

February/March	Joint RFP is Released with the City of Rochester
April	Application Window Closed/ Application Review
June	Legislature Approval/Added to the Annual Action Plan for HUD
August	New Program Year Begins
July	Program Year Ends

## **NOTICES OF FUNDING OPPORTUNITIES**

In order to comply with federal regulations including the ones at § 200.204, Monroe County provides publication of funding opportunities for ESG in a public notice with the following information:

(a) Summary information:

- (1) Federal Awarding Agency Name;
- (2) Funding Opportunity Title;
- (3) Announcement Type (whether the funding opportunity is the initial announcement of this funding opportunity or a modification of a previously announced opportunity);
- (4) Funding Opportunity Number (required, if applicable). If the Federal awarding agency has assigned or will assign a number to the funding opportunity announcement, this number must be provided;
- (5) Assistance Listings Number(s);
- (6) Key Dates. Key dates include due dates for applications or Executive Order 12372 submissions, as well as for any letters of intent or pre-applications. For any announcement issued before a program's application materials are available, key dates also include the date on which those materials will be released; and any other additional information, as deemed applicable by the relevant Federal awarding agency.

(b) Availability period:

All funding opportunities are available for application between 30 and 60 calendar days unless exigent circumstances require as determined by the Monroe County or partner agency head or delegate.

(c) Full text of funding opportunities:

- (1) Full programmatic description of the funding opportunity.
- (2) Federal award information, including sufficient information to help an applicant make an informed decision about whether to submit an application.
- (3) Specific eligibility information, including any factors or priorities that affect an applicant's or its application's eligibility for selection.
- (4) Application Preparation and Submission Information, including the applicable submission dates and time.
- (5) Application Review Information including the criteria and process to be used to evaluate applications..
- (6) Federal Award Administration Information.
- (7) Applicable terms and conditions for resulting awards, including any exceptions from these standard terms.

## **PROPOSAL REVIEW**

Monroe County has a collaborative review process in place for evaluating and scoring proposals using weighted scores to comply with 2 CFR 200.205 which says: For discretionary Federal awards, unless prohibited by Federal statute, the Federal awarding agency must design and execute a merit review process for applications, with the objective of selecting sub-recipients most likely to be successful in delivering results based on the program objectives outlined in section § 200.202.

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We have participation from the CoC, DHS, the City of Rochester, and at least one homeless or formally homeless individual in our scoring process. We use the following categories which we include in our RFP to ensure we are selecting the best sub-recipients to complete the objectives and continue in our mission to end homelessness:

<b>2018-19 ESG Program Proposal Evaluation Criteria Elements</b>	<b>Maximum Point Value</b>
1. Responsiveness to the ESG service categories selected by the City, including successfully addressing priority categories.	15
2. Anticipated impact of proposed ESG program on advancing or expanding services on reducing the incidence of homelessness.	10
3. Soundness and efficacy of the proposed ESG Program Scope of Services succinctly described.	15
4. Demonstrated engagement in strategic and sound collaboration with community partner(s).	10
5. Feasibility of proposed ESG Program service delivery implementation plan.	25
6. Consultant's demonstrated capacity for program implementation and management, including human resource functions and projections, as based on relevant experience and reference checks of the consultant, demonstrated mastery of required technology and information system management.	15
7. Consultant's previous service management record of reaching service delivery goals and spending budgeted funds within the program year.	10
Total	100

**MONITORING AND REPORTS § 200.329**

Monroe County is responsible for oversight of the operations of the ESG supported activities. We monitor to assure compliance with the applicable Federal requirements and that performance expectations are being achieved but more importantly we do it to educate so that the ESG programs run smoothly and operate efficiently. Monitoring covers each ESG program, function or activity.

**Reporting program performance.** Monroe County require that sub-recipients report outcomes and performance goals to us on a quarterly basis and provide all the necessary information to the CoC to create the annual SAGE report.

Sub-recipient reports submitted to Monroe County are due no later than 60 calendar days after the period of performance end date. If applicable a sub-recipient must submit to the pass-through entity, no later than 30 calendar days after the period of performance end date, all final performance reports as required by the terms and conditions of the Federal award.

In accordance with above mentioned performance reporting, these reports contain at least the following:

- (i) A comparison of actual accomplishments to the objectives of the Federal award established for the period.
- (ii) The reasons why established goals were not met, if appropriate.
- (iii) Additional pertinent information including, when appropriate, analysis and explanation of cost overruns or high unit costs.

**Significant developments.** Events may occur between the scheduled performance reporting dates that have significant impact upon the supported activity. In such cases, the sub-recipient must inform the Monroe County as soon as the following types of conditions become known:

- (1) Problems, delays, or adverse conditions which will materially impair the ability to meet the objective of the Federal award. This disclosure must include a statement of the action taken, or contemplated, and any assistance needed to resolve the situation.
- (2) Favorable developments which enable meeting time schedules and objectives sooner or at less cost than anticipated or producing more or different beneficial results than originally planned.

**Site visits.** Monroe County try to do onsite monitoring at least once a program year, this can be more if required or if a program is found to be out of compliance during the desk review.

**Performance report requirement waiver.** Monroe County may waive any performance report required if it is deemed to not applicable.

#### **PROPOSAL REJECTION AND RESPONDING TO NON-COMPLIANCE § 200.213**

Monroe County is not required to report a determination that an applicant is not qualified for a Federal award per the award terms and conditions, as described in § 200.208.

If Monroe County does not make a Federal award to an applicant because the official determines that the applicant does not meet either or both of the minimum qualification standards as described in § 200.206(a)(2) the we must report that determination to the designated integrity and performance system accessible through SAM if all of the following apply:

- (1) The only basis for the determination described in this paragraph (a) is the applicant's prior record of executing programs or activities under Federal awards or its record of integrity and business ethics, as described in § 200.206(a)(2) (i.e., the entity was determined to be qualified based on all factors other than those two standards); and
- (2) The total Federal share of the Federal award that otherwise would be made to the applicant is expected to exceed the simplified acquisition threshold over the period of performance.

If a Monroe County reports a determination that a Applicant is not qualified for a Federal award, as described in paragraph (a) of this section, the Federal awarding agency also must notify the applicant that

- (1) The determination was made and reported to the designated integrity and performance system accessible through SAM, and include with the notification an explanation of the basis for the determination;
- (2) The information will be kept in the system for a period of five years from the date of the determination, as required by section 872 of Public Law 110-417, as amended (41 U.S.C. 2313), then archived;

(3) Each Federal awarding agency that considers making a Federal award to the applicant during that five year period must consider that information in judging whether the applicant qualified to receive the Federal award when the total Federal share of the Federal award is expected to include an amount of Federal funding in excess of the simplified acquisition threshold over the period of performance;

(4) The applicant may go to the awardee integrity and performance portal accessible through SAM (currently the Contractor Performance Assessment Reporting System (CPARS)) and comment on any information the system contains about the applicant itself; and

(5) Monroe County will consider that applicants comments in determining whether the applicant is qualified for a future Federal award.

If Monroe County enters information into the designated integrity and performance system accessible through SAM about a determination that a applicant is not qualified for a Federal award and subsequently:

(1) Learns that any of that information is erroneous, the Federal awarding agency must correct the information in the system within three business days; and

(2) Obtains an update to that information that could be helpful to other Federal awarding agencies, the Federal awarding agency is strongly encouraged to amend the information in the system to incorporate the update in a timely way.

Monroe County will not post any information that will be made publicly available in the non-public segment of designated integrity and performance system that is covered by a disclosure exemption under the Freedom of Information Act. If the sub-recipient asserts within seven calendar days to the Monroe County that some or all of the information made publicly available is covered by a disclosure exemption under the Freedom of Information Act, Monroe County will remove the posting within seven calendar days of receiving the assertion.

#### **SUSPENSION AND DEBARMENT § 200.214**

Sub-recipients are subject to the non-procurement debarment and suspension regulations implementing Executive Orders 12549 and 12689, 2 CFR part 180. The regulations in 2 CFR part 180 restrict awards, sub-awards, and contracts with certain parties that are debarred, suspended, or otherwise excluded from or ineligible for participation in Federal assistance programs or activities.

#### **REMEDIES FOR NONCOMPLIANCE § 200.339**

Standard practice at Monroe County for non-compliance begins with a verbal warning followed by an official written letter and finally termination of the current agreement but depending on the situation, Monroe county uses § 200.339 to determine the best course of action:

If a non-federal entity fails to comply with the U.S. Constitution, Federal statutes, regulations or the terms and conditions of a Federal award, the Federal awarding agency or pass-through entity may impose additional conditions, as described in § 200.208. If the Federal awarding agency or pass-through entity determines that noncompliance cannot be remedied by imposing additional conditions, the Federal

awarding agency or pass-through entity may take one or more of the following actions, as appropriate in the circumstances:

- (a) Temporarily withhold cash payments pending correction of the deficiency by the Sub-recipient or more severe enforcement action by the Federal awarding agency or pass-through entity.
- (b) Disallow (that is, deny both use of funds and any applicable matching credit for) all or part of the cost of the activity or action not in compliance.
- (c) Wholly or partly suspend or terminate the Federal award.
- (d) Initiate suspension or debarment proceedings as authorized under 2 CFR part 180 and Federal awarding agency regulations (or in the case of a pass-through entity, recommend such a proceeding be initiated by a Federal awarding agency).
- (e) Withhold further Federal awards for the project or program.
- (f) Take other remedies that may be legally available.

#### **BUDGET AND PROGRAM MODIFICATIONS § 200.308**

Any requests for programmatic changes will only be considered or accepted by Monroe County when submitted in writing before any changes are made. Moving funding between categories on the budget can also only be done with prior approval from Monroe County.

For non-construction Federal awards, sub-recipients must request prior approvals from Federal awarding agencies for the following program or budget-related reasons:

- (1) Change in the scope or the objective of the project or program (even if there is no associated budget revision requiring prior written approval).
- (2) Change in a key person specified in the application or the Federal award.
- (3) The disengagement from the project for more than three months, or a 25 percent reduction in time devoted to the project, by the approved project director or principal investigator.
- (4) The inclusion, unless waived by the Federal awarding agency, of costs that require prior approval in accordance with subpart E of this part as applicable.
- (5) The transfer of funds budgeted for participant support costs to other categories of expense.
- (6) Unless described in the application and funded in the approved Federal awards, the sub-awarding, transferring or contracting out of any work under a Federal award, including fixed amount sub-awards as described in § 200.333. This provision does not apply to the acquisition of supplies, material, equipment or general support services.
- (7) Changes in the approved cost-sharing or matching provided by the Sub-recipient.
- (8) The need arises for additional Federal funds to complete the project.

Monroe County will consider a one-time extension of the period of performance by up to 12 months unless one or more of the conditions outlined below apply:

- (i) The terms and conditions of the Federal award prohibit the extension.
- (ii) The extension requires additional Federal funds.
- (iii) The extension involves any change in the approved objectives or scope of the project.

For one-time extensions, the sub-recipient must notify the Monroe County in writing with the supporting reasons and revised period of performance at least 10 calendar days before the end of the period of performance specified in the Federal award. This one-time extension must not be exercised merely for the purpose of using unobligated balances. Ex

**Indirect Costs**

Acceptable indirect costs include administrative personnel and accounting any other indirect cost should be approved by Monroe County first.

**REQUIREMENTS FOR PASS-THROUGH ENTITIES § 200.332**

All pass-through entities must:

(a) Ensure that every sub-award is clearly identified to the sub-recipient as a sub-award and includes the following information at the time of the sub-award and if any of these data elements change, include the changes in subsequent sub-award modification. When some of this information is not available, the pass-through entity must provide the best information available to describe the Federal award and sub-award. Required information includes:

(1) Federal award identification.

- (i) Sub-recipient name (which must match the name associated with its unique entity identifier);
- (ii) Sub-recipient's unique entity identifier;
- (iii) Federal Award Identification Number (FAIN);
- (iv) Federal Award Date (see the definition of Federal award date in § 200.1 of this part) of award to the recipient by the Federal agency;
- (v) Sub-award Period of Performance Start and End Date;
- (vi) Sub-award Budget Period Start and End Date;
- (vii) Amount of Federal Funds Obligated by this action by the pass-through entity to the sub-recipient;
- (viii) Total Amount of Federal Funds Obligated to the sub-recipient by the pass-through entity including the current financial obligation;
- (ix) Total Amount of the Federal Award committed to the sub-recipient by the pass-through entity;
- (x) Federal award project description, as required to be responsive to the Federal Funding Accountability and Transparency Act (FFATA);
- (xi) Name of Federal awarding agency, pass-through entity, and contact information for awarding official of the Pass-through entity;
- (xii) Assistance Listings number and Title; the pass-through entity must identify the dollar amount made available under each Federal award and the Assistance Listings Number at time of disbursement;
- (xiii) Identification of whether the award is R&D; and
- (xiv) Indirect cost rate for the Federal award (including if the de minimis rate is charged) per § 200.414.

(2) All requirements imposed by the pass-through entity on the sub-recipient so that the Federal award is used in accordance with Federal statutes, regulations and the terms and conditions of the Federal award;

(3) Any additional requirements that the pass-through entity imposes on the sub-recipient in order for the pass-through entity to meet its own responsibility to the Federal awarding agency including identification of any required financial and performance reports;

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- (4)(i) An approved federally recognized indirect cost rate negotiated between the sub-recipient and the Federal Government. If no approved rate exists, the pass-through entity must determine the appropriate rate in collaboration with the sub-recipient, which is either:
  - (A) The negotiated indirect cost rate between the pass-through entity and the sub-recipient; which can be based on a prior negotiated rate between a different PTE and the same sub-recipient. If basing the rate on a previously negotiated rate, the pass-through entity is not required to collect information justifying this rate, but may elect to do so;
  - (B) The de minimis indirect cost rate.
- (ii) The pass-through entity must not require use of a de minimis indirect cost rate if the sub-recipient has a federally approved rate. Sub-recipients can elect to use the cost allocation method to account for indirect costs in accordance with § 200.405(d).
- (5) A requirement that the sub-recipient permit the pass-through entity and auditors to have access to the sub-recipient's records and financial statements as necessary for the pass-through entity to meet the requirements of this part; and
- (6) Appropriate terms and conditions concerning closeout of the sub-award.

(b) Evaluate each sub-recipient's risk of noncompliance with Federal statutes, regulations, and the terms and conditions of the sub-award for purposes of determining the appropriate sub-recipient monitoring described in paragraphs (d) and (e) of this section, which may include consideration of such factors as:

- (1) The sub-recipient's prior experience with the same or similar sub-awards;
- (2) The results of previous audits including whether or not the sub-recipient receives a Single Audit in accordance with Subpart F of this part, and the extent to which the same or similar sub-award has been audited as a major program;
- (3) Whether the sub-recipient has new personnel or new or substantially changed systems; and
- (4) The extent and results of Federal awarding agency monitoring (e.g., if the sub-recipient also receives Federal awards directly from a Federal awarding agency).

(c) Consider imposing specific sub-award conditions upon a sub-recipient if appropriate as described in § 200.208.

(d) Monitor the activities of the sub-recipient as necessary to ensure that the sub-award is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the sub-award; and that sub-award performance goals are achieved. Pass-through entity monitoring of the sub-recipient must include:

- (1) Reviewing financial and performance reports required by the pass-through entity.
- (2) Following-up and ensuring that the sub-recipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the sub-recipient from the pass-through entity detected through audits, on-site reviews, and written confirmation from the sub-recipient, highlighting the status of actions planned or taken to address Single Audit findings related to the particular sub-award.
- (3) Issuing a management decision for applicable audit findings pertaining only to the Federal award provided to the sub-recipient from the pass-through entity as required by § 200.521.
- (4) The pass-through entity is responsible for resolving audit findings specifically related to the sub-award and not responsible for resolving crosscutting findings. If a sub-recipient has a current Single Audit report posted in the Federal Audit Clearinghouse and has not otherwise been excluded from receipt of Federal funding (e.g., has been debarred or suspended), the pass-through entity may rely on

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the sub-recipient's cognizant audit agency or cognizant oversight agency to perform audit follow-up and make management decisions related to cross-cutting findings in accordance with section § 200.513(a)(3)(vii). Such reliance does not eliminate the responsibility of the pass-through entity to issue sub-awards that conform to agency and award-specific requirements, to manage risk through ongoing sub-award monitoring, and to monitor the status of the findings that are specifically related to the sub-award.

(e) Depending upon the pass-through entity's assessment of risk posed by the sub-recipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals:

- (1) Providing sub-recipients with training and technical assistance on program-related matters; and
  - (2) Performing on-site reviews of the sub-recipient's program operations;
  - (3) Arranging for agreed-upon-procedures engagements as described in § 200.425.
- (f) Verify that every sub-recipient is audited as required by Subpart F of this part when it is expected that the sub-recipient's Federal awards expended during the respective fiscal year equaled or exceeded the threshold set forth in § 200.501.

(g) Consider whether the results of the sub-recipient's audits, on-site reviews, or other monitoring indicate conditions that necessitate adjustments to the pass-through entity's own records.

(h) Consider taking enforcement action against noncompliant sub-recipients as described in § 200.339 of this part and in program regulations.

#### **METHODS OF PROCUREMENT § 200.320**

The Sub-recipient must have and use documented procurement procedures, consistent with the standards of this 2 CFR 200 for any of the following methods of procurement used for the acquisition of property or services required under a Federal award or sub-award:

**(a) Informal procurement methods.** When the value of the procurement for property or services under a Federal award does not exceed the simplified acquisition threshold (SAT), as defined in § 200.1, or a lower threshold established by a Sub-recipient, formal procurement methods are not required. The Sub-recipient may use informal procurement methods to expedite the completion of its transactions and minimize the associated administrative burden and cost. The informal methods used for procurement of property or services at or below the SAT include:

##### **(1) Micro-purchases -**

- (i) Distribution. The acquisition of supplies or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold (See the definition of micro-purchase in § 200.1). To the maximum extent practicable, the Sub-recipient should distribute micro-purchases equitably among qualified suppliers.
- (ii) Micro-purchase awards. Micro-purchases may be awarded without soliciting competitive price or rate quotations if the Sub-recipient considers the price to be reasonable based on research, experience, purchase history or other information and documents it files accordingly. Purchase

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cards can be used for micro-purchases if procedures are documented and approved by the Sub-recipient.

(iii) Micro-purchase thresholds. The Sub-recipient is responsible for determining and documenting an appropriate micro-purchase threshold based on internal controls, an evaluation of risk, and its documented procurement procedures. The micro-purchase threshold used by the Sub-recipient must be authorized or not prohibited under State, local, or tribal laws or regulations. Non-Federal entities may establish a threshold higher than the Federal threshold established in the Federal Acquisition Regulations (FAR) in accordance with paragraphs (a)(1)(iv) and (v) of this section.

(iv) Sub-recipient increase to the micro-purchase threshold up to \$50,000. Non-Federal entities may establish a threshold higher than the micro-purchase threshold identified in the FAR in accordance with the requirements of this section. The Sub-recipient may self-certify a threshold up to \$50,000 on an annual basis and must maintain documentation to be made available to the Federal awarding agency and auditors in accordance with § 200.334. The self-certification must include a justification, clear identification of the threshold, and supporting documentation of any of the following:

(A) A qualification as a low-risk auditee, in accordance with the criteria in § 200.520 for the most recent audit;

(B) An annual internal institutional risk assessment to identify, mitigate, and manage financial risks; or,

(C) For public institutions, a higher threshold consistent with State law.

(v) Sub-recipient increase to the micro-purchase threshold over \$50,000. Micro-purchase thresholds higher than \$50,000 must be approved by the cognizant agency for indirect costs. The Sub-recipient must submit a request with the requirements included in paragraph (a)(1)(iv) of this section. The increased threshold is valid until there is a change in status in which the justification was approved.

## **(2) Small purchases -**

(i) Small purchase procedures. The acquisition of property or services, the aggregate dollar amount of which is higher than the micro-purchase threshold but does not exceed the simplified acquisition threshold. If small purchase procedures are used, price or rate quotations must be obtained from an adequate number of qualified sources as determined appropriate by the Sub-recipient.

(ii) Simplified acquisition thresholds. The Sub-recipient is responsible for determining an appropriate simplified acquisition threshold based on internal controls, an evaluation of risk and its documented procurement procedures which must not exceed the threshold established in the FAR. When applicable, a lower simplified acquisition threshold used by the Sub-recipient must be authorized or not prohibited under State, local, or tribal laws or regulations.

**(b) Formal procurement methods.** When the value of the procurement for property or services under a Federal financial assistance award exceeds the SAT, or a lower threshold established by a Sub-recipient, formal procurement methods are required. Formal procurement methods require following documented procedures. Formal procurement methods also require public advertising unless a non-competitive procurement can be used in accordance with § 200.319 or paragraph (c) of this section. The following formal methods of procurement are used for procurement of property or services above the simplified acquisition threshold or a value below the simplified acquisition threshold the Sub-recipient determines to be appropriate:

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**(1) Sealed bids.** A procurement method in which bids are publicly solicited and a firm fixed-price contract (lump sum or unit price) is awarded to the responsible bidder whose bid, conforming to all the material terms and conditions of the invitation for bids, is the lowest in price. The sealed bids method is the preferred method for procuring construction, if the conditions.

(i) In order for sealed bidding to be feasible, the following conditions should be present:

- (A) A complete, adequate, and realistic specification or purchase description is available;
  - (B) Two or more responsible bidders are willing and able to compete effectively for the business;
- and
- (C) The procurement lends itself to a firm fixed price contract and the selection of the successful bidder can be made principally on the basis of price.

(ii) If sealed bids are used, the following requirements apply:

- (A) Bids must be solicited from an adequate number of qualified sources, providing them sufficient response time prior to the date set for opening the bids, for local, and tribal governments, the invitation for bids must be publicly advertised;
- (B) The invitation for bids, which will include any specifications and pertinent attachments, must define the items or services in order for the bidder to properly respond;
- (C) All bids will be opened at the time and place prescribed in the invitation for bids, and for local and tribal governments, the bids must be opened publicly;
- (D) A firm fixed price contract award will be made in writing to the lowest responsive and responsible bidder. Where specified in bidding documents, factors such as discounts, transportation cost, and life cycle costs must be considered in determining which bid is lowest. Payment discounts will only be used to determine the low bid when prior experience indicates that such discounts are usually taken advantage of; and
- (E) Any or all bids may be rejected if there is a sound documented reason.

**(2) Proposals.** A procurement method in which either a fixed price or cost-reimbursement type contract is awarded. Proposals are generally used when conditions are not appropriate for the use of sealed bids. They are awarded in accordance with the following requirements:

- (i) Requests for proposals must be publicized and identify all evaluation factors and their relative importance. Proposals must be solicited from an adequate number of qualified offerors. Any response to publicized requests for proposals must be considered to the maximum extent practical;
- (ii) The Sub-recipient must have a written method for conducting technical evaluations of the proposals received and making selections;
- (iii) Contracts must be awarded to the responsible offeror whose proposal is most advantageous to the Sub-recipient, with price and other factors considered; and
- (iv) The Sub-recipient may use competitive proposal procedures for qualifications-based procurement of architectural/engineering (A/E) professional services whereby offeror's qualifications are evaluated and the most qualified offeror is selected, subject to negotiation of fair and reasonable compensation. The method, where price is not used as a selection factor, can only be used in procurement of A/E professional services. It cannot be used to purchase other types of services though A/E firms that are a potential source to perform the proposed effort.

**(c) Noncompetitive procurement.** There are specific circumstances in which noncompetitive procurement can be used. Noncompetitive procurement can only be awarded if one or more of the following circumstances apply:

- (1) The acquisition of property or services, the aggregate dollar amount of which does not exceed the micro-purchase threshold;
- (2) The item is available only from a single source;
- (3) The public exigency or emergency for the requirement will not permit a delay resulting from publicizing a competitive solicitation;
- (4) The Federal awarding agency or pass-through entity expressly authorizes a noncompetitive procurement in response to a written request from the Sub-recipient; or
- (5) After solicitation of a number of sources, competition is determined inadequate.

#### **TERMINATION OF ASSISTANCE**

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The following is Monroe County's policy regarding both termination of ESG assistance and the process for clients to pursue challenges to an agency's decision to deny ESG assistance. ESG sub-recipients must adopt this or a similar policy that shall be provided to members of the public if requesting assistance with ESG funds, regardless of whether or not the applicant is accepted into the ESG program:

**Termination Policy:** Sub-recipients may terminate assistance to a program participant who violates program requirements. Sub-recipients may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the sub-recipient must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law. The process, at a minimum, should consist of:

- Written notice to the program participant containing a clear statement of the reasons for termination;
- 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 (or a subordinate of that person) who made or approved the termination decision; and
- Prompt written notice of the final decision to the program participant.

Sub-recipients must also make every effort to ensure that clients discharged from ESG assistance, either due to termination due to violation of program requirements or because a program participant has reached the maximum number of months that they are eligible for assistance, are not discharged into the streets or into an unstable housing situation.

**Grievance Policy:** Each sub-recipient is required to establish a formal process, in writing and available to potential clients, that includes necessary steps needed to challenge an agency's decision to deny ESG assistance. The procedure should contact information at the local agency, and the HUD contact in Buffalo.

Denial of assistance may include, but is not limited to, the individual or household's ineligibility for the program or failure to provide verifiable evidence of eligibility, etc. Sub-recipients must have a procedure that governs applicant denial and grievance processes. These procedures should describe the program requirements and how an applicant did not qualify or was denied. The grievance procedure could be the same as a program participant terminated. This would include, for example, allowing applicants to request a hearing regarding the termination of their denial. The termination, denial, and grievance procedures should be readily available to participants either in written information or by posting the in a public place.

It is critical to the nature of ESG and transparency to effectively communicate these procedures to program participants and ensure that the procedures are fully understood.

Staff members of Monroe County and its sub-recipient service providers, including employees, volunteers, affiliates, contractors and associates, are required to comply with this grievance policy.

## **Emergency Shelter (ES) Written Standards**

**Definition: Emergency Shelter (24 CFR 576.2)**

Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which do not require the occupants to sign leases or occupancy agreements.

The Emergency Shelter system currently consists of nineteen (19) shelters; sixteen (16) are year-round and three (3) are seasonal. In addition to the emergency housing programs, the Monroe County Department of Human Services can provide vouchers for hotel placements. The role of the emergency shelters in the CoC homeless system is to provide immediate safe shelter, with few or no barriers to admission.

Emergency Shelter can be accessed through MCDHS, "2-1-1", hot-lines (DV and youth), self-referral (calling or going to a shelter), referrals from other community organizations, sent to shelter by hospitals or law enforcement.

**Primary Access for Sub-Populations:**

- Victims of Domestic Violence 24-hour Hotline: 585-222-SAFE (7133)  
24-hour TTY: 585-232-1741
- Unaccompanied Youth (ages 12 – 18) and young adults (ages 18 – 24): 585-271-7670  
Or 2-1-1

**Eligibility Criteria:**

- Must be literally homeless
- Fleeing Domestic Violence
- Unaccompanied Youth (ages 16-17)
- Runaway Youth (not HUD Homeless)

**Operational Standards** – Standards represent minimum local standards for all Emergency Shelters. Shelters may have funders who have additional requirements and/or may need to meet standards of the state or local government. In those cases, the more stringent standard applies.

- A daily census of current participants must be kept in a central location;
- Food and basic personal care items will be provided;
- Emergency shelters will relax their standards and/or increase their occupancy (must still meet fire codes) during Code Blue conditions;
- Emergency shelters who serve children may have additional entry requirements to ensure the safety of children in the program;
- Emergency Shelters will have written discharge policies and procedures that provide a consistent approach and enforced in a consistent manner. Must provide due process and grievance procedure.

- Whenever possible participants will not be asked to leave shelter evenings or weekends for reasons other than health or safety. On the rare occasions this does occur, shelter staff will follow After-Hour Discharge Procedures.
- Shelters, at a minimum, will provide the following services (Services can be provided by shelter staff or by another community based organization):
  - Completion of Assessment Tool – VSPDAT
  - Making referrals to the Coordinated Entry Prioritization List
  - Assistance with accessing permanent or other appropriate housing
  - Assistance with accessing mainstream resources

**Standard Outcomes/Performance Measures**

- Average length of stay is less than 30 days
- 60% of participants exit with a successful housing outcome
- 50% of participants exit to permanent housing
- Less than 20% of participants exit to an unknown location
- 50% of participants exit with/linked to cash income
- 60% of participants exit with/linked to non-cash resources
- Minimum 90% average occupancy rate will be maintained

## Rapid Re-Housing (RRH) Written Standards

**Definition: Rapid Re-Housing (RRH) – 24 CFR Part 578.37**

RRH provides short-term (up to 3 months) and/or medium term (3 to 24 months) tenant based rental assistance and supportive services as necessary to help a homeless individual or family, with or without disabilities, move as quickly as possible to permanent housing and achieve stability in that housing.

Access to Rapid Re-Housing (RRH) is through:

- Coordinated Entry Community Prioritization list

**Eligibility Criteria**

- Must meet HUD Definition of Homeless (Categories 1 or 4)
- Prior living situation must be ES or Unsheltered
- VSPDAT score will generally be in the 4-7 range

**Operational Standards** - Standards represent minimum local standards for all PSH programs. PSH providers may have funders who have additional requirements and/or may need to meet standards of the state or local government. In those cases, the more stringent standard applies.

- Core components required of every RRH program
  - Housing Search:
    - must include a plan to work with landlords to encourage them to provide available units for the program
    - rental units must pass inspection prior to rental assistance being paid to the landlord; for ESG funded programs Housing Habitability Inspection can be utilized; for CoC funded programs Housing Quality Standards (HQS) inspection is required
  - Rent and Move-In Assistance: must include at a minimum short or medium term rental assistance.
    - Each program will determine the average amount and length of time rental assistance is provided and the percentage of rent that participants will pay
    - For participants where rent does not include utilities, the amount of rental assistance provided will incorporate the applicable utility allowance established by the Rochester Housing Authority will be used to calculate the tenant share of rent. Program participant must be reimbursed for any amount that the allowance exceeds the participant's share of rent.
  - Case Management Services:
    - Initial focus is on accessing PH
    - Once housing is secured, focus changes to housing stabilization;
    - Case management ends when household is no longer imminently at risk of being homeless;
    - A once per month contact at the minimum is required while participant is enrolled in the RRH program;
    - Warm hand-off to mainstream and community based services should be utilized
- Each participant must have a written lease/rental agreement.
  - ESG funded programs - month to month is allowable;

- CoC funded programs - initial lease must be for at least one year, that is renewable and terminable by cause
- Program participation is limited to a maximum of 24 months
- All programs will utilize Housing First principles

**Standard Outcomes/Performance Measures**

- 92% of all participants will remain stable in RRH or exit to other permanent housing destinations
- 64% or more of adult participants will have non-cash benefits
- 64% or more of adult participants will have income from sources other than employment
- 20% or more of adult participants increase income from sources other than employment
- 20% or more of adult participants will have income from employment
- 20% or more of adult participants will increase income from employment
- 92% of participants do not return to homelessness within a one-year period after exit from RRH
- 85% of participants do not return to homelessness within a two-year period after exit from RRH
- Average time from program enrollment to moving to permanent housing is (30) thirty days
- Minimum 95% occupancy rate based on number of households projected to be served in application and amount of rental assistance that is expended annually

## **Street Outreach (SO) Written Standards**

### **Definition: Street Outreach (SO) - 24 CFR 576.101**

Street Outreach provides essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing or an appropriate health facility

### **Eligibility Criteria**

- Must meet HUD Definition of Homeless

### **Operational Standards**

- Proactively reach out to unsheltered homeless; whenever possible, provide resources to address immediate needs such as placement in emergency shelter, food, personal hygiene items, etc. Priority for Street Outreach will be unsheltered homeless; however, street outreach teams may also go to shelters that are not able to provide services.
- Provide Engagement services – assessing housing and service needs, completion of VSPDAT and other assessment tools based on need
- Provide short term case management - provide linkages to emergency health and behavioral health services, mainstream resources, etc.
- Provide transportation to emergency shelters or other services
- Street Outreach activities will be conducted with a minimum of (2) two trained persons whenever possible; or outreach worker will always let someone know where they will be
- Should an unsheltered household with minor children be encountered during outreach activities:
  - A placement into shelter must be made
  - If placement is refused call 9-1-1 or CPS Hotline: 1-800-342-3720

### **Standard Outcomes/Performance Measures**

- 30% of all participants engaged who will exit to permanent housing destinations
- 30% of all participants engaged who have successful exits from the program
- 70% or more of adult participants will have non-cash benefits
- 60% or more of adult participants will have income from sources other than employment
- 15% or more of adult participants will have income from employment
- 80% of participants will not return to homelessness within two years
- Average time from contact to engagement is 60 days
- Average time from engagement to successful exit from program is 45 days



Grantee SF-424's and Certification(s)

OMB Number: 4340-0044  
Expiration Date: 12/31/2022

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate initial(s): _____ * Other (Specify): _____
* 3. Date Received: 10/17/2022	4. Applicant Identifier: _____	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
<b>B. APPLICANT INFORMATION:</b>		
* a. Legal Name: <u>Herkese County</u>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <u>16-604543</u>	* e. UE: <u>HERKESSE COUNTY</u>	
d. Address:		
* Street: <u>50 N. Main Street</u>	Street: <u>1150 City Place</u>	
* City: <u>Perchey</u>	City: _____	
* County/Parish: <u>Herkese</u>	County/Parish: _____	
* State: <u>NY: New York</u>	State: _____	
* Province: _____	Province: _____	
* Country: <u>USA: OHIO STATES</u>	Country: _____	
* Zip / Postal Code: <u>14620-1293</u>	Zip / Postal Code: _____	
e. Organizational Unit:		
Department Name: <u>Planning and Development</u>	Division Name: <u>Community Development</u>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <u>Ms.</u>	* First Name: <u>Quach</u>	Middle Name: _____
* Last Name: <u>Quach</u>	Suffix: _____	
Title: <u>Community Development Manager</u>		
Organizational Affiliation: <u>Herkese County Department of Planning and Development</u>		
* Telephone Number: <u>505-753-2000</u>	* Fax Number: <u>505-753-2028</u>	
* Email: <u>equach@herkesecounty.gov</u>		

Application for Federal Assistance SF-424	
<p>* 8. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="D: County Government"/> <p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/> <p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/> <p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14-235"/> <p>CFDA Title:</p> <input type="text"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="N/A"/> <p>* Title:</p> <input type="text" value="N/A"/>	
<p>13. Competition Identification Number:</p> <input type="text"/> <p>Title:</p> <input type="text"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/> <p style="text-align: right;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </p>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="Community Development Block Grant (CDBG)"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <p style="text-align: right;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </p>	

Application for Federal Assistance SF-424

16. Congressional Districts Of:

\* a. Applicant:  \* b. Program/Project:

Attach an additional list of Program/Project Congressional Districts if needed.

17. Proposed Project:

\* a. Start Date:  \* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="1,821,604.00"/>
* b. Applicant	<input type="text"/>
* c. State	<input type="text"/>
* d. Local	<input type="text"/>
* e. Other	<input type="text"/>
* f. Program Income	<input type="text" value="62,143.00"/>
* g. TOTAL	<input type="text" value="1,883,747.00"/>

\* 19. Is Application Subject to Review By State Under Executive Order 12372 Process?

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372

\* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)

Yes  No

If "Yes", provide explanation and attach

21. By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)

\*\* I AGREE

\*\* The list of certifications and assurances or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix:  \* First Name:

Middle Name:


\* Last Name:


Email:

\* Title:

\* Telephone Number:  Fax Number:

\* Email:

\* Signature of Authorized Representative:  \* Date Signed:



CDBG

ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 40-4-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4720-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 800, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made, and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11736; (c) protection of wetlands pursuant to EO 11990; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1986, as amended (16 U.S.C. §470), EO 11593 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.


SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Huerfano County Executive
APPLICANT ORGANIZATION Huerfano County	DATE SUBMITTED 06/17/2022

SF-424D (Rev. 1-97) Back



Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): _____ * Other (Specify): _____
* 3. Date Received: 01/27/22	* 4. Applicant Identifier: _____	
5a. Federal Entity Identifier: _____	5b. Federal Award Identifier: _____	
State Use Only:		
6. Date Received by State: _____	7. State Application Identifier: _____	
* 8. APPLICANT INFORMATION:		
* a. Legal Name: Monroe County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 16-6002543	* c. UEI: M3EYKRFM4X7	
* d. Address:		
* Street1: 50 W Main Street	_____	
* Street2: 1150 Coxy Piece	_____	
* City: Rochester	_____	
* County/Parish: Monroe	_____	
* State: NY; New York	_____	
* Province: _____	_____	
* Country: USA, UNITED STATES	_____	
* Zip / Postal Code: 14614-1293	_____	
* e. Organizational Unit:		
* Department Name: Planning and Development	* Division Name: Community Development	
* f. Name and contact information of person to be contacted on matters involving this application:		
* Prefix: He.	* First Name: Chant	
* Middle Name: _____	_____	
* Last Name: Couch	_____	
* Suffix: _____	_____	
* Title: Community Development Manager		
* Organizational Affiliation: Monroe County Department of Planning and Development		
* Telephone Number: 505-753-2000	* Fax Number: 505-753-2028	
* Email: ccouch@monroecounty.gov		

Application for Federal Assistance SF-424	
* 9. Type of Applicant 1: Select Applicant Type:	<input type="text" value="County Government"/>
Type of Applicant 2: Select Applicant Type:	<input type="text"/>
Type of Applicant 3: Select Applicant Type:	<input type="text"/>
* Other (Specify):	<input type="text"/>
* 10. Name of Federal Agency:	<input type="text" value="U.S. Department of Housing and Urban Development"/>
11. Catalog of Federal Domestic Assistance Number:	<input type="text" value="14-229"/>
CFDA Title:	<input type="text"/>
* 12. Funding Opportunity Number:	<input type="text" value="N/A"/>
* Title:	<input type="text" value="N/A"/>
13. Competition Identification Number:	<input type="text"/>
Title:	<input type="text"/>
14. Areas Affected by Project (Cities, Counties, States, etc.):	<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>
* 15. Descriptive Title of Applicant's Project:	<input type="text" value="Emergency Solutions Grant (ESG)"/>
Attach supporting documents as specified in agency instructions	<input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/>

<b>Application for Federal Assistance 5F-424</b>	
<b>16. Congressional Districts Of:</b>	
* a. Applicant: NY 25	* b. Program/Project: NY 25
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
<b>17. Proposed Project:</b>	
* a. Start Date: 01/21/2022	* b. End Date: 07/31/2023
<b>18. Estimated Funding (\$):</b>	
* a. Federal	150,041.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	
* g. TOTAL	150,041.00
* 19. Is Application Subject to Review By State Under Executive Order 12372 Process? <input type="checkbox"/> a. This application was made available to the State under the Executive Order 12372 Process for review on: <input type="text"/> <input type="checkbox"/> b. Program is subject to E.O. 12372 but has not been selected by the State for review. <input checked="" type="checkbox"/> c. Program is not covered by E.O. 12372.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.) <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes", provide explanation and attach: <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. "By signing this application, I certify (1) to the statements contained in the list of certifications" and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances" and agree to comply with any resulting terms (1) except on award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1061) <input checked="" type="checkbox"/> ** I AGREE ** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.	
<b>Authorized Representative:</b>	
Prefix: Hon.	* First Name: Adam
Address Name: J	
* Last Name: Bello	
Suffix:	
* Title: County Executive	
* Telephone Number: 585-753-1000	* Fax Number: 585-753-1014
* Email: countyexecutive@monterocounty.gov	
* Signature of Authorized Representative: 	* Date Signed: 06/17/2022





## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0009  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of OPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 600, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 92-255), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-618), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 527 of the Public Health Service Act of 1912 (42 U.S.C. §§290 dd-3 and 290 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§3601 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Standard Form 424D (Rev. 7-97)  
Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-546) which provide for fair and equitable treatment of persons displaced or whose property is ~~acquired as a result of Federal and federally-assisted~~ programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1508 and 7324-7328) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§278a to 278a-7), the Copeland Act (40 U.S.C. §278c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514; (b) notification of violating facilities pursuant to EO 11738; (c) protection of wetlands pursuant to EO 11980; (d) evaluation of flood hazards in floodplains in accordance with EO 11988; (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 175(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 106 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11593 (Identification and protection of historic properties), and the Archaeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 106(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.


SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Monroe County Executive
APPLICANT ORGANIZATION Monroe County	DATE SUBMITTED 06/17/2022

SF-424D (Rev. 7-97) Back



Application for Federal Assistance SF-424		
* 1. Type of Submission <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received 06/17/2023	4. Applicant Identifier: <input type="text"/>	
3a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: Monroe County		
* b. Employer/Taxpayer Identification Number (EIN/TIN): 15-5002563	* c. UEI: H3B67261487	
d. Address:		
* Street: Street1: Street2:	23 W. Main Street 1150 City Place	
* City:	Beecher	
* County/Parish:	Monroe	
* State:	NY: New York	
* Province:	<input type="text"/>	
* Country:	USA - UNITED STATES	
* Zip/Postal Code:	74614-1293	
e. Organizational Unit:		
Department Name: Planning and Development	Division Name: Community Development	
f. Name and contact information of person to be contacted on matters involving this application:		
* Prefix: Mr.	* First Name: Quach	* Last Name: Quach
* Middle Name:	<input type="text"/>	
* Last Name: Quach	<input type="text"/>	
* Suffix:	<input type="text"/>	
* Title: Community Development Manager		
* Organizational Affiliation: Monroe County Department of Planning and Development		
* Telephone Number: 585-753-2000	* Fax Number: 585-753-2028	
* Email: cquach@monroecounty.gov		

Application for Federal Assistance SF-424	
<p>* 8. Type of Applicant 1: Select Applicant Type:</p> <input type="text" value="County Government"/>	
<p>Type of Applicant 2: Select Applicant Type:</p> <input type="text"/>	
<p>Type of Applicant 3: Select Applicant Type:</p> <input type="text"/>	
<p>* Other (specify):</p> <input type="text"/>	
<p>* 10. Name of Federal Agency:</p> <input type="text" value="U.S. Department of Housing and Urban Development"/>	
<p>11. Catalog of Federal Domestic Assistance Number:</p> <input type="text" value="14-296"/>	
<p>CFDA Title:</p> <input type="text"/>	
<p>* 12. Funding Opportunity Number:</p> <input type="text" value="N/A"/>	
<p>* Title:</p> <input type="text" value="N/A"/>	
<p>13. Competition Ident/Revision Number:</p> <input type="text"/>	
<p>Title:</p> <input type="text"/>	
<p>14. Areas Affected by Project (Cities, Counties, States, etc.):</p> <input type="text"/>	
<p style="text-align: right;"> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/> </p>	
<p>* 15. Descriptive Title of Applicant's Project:</p> <input type="text" value="New Investment Partnership Program (NIP)"/>	
<p>Attach supporting documents as specified in agency instructions.</p> <p style="text-align: right;"> <input type="button" value="Add Attachments"/> <input type="button" value="Delete Attachments"/> <input type="button" value="View Attachments"/> </p>	

Application for Federal Assistance SF-424	
16. Congressional Districts Of:	
* a. Applicant: NY 25	* b. Program/Project: NY 25
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
17. Proposed Project:	
* a. Start Date: 03/31/2022	* b. End Date: 07/31/2023
18. Estimated Funding (\$):	
* a. Federal	1,357,515.00
* b. Applicant	
* c. State	
* d. Local	
* e. Other	
* f. Program Income	137,924.00
* g. TOTAL	1,475,439.00
* 19. Is Application Subject to Review By State Under Executive Order 12872 Process?	
<input type="checkbox"/> a. This application was made available to the State under the Executive Order 12872 Process for review on <input type="text"/> .	
<input type="checkbox"/> b. Program is subject to E.O. 12872 but has not been selected by the State for review.	
<input checked="" type="checkbox"/> c. Program is not covered by E.O. 12872.	
* 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)	
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	
If "Yes", provide explanation and attach	
<input type="text"/> <input type="button" value="Add Attachment"/> <input type="button" value="Delete Attachment"/> <input type="button" value="View Attachment"/>	
21. *By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 28, Section 1001)	
<input checked="" type="checkbox"/> ** I AGREE	
** The list of certifications and assurances, or an internal site where you may obtain this list, is contained in the announcement or agency specific instructions.	
Authorized Representative:	
Prefix: Hon.	* First Name: Belia
Middle Name: J	
* Last Name: Della	
Suffix:	
* Title: County Executive	
* Telephone Number: 585-753-1000	* Fax Number: 585-753-1014
* Email: countyexecutive@monroecounty.gov	
* Signature of Authorized Representative: 	* Date Signed: 06/17/2022



## ASSURANCES - CONSTRUCTION PROGRAMS

OMB Number: 4040-0908  
Expiration Date: 02/28/2025

Public reporting burden for this collection of information is estimated to average 15 minutes per response, including time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of Management and Budget, Paperwork Reduction Project (0348-0042), Washington, DC 20503.

**PLEASE DO NOT RETURN YOUR COMPLETED FORM TO THE OFFICE OF MANAGEMENT AND BUDGET. SEND IT TO THE ADDRESS PROVIDED BY THE SPONSORING AGENCY.**

**NOTE:** Certain of these assurances may not be applicable to your project or program. If you have questions, please contact the Awarding Agency. Further, certain Federal assistance awarding agencies may require applicants to certify to additional assurances. If such is the case, you will be notified.

As the duly authorized representative of the applicant, I certify that the applicant:


1. Has the legal authority to apply for Federal assistance, and the institutional, managerial and financial capability (including funds sufficient to pay the non-Federal share of project costs) to ensure proper planning, management and completion of project described in this application.
2. Will give the awarding agency, the Comptroller General of the United States and, if appropriate, the State, the right to examine all records, books, papers, or documents related to the assistance; and will establish a proper accounting system in accordance with generally accepted accounting standards or agency directives.
3. Will not dispose of, modify the use of, or change the terms of the real property title or other interest in the site and facilities without permission and instructions from the awarding agency. Will record the Federal awarding agency directives and will include a covenant in the title of real property acquired in whole or in part with Federal assistance funds to assure non-discrimination during the useful life of the project.
4. Will comply with the requirements of the assistance awarding agency with regard to the drafting, review and approval of construction plans and specifications.
5. Will provide and maintain competent and adequate engineering supervision at the construction site to ensure that the complete work conforms with the approved plans and specifications and will furnish progressive reports and such other information as may be required by the assistance awarding agency or State.
6. Will initiate and complete the work within the applicable time frame after receipt of approval of the awarding agency.
7. Will establish safeguards to prohibit employees from using their positions for a purpose that constitutes or presents the appearance of personal or organizational conflict of interest, or personal gain.
8. Will comply with the Intergovernmental Personnel Act of 1970 (42 U.S.C. §§4726-4763) relating to prescribed standards of merit systems for programs funded under one of the 19 statutes or regulations specified in Appendix A of GPM's Standards for a Merit System of Personnel Administration (5 C.F.R. 900, Subpart F).
9. Will comply with the Lead-Based Paint Poisoning Prevention Act (42 U.S.C. §§4801 et seq.) which prohibits the use of lead-based paint in construction or rehabilitation of residence structures.
10. Will comply with all Federal statutes relating to non-discrimination. These include but are not limited to: (a) Title VI of the Civil Rights Act of 1964 (P.L. 88-352) which prohibits discrimination on the basis of race, color or national origin; (b) Title IX of the Education Amendments of 1972, as amended (20 U.S.C. §§1681-1683, and 1685-1686), which prohibits discrimination on the basis of sex; (c) Section 504 of the Rehabilitation Act of 1973, as amended (29 U.S.C. §794), which prohibits discrimination on the basis of handicaps; (d) the Age Discrimination Act of 1975, as amended (42 U.S.C. §§6101-6107), which prohibits discrimination on the basis of age; (e) the Drug Abuse Office and Treatment Act of 1972 (P.L. 82-256), as amended relating to nondiscrimination on the basis of drug abuse; (f) the Comprehensive Alcohol Abuse and Alcoholism Prevention, Treatment and Rehabilitation Act of 1970 (P.L. 91-616), as amended, relating to nondiscrimination on the basis of alcohol abuse or alcoholism; (g) §§523 and 627 of the Public Health Service Act of 1912 (42 U.S.C. §§260 dd-3 and 260 ee 3), as amended, relating to confidentiality of alcohol and drug abuse patient records; (h) Title VIII of the Civil Rights Act of 1968 (42 U.S.C. §§8801 et seq.), as amended, relating to nondiscrimination in the sale, rental or financing of housing; (i) any other nondiscrimination provisions in the specific statute(s) under which application for Federal assistance is being made; and (j) the requirements of any other nondiscrimination statute(s) which may apply to the application.

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Prescribed by OMB Circular A-102

11. Will comply, or has already complied, with the requirements of Titles II and III of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (P.L. 91-646) which provide for fair and equitable treatment of persons displaced or whose property is acquired as a result of Federal and federally-assisted programs. These requirements apply to all interests in real property acquired for project purposes regardless of Federal participation in purchases.
12. Will comply with the provisions of the Hatch Act (5 U.S.C. §§1501-1506 and 7324-7323) which limit the political activities of employees whose principal employment activities are funded in whole or in part with Federal funds.
13. Will comply, as applicable, with the provisions of the Davis-Bacon Act (40 U.S.C. §§276a to 276a-7), the Copeland Act (40 U.S.C. §276c and 18 U.S.C. §874), and the Contract Work Hours and Safety Standards Act (40 U.S.C. §§327-333) regarding labor standards for federally-assisted construction subagreements.
14. Will comply with flood insurance purchase requirements of Section 102(a) of the Flood Disaster Protection Act of 1973 (P.L. 93-234) which requires recipients in a special flood hazard area to participate in the program and to purchase flood insurance if the total cost of insurable construction and acquisition is \$10,000 or more.
15. Will comply with environmental standards which may be prescribed pursuant to the following: (a) institution of environmental quality control measures under the National Environmental Policy Act of 1969 (P.L. 91-190) and Executive Order (EO) 11514, (b) notification of violating facilities pursuant to EO 11738, (c) protection of wetlands pursuant to EO 11990, (d) evaluation of flood hazards in floodplains in accordance with EO 11988, (e) assurance of project consistency with the approved State management program developed under the Coastal Zone Management Act of 1972 (16 U.S.C. §§1451 et seq.); (f) conformity of Federal actions to State (Clean Air) implementation Plans under Section 176(c) of the Clean Air Act of 1955, as amended (42 U.S.C. §§7401 et seq.); (g) protection of underground sources of drinking water under the Safe Drinking Water Act of 1974, as amended (P.L. 93-523); and, (h) protection of endangered species under the Endangered Species Act of 1973, as amended (P.L. 93-205).
16. Will comply with the Wild and Scenic Rivers Act of 1968 (16 U.S.C. §§1271 et seq.) related to protecting components or potential components of the national wild and scenic rivers system.
17. Will assist the awarding agency in assuring compliance with Section 105 of the National Historic Preservation Act of 1966, as amended (16 U.S.C. §470), EO 11583 (identification and protection of historic properties), and the Archeological and Historic Preservation Act of 1974 (16 U.S.C. §§469a-1 et seq.).
18. Will cause to be performed the required financial and compliance audits in accordance with the Single Audit Act Amendments of 1996 and OMB Circular No. A-133, "Audits of States, Local Governments, and Non-Profit Organizations."
19. Will comply with all applicable requirements of all other Federal laws, executive orders, regulations, and policies governing this program.
20. Will comply with the requirements of Section 105(g) of the Trafficking Victims Protection Act (TVPA) of 2000, as amended (22 U.S.C. 7104) which prohibits grant award recipients or a sub-recipient from (1) Engaging in severe forms of trafficking in persons during the period of time that the award is in effect (2) Procuring a commercial sex act during the period of time that the award is in effect or (3) Using forced labor in the performance of the award or subawards under the award.

SIGNATURE OF AUTHORIZED CERTIFYING OFFICIAL 	TITLE Monroe County Executive
APPLICANT ORGANIZATION Monroe County	DATE SUBMITTED 06/17/2022

SF-424D (Rev. 7-97) Back



**CERTIFICATIONS**

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

**Affirmatively Further Fair Housing** --The jurisdiction will affirmatively further fair housing.

**Uniform Relocation Act and Anti-displacement and Relocation Plan** – It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, (42 U.S.C. 4601-4655) and implementing regulations at 49 CFR Part 24. It has in effect and is following a residential anti-displacement and relocation assistance plan required under 24 CFR Part 42 in connection with any activity assisted with funding under the Community Development Block Grant or HOME programs.

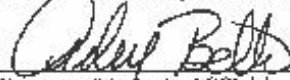
**Anti-Lobbying** –To the best of the jurisdiction's knowledge and belief:

1. No Federal appropriated funds have been paid or will be paid, by or on behalf of it, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement;
2. If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, it will complete and submit Standard Form-112, "Disclosure Form to Report Lobbying," in accordance with its instructions; and
3. It will require that the language of paragraph 1 and 2 of this anti-lobbying certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

**Authority of Jurisdiction** –The consolidated plan is authorized under State and local law (as applicable) and the jurisdiction possesses the legal authority to carry out the programs for which it is seeking funding, in accordance with applicable HUD regulations.

**Consistency with plan** --The housing activities to be undertaken with Community Development Block Grant, HOME, Emergency Solutions Grant, and Housing Opportunities for Persons With AIDS funds are consistent with the strategic plan in the jurisdiction's consolidated plan.

**Section 3** – It will comply with section 3 of the Housing and Urban Development Act of 1968 (12 U.S.C. 1701a) and implementing regulations at 24 CFR Part 75.



Signature of Authorized Official

06/17/22

Date

Monroe County Executive  
Title





### Specific Community Development Block Grant Certifications

The Entitlement Community certifies that:

**Citizen Participation** -- It is in full compliance and following a detailed citizen participation plan that satisfies the requirements of 24 CFR 91.105.

**Community Development Plan** -- Its consolidated plan identifies community development and housing needs and specifies both short-term and long-term community development objectives that have been developed in accordance with the primary objective of the CDBG program (i.e., the development of viable urban communities, by providing decent housing and expanding economic opportunities, primarily for persons of low and moderate income) and requirements of 24 CFR Parts 91 and 570.

**Following a Plan** -- It is following a current consolidated plan that has been approved by HUD.

**Use of Funds** -- It has complied with the following criteria:

**1. Maximum Feasible Priority.** With respect to activities expected to be assisted with CDBG funds, it has developed its Action Plan so as to give maximum feasible priority to activities which benefit low- and moderate-income families or aid in the prevention or elimination of slums or blight. The Action Plan may also include CDBG-assisted activities which the grantee certifies are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community, and other financial resources are not available (see Optional CDBG Certification).

**2. Overall Benefit.** The aggregate use of CDBG funds, including Section 108 guaranteed loans, during program year(s) 2022 [a period specified by the grantee of one, two, or three specific consecutive program years], shall principally benefit persons of low and moderate income in a manner that ensures that at least 70 percent of the amount is expended for activities that benefit such persons during the designated period.

**3. Special Assessments.** It will not attempt to recover any capital costs of public improvements assisted with CDBG funds, including Section 108 loan guaranteed funds, by assessing any amount against properties owned and occupied by persons of low and moderate income, including any fee charged or assessment made as a condition of obtaining access to such public improvements.

However, if CDBG funds are used to pay the proportion of a fee or assessment that relates to the capital costs of public improvements (assisted in part with CDBG funds) financed from other revenue sources, an assessment or charge may be made against the property with respect to the public improvements financed by a source other than CDBG funds.

In addition, in the case of properties owned and occupied by moderate-income (not low-income) families, an assessment or charge may be made against the property for public improvements financed by a source other than CDBG funds if the jurisdiction certifies that it lacks CDBG funds to cover the assessment.

**Excessive Force** -- It has adopted and is enforcing:


1. A policy prohibiting the use of excessive force by law enforcement agencies within its jurisdiction against any individuals engaged in non-violent civil rights demonstrations; and

2. A policy of enforcing applicable State and local laws against physically blocking entrance to or exit from a facility or location which is the subject of such non-violent civil rights demonstrations within its jurisdiction.

**Compliance with Anti-discrimination laws** – The grant will be conducted and administered in conformity with title VI of the Civil Rights Act of 1964 (42 U.S.C. 2000d) and the Fair Housing Act (42 U.S.C. 3601-3619) and implementing regulations.

**Lead-Based Paint** -- Its activities concerning lead-based paint will comply with the requirements of 24 CFR Part 35, Subparts A, B, J, K and R.

**Compliance with Laws** – It will comply with applicable laws.

  
\_\_\_\_\_  
Signature of Authorized Official

06/17/22  
Date

Monroe County Executive  
Title



**OPTIONAL Community Development Block Grant Certification**

Submit the following certification only when one or more of the activities in the action plan are designed to meet other community development needs having particular urgency as specified in 24 CFR 570.208(e):

The grantee hereby certifies that the Annual Plan includes one or more specifically identified CDBG-assisted activities which are designed to meet other community development needs having particular urgency because existing conditions pose a serious and immediate threat to the health or welfare of the community and other financial resources are not available to meet such needs.

N/A  
Signature of Authorized Official

\_\_\_\_\_  
Date

\_\_\_\_\_  
Title

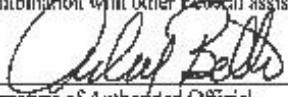
**Specific HOME Certifications**

The HOME participating jurisdiction certifies that:

**Tenant Based Rental Assistance** -- If it plans to provide tenant-based rental assistance, the tenant-based rental assistance is an essential element of its consolidated plan.

**Eligible Activities and Costs** -- It is using and will use HOME funds for eligible activities and costs, as described in 24 CFR §§92.205 through 92.209 and that it is not using and will not use HOME funds for prohibited activities, as described in §92.214.

**Subsidy layering** -- Before committing any funds to a project, it will evaluate the project in accordance with the guidelines that it adopts for this purpose and will not invest any more HOME funds in combination with other Federal assistance than is necessary to provide affordable housing;

  
\_\_\_\_\_  
Signature of Authorized Official

06/17/22  
\_\_\_\_\_  
Date

Monroe County Executive  
\_\_\_\_\_  
Title



## **Emergency Solutions Grants Certifications**

The Emergency Solutions Grants Program recipient certifies that:

**Major rehabilitation/conversion/renovation** – If an emergency shelter's rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation.

If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion.

In all other cases where ESG funds are used for renovation, the recipient will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

**Essential Services and Operating Costs** – In the case of assistance involving shelter operations or essential services related to street outreach or emergency shelter, the recipient will provide services or shelter to homeless individuals and families for the period during which the ESG assistance is provided, without regard to a particular site or structure, so long the recipient serves the same type of persons (e.g., families with children, unaccompanied youth, disabled individuals, or victims of domestic violence) or persons in the same geographic area.

**Renovation** – Any renovation carried out with ESG assistance shall be sufficient to ensure that the building involved is safe and sanitary.

**Supportive Services** – The recipient will assist homeless individuals in obtaining permanent housing, appropriate supportive services (including medical and mental health treatment, victim services, counseling, supervision, and other services essential for achieving independent living), and other Federal, State, local, and private assistance available for these individuals.

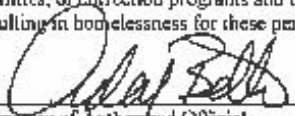
**Matching Funds** – The recipient will obtain matching amounts required under 24 CFR 576.201.

**Confidentiality** – The recipient has established and is implementing procedures to ensure the confidentiality of records pertaining to any individual provided family violence prevention or treatment services under any project assisted under the ESG program, including protection against the release of the address or location of any family violence shelter project, except with the written authorization of the person responsible for the operation of that shelter.

**Homeless Persons Involvement** – To the maximum extent practicable, the recipient will involve, through employment, volunteer services, or otherwise, homeless individuals and families in constructing, renovating, maintaining, and operating facilities assisted under the ESG program, in providing services assisted under the ESG program, and in providing services for occupants of facilities assisted under the program.

**Consolidated Plan** – All activities the recipient undertakes with assistance under ESG are consistent with its consolidated plan.

**Discharge Policy** – The recipient will establish and implement, to the maximum extent practicable and where appropriate, policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

  
\_\_\_\_\_  
Signature of Authorized Official

06/17/22  
\_\_\_\_\_  
Date

Monroe County Executive  
\_\_\_\_\_  
Title



**Housing Opportunities for Persons With AIDS Certifications**

The HOPWA grantee certifies that:

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

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

1. For a period of not less than 10 years in the case of assistance involving new construction, substantial rehabilitation, or acquisition of a facility,
2. For a period of not less than 3 years in the case of assistance involving non-substantial rehabilitation or repair of a building or structure.

\_\_\_\_\_  
 N/A  
 Signature of Authorized Official

\_\_\_\_\_  
 Date

\_\_\_\_\_  
 Title

**APPENDIX TO CERTIFICATIONS**

**INSTRUCTIONS CONCERNING LOBBYING CERTIFICATION:**

**Lobbying Certification**

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.