

CITY OF PITTSBURGH

PENNSYLVANIA

Department of City Planning
200 Ross Street
Pittsburgh, PA 15219

Luke Ravenstahl,
Honorable Mayor



SUBSTANTIAL
AMENDMENT OF THE
FY 2011 ANNUAL
ACTION PLAN

For Submission to HUD

May 15, 2012

BUILT ON EXPERIENCE
URBAN
DESIGN
VENTURES



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A. INTRODUCTION

The City of Pittsburgh's FY 2011 Annual Action Plan was originally submitted to the U.S. Department of Housing and Urban Development (HUD) on Tuesday, February 15, 2011. The City now is amending its FY 2011 Annual Action Plan to allow the City to receive the second allocation of the new Emergency Solutions Grant (ESG) Program funds. All other items in the FY 2011 Annual Action Plan remain in effect and are supplemented by this document.

The City of Pittsburgh is the recipient of an additional Federal entitlement grant under the Emergency Solution Grants Program (ESG), which replace the Emergency Shelter Grant Program. The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, consolidates three of the previous homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act, into a single grant program. In addition, the HEARTH Act codifies into law the Continuum of Care planning process, which will assist homeless persons by providing greater coordination in responding to their needs. This new grant program is the Emergency Solution Grant, which primarily focused on assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. Previously, the Emergency Shelter Grant focused on the needs of homeless people living in emergency or transitional shelters.

The ESG funds must be allocated for projects that are eligible under the following new six (6) ESG Components:

- **Street Outreach** – funding for unsheltered homeless persons which includes:
 - Engagement
 - Case Management
 - Emergency Health and Mental Health Services
 - Transportation
 - Services for Special Populations
- **Emergency Shelter** – funding is divided into two (2) sub-categories: Essential Services and Shelter for the sheltered homeless persons.
 - Essential Services include:
 - case management
 - child care, education, employment, and life skills services



- legal services
- health, mental health, and substance abuse services
- transportation
- services for special population.
- Shelter includes:
 - Renovation, including major rehabilitation or conversion
 - operational costs, including maintenance, utilities, furniture, food, etc.
- **Homeless Prevention** – funding includes the following items to prevent and stabilize an individual or family from becoming homeless:
 - Housing Relocation and Stabilization Services
 - Short- and Medium-Term Rental Assistance
- **Rapid Re-housing** – funding includes the following items to assist persons who are homeless:
 - Housing Relocation and Stabilization Services
 - Short- and Medium-Term Rental Assistance
- **Homeless Management Information System (HMIS)** – funding includes payment of the cost of establishing, hosting, customizing, and upgrading the HMIS.
- **Administration** – funding is allowable of up to 7.5 percent for the payment of administrative costs relating to the planning and execution of the ESG activities.

During FY 2011, the U.S. Department of Housing and Urban Development (HUD) announced the allocation of \$250 million in Emergency Shelter/Solutions Grants Program Funding. The FY 2011 funds were divided into two allocations. The first allocation of \$160 million was awarded under the Emergency Shelter Program regulation. The City of Pittsburgh received \$730,816 and awarded these funds through the FY 2011 Annual Action Plan process. The second allocation of \$90 million was released by HUD in January of 2012. City of Pittsburgh expects to receive \$411,084 for a total of \$1,141,900. To receive the second allocation of funds, the City must prepare and obtain HUD approval of a substantial amendment to its FY 2011 Annual Action Plan. The substantial amendment is due to HUD by May 15, 2012. HUD is encouraging communities to focus as much of their funding as possible on rapidly re-housing persons who are homeless, in order to reduce the number of persons who are living in shelters



and on the street, which will assist in ending homelessness in the City of Pittsburgh.

The City of Pittsburgh is part of the Pittsburgh/McKeesport/Penn Hills/ Allegheny County Continuum of Care. This is a regional initiative staffed by the Allegheny County Department of Human Services with the City staff serving on an ad hoc committee with the County.

B. SUMMARY OF CONSULTATION PROCESS

1. ALLOCATION OF ESG FUNDS

The City of Pittsburgh will provide funding for the following four (4) categories under the second allocation of ESG funds.

- Homeless Prevention
- Rapid Re-housing
- Homeless Management Information System (HMIS)
- Administration

The City of Pittsburgh and Allegheny County are committed to working with the Continuum of Care to determine the final budget allocation of ESG program funds each year, developing the performance and evaluation standards for activities, and promoting policies and procedures related to the administration and operation of HMIS. The past experience of the HPRP program will serve as a baseline for this partnership as the ESG program is being developed. Representatives of the City and County serve on the Continuum of Care Board and attend their meetings regularly. In addition, the City and County are on the HEARTH subcommittee of the Continuum of Care, and are Board Members of the Homeless Advisory Board which oversees the strategy of the Continuum of Care. The Continuum of Care is consulted for each community's Annual Action Plans. Over the past year, the City, County, and Continuum of Care members have met and discussed the new Emergency Solutions Grant Program.

2. PERFORMANCE STANDARDS

Moving forward, the City of Pittsburgh will continue to consult with the Continuum of Care to determine broad funding priorities to assist homeless persons, by including the Continuum of Care in the decision making process for the development of the ESG program. The City of Pittsburgh will work with the Continuum of Care to develop performance standards for projects and activities assisted by ESG funds, including



reviewing the standards that the Continuum of Care has established for their subgrantees.

3. FUNDING, POLICIES, AND PROCEDURES

Established Continuum of Care standards that are applicable and easily transferrable to ESG projects and activities will be used in the effort to apply a standard set of criteria for the use of ESG funds. The City of Pittsburgh will also work with the Continuum of Care, through their representation on the Homeless Advisory Board, by evaluating the outcomes of projects and activities assisted by ESG funds. Lastly, they will work with the Allegheny County Department of Human Services to develop funding, policies, and procedures for the administration and operation of the HMIS.

C. SUMMARY OF CITIZEN PARTICIPATION PROCESS

1. CITIZEN PARTICIPATION AND CONSULTATION PROCESS

There are many components that make-up the substantial amendment to the Annual Action Plan. These include: citizen participation and the development of the substantial amendment to the annual action plan.

The City of Pittsburgh has an approved Citizen Participation Plan, as required by HUD. Copies of the Citizens Participation Plan are on file in the Department of City Planning. The City has abided by its Citizen Participation Plan in the preparation and development of this substantial amendment to the FY 2011 Annual Action Plan.

On Wednesday, April 11, 2012 the City Public Hearing Notices were published in the "Pittsburgh Post Gazette" and "the New Pittsburgh Courier," newspapers of general circulation in the area. The "Draft Plan" was put on public display for 30 days. The Public Hearing was scheduled for Thursday, May 3, 2012 at 6:00 P.M. in the First Floor Conference Room, 200 Ross Street, Pittsburgh, PA 15219. Citizens were given the opportunity to comment on the draft version of the substantial amendment of the FY 2011 Annual Action Plan.

The following schedule was used in the preparation of the substantial amendment to the FY 2011 Annual Action Plan:



Meetings & Public Hearings	Date
Published Public Hearing Notice	April 11, 2012 (Pittsburgh Post Gazette and New Pittsburgh Courier)
Begin 30-Day Public Comment Period	April 12, 2012
Substantial Amendment Public Hearing	May 3, 2012
End of 30-Day Public Comment Period	May 12, 2012
Submission of Substantial Amendment of the FY 2011 Annual Plan to HUD	May 15, 2012

The “Substantial Amendment of the FY 2011 Annual Action Plan” was on display for a 30 day period beginning Thursday, April 12, 2012. The availability for review of the “draft plan” was advertised in the local newspapers and the plan was on display at the City of Pittsburgh website <http://www.city.pittsburgh.pa.us/>, as well as at each of the offices listed below:

- **Department of City Planning**
200 Ross Street, 2nd Floor
Pittsburgh, PA 15219
- **Urban Redevelopment Authority**
200 Ross Street, 10th Floor
Pittsburgh, PA 15219

2. SUMMARY OF CITIZEN COMMENTS OR VIEWS

The City of Pittsburgh followed its Citizen Participation Plan to gather documentation that was used for the development of the substantial amendment of the FY 2011 Annual Action Plan. The following attachments are included in “Part N. Citizen Participation Documentation”, of the document.

City of Pittsburgh	Date
Published Public Hearing Notice	April 11, 2012 (Pittsburgh Post Gazette and New Pittsburgh Courier)
Sign-In Sheets and Summary Minutes of Public Hearing	May 3, 2012



D. MATCH REQUIREMENTS

ESG has a dollar for dollar match requirement from Agency/Organizations receiving ESG funds. At a minimum, a 100% match is required from non-ESG State or Federal sources. Funds that are eligible to be used as match are:

	Contributions Type
Cash Contributions	Other Federal, State, or City funds.
	Private donations.
Non-cash Contributions	The value of fair rental value of any donated material or building.
	The value of any lease on a building.
	Any salary paid to staff to carry out the program.
	The value of time and services contributed by volunteers to carry out the program.

Matching funds will be provided after the award of the grant to the agency/organization. Agency/Organization will not use previous ESG funds match for subsequent grant awards.

The City will provide its own match for administrative funds allocated to the City based on other funds used for staff salaries to administer the ESG grant.

Agency/Organization matching sources will be provided in the final document after funding awards are approved by the City.



E. PROPOSED ACTIVITIES AND OVERALL BUDGET

1. PROPOSED ACTIVITIES

a.) Corresponding Priority Needs from Recipient's Annual Action Plan

The City of Pittsburgh proposed to address the following strategies and specific objectives from its Five Year Strategic Initiatives with its second ESG allocation:

Housing Strategy – HS		
	Objective	Priority
HS-9	Provide housing counseling and housing support services to income eligible residents.	High
Homeless Strategy – HA		
	Objective	Priority
HA-1	Promote housing opportunities for the homeless and/or the at-risk population who might become homeless.	Medium
HA-2	Promote supportive services for the homeless.	Medium
HA-3	Promote the development of permanent housing for the homeless.	Medium
HA-4	Promote anti-eviction programs to help prevent homelessness.	Medium
Anti-Poverty Strategy – AP		
	Objective	Priority
AP-1	Promote workforce development programs.	Medium
AP-2	Promote support services.	High
AP-3	Create new job opportunities for the unemployed and the underemployed.	Medium
AP-4	Provide assistance for food and shelter programs.	High
Administration & Management – AM		
	Objective	Priority
AM-1	Provide overall program administration and oversight of the program.	High
AM-2	Promote special planning and management activities.	Medium



b.) Description of the Activity, Including the Number and types of Persons to be Served

ESG eligible activities will be focused on Homeless Prevention, Rapid Re-Housing, HMIS, and ESG administration. The City of Pittsburgh intends to use the second ESG allocation of funds for prevention and stabilization of individuals or families from becoming homeless through housing relocation and stabilization services and short- and medium-term rental assistance; Homeless Management Information System (HMIS); and ESG administration.

c.) Corresponding Standard Objective and Outcome Categories

The City of Pittsburgh proposes the following outcome measures:

Project Name	Objective Category	Outcome Category
Emergency Solutions Grant Administration	N/A	N/A
Homeless Prevention and Rapid Re-Housing	Decent Housing	Availability/Accessibility
Homeless Management Information System (HMIS)	N/A	N/A

d.) Start Date and Completion Date

The start date is anticipated to be July 1, 2012 upon execution of grant agreement between HUD and the City of Pittsburgh and will end 24 months from the date of the executed grant agreement.

e.) ESG and Other Funding Amounts

The second allocation of the ESG funds will be used for:

- ESG Administration (max. 7.5%)
- Homeless Prevention and Rapid Re-Housing
- Homeless Management Information System (HMIS)



f.) Performance Indicators

The City of Pittsburgh’s performance indicators will be the number of persons or families assisted each year with ESG funds.

g.) Projected Accomplishments, in accordance with each Indicator, to be made within One Year

The City of Pittsburgh proposed the following accomplishments with the ESG second allocation of funds:

Project Name	ESG Accomplishments
Emergency Solutions Grant Administration	1 Organization
Homeless Prevention/Rapid Re-Housing	
Homeless Management Information System (HMIS)	1 Organization
Total:	

h.) Projected Accomplishments, in accordance with each Performance Indicator, to be made over the period for which the grant will be used for that activity

To be determined by approved activities.

2. FUNDING PRIORITIES

To be determined by which activities are selected for funding.

3. DETAIL BUDGET

The City of Pittsburgh proposes to fund the following ESG activities with the second ESG allocation:

Project Name	ESG Funds
Emergency Solutions Grant Administration	
Homeless Prevention/Rapid Re-Housing	



Homeless Management Information System (HMIS)	
Total ESG Activities:	\$411,084

F. WRITTEN STANDARDS FOR PROVISION OF ESG ASSISTANCE

The City of Pittsburgh is working on its written standards for providing ESG assistance which will include the following:

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant.
- Standards for targeting and providing essential services related to street outreach.
- Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter.
- Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention, and rapid re-housing assistance providers; and mainstream service and housing providers.
- Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance.
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance.
- Standards for determining how long a particular program participant will be provided with rental assistance and whether/how the amount of assistance will be adjusted over time.
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the



homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receives assistance; or the maximum number of times the program participation may receive assistance.

G. PROCESS FOR MAKING SUB-AWARDS

The consortium of the City of Pittsburgh, Allegheny County, and the Continuum of Care will serve as the ad hoc committee to allocate funding from the ESG program that is awarded to both the City and the County. This committee is comprised of members from the following governmental agencies:

- City of Pittsburgh Department of City Planning
- Allegheny County Department of Economic Development
- Allegheny County Department of Human Services
- Pittsburgh/McKeesport/Penn Hills/Allegheny County Continuum of Care

The availability of funds was announced through advertising in the local newspaper, and notifying potential applicants from an existing list of shelters and programs. Once proposals are received, they are catalogued by agency, dollar request, and types of activities proposed. The selection committee reviews the proposals to determine funding awards and to decide if the City or County will fund the respective projects. The current criteria for prioritizing funding are as follows:

- Homeless prevention activities
- Servicing underserved areas
- Rapid re-housing activities
- Homeless Management Information System (HMIS)

Each application is evaluated on the basis of need, demonstrated ability to provide rental assistance, financial accountability and existing/potential additional funding sources.

The City submits its list of proposed projects for approval to HUD as part of the overall Consolidated Plan application process. Once that approval is received, agencies are notified of their awards, a general orientation session is held with these groups, if needed, and the contract process is initiated by the City.



H. HOMELESS PARTICIPATION

The City of Pittsburgh meets the homeless participation requirement found in 24 CFR 576.405(a) A former homeless person is active on the Homeless Advisory Board and also serves on the Continuum of Care's HEARTH sub-committee. Several organizations representing the homeless were contacted for input during the planning process and the public meeting was advertized and homeless persons were informed of the meeting at the time of their housing and social services were provided.

I. PERFORMANCE STANDARDS

Based on past experience and after consultation with the Continuum of Care the following evaluation standards for ESG activities will be utilized:

- the organization's prior performance
- quality of services provided
- ability to draw down funds in a timely manner
- number of people served
- ability to leverage other funds

A committee which consists of representatives from Pittsburgh City Planning, the Continuum of Care, Allegheny County Department of Human Services, and Allegheny County Economic Development reviews and selects ESG activities. The composition and procedures of this committee will be reviewed and modified as necessary as the ESG program guidelines are finalized.

J. CENTRALIZED OR COORDINATED ASSESSMENT SYSTEM

Currently, the City and County have not established a centralized coordination system, but are working to develop the system.

K. MONITORING

The City of Pittsburgh's Department of City Planning has the primary responsibility for monitoring the City's Consolidated Annual Action Plan. The Department of City Planning will maintain records on the progress toward meeting the goals and statutory and regulatory compliance of each activity. The Department of City Planning will be responsible for the ongoing monitoring of sub-recipients.



The Department of City Planning has a “Monitoring Process” that is directed towards the following:

- Program Performance
- Financial Performance
- Regulatory Compliance

It is the City’s responsibility for ensuring that Federal funds are used in accordance with all program requirements, determining the adequacy of performance under sub-recipient agreements; and taking appropriate action when performance problems arise. It is also the City’s responsibility to manage the day to day operation of grant and sub-recipient activities. Monitoring is performed for each program, function, and activity.

The City of Pittsburgh’s Planning Department has developed a “monitoring checklist” that it utilizes when programs and activities are reviewed. This checklist, approved by the U.S. Department of Housing and Urban Development, was developed in accordance with Sub-part J of 24 CFR, Part 85 “Uniform Administrative Requirement for Grants and Cooperative Agreements of State and Local Governments” and the HUD Community Planning and Development Monitoring Handbook (HUD 6509.2)

The Department of City Planning staff conducts monitoring of Community Development Block Grant (CDBG) funds, HOME Investment Partnership (HOME) funds, Emergency Solutions Grant (ESG) funds, Housing Opportunities for Persons with AIDS (HOPWA) funds, and other federal programs. Project and program managers are assigned various activities and sub-recipients to monitor, including non-profit (social service) agencies, the Urban Redevelopment Authority of the City of Pittsburgh (rehabilitation, economic development and housing) and the Housing Authority of the City of Pittsburgh (public housing).

For projects, other than CDBG funded activities, a similar reporting format is used to monitor the Consolidated Annual Action Plan progress for HOME, ESG, and HOPWA activities.

The monitoring process is not a “one-time” event. The process is an on-going system of planning, implementation, communication and follow-up.

In the planning stage, ESG sub-recipients (non-profit agencies) are required to submit “proposals for funding.” These proposals are reviewed by the Department of City Planning staff the Continuum of Care Ad Hoc Committee for eligibility, and recommendations are then forwarded to the City’s administration and City Council for final funding approval. After a sub-recipient is approved for funding, the Department of City Planning staff conducts “orientation” meetings (either individually or a group meeting) to provide agencies information on their regulatory, financial and performance responsibilities. In addition, the monitoring



process of the Department of City Planning is outlined for the groups who are then guided into the “implementation” phase of the project. A scope of services and budget are finalized and the contract with each agency is executed.

During the time when the project or program is underway, the Department of City Planning staff may conduct an “on-site” monitoring visit where technical assistance is provided, files are reviewed and “corrective actions” are taken to resolve any potential deficiencies or problems.

A written communiqué follows the site visit to ensure that the sub-recipient adheres to recommendations previously discussed that will help the group to avoid potential programmatic/financial difficulties.

A follow-up site visit may occur with groups that were advised to take remedial or corrective actions to ensure that the actions were, in fact, taken and to prevent future recurrence of similar deficiencies.

The following procedures are included in the financial monitoring process: letters of transmittal from the sub-recipient accompany each “Requisition for Reimbursement” with supportive expenditure documentation and a project activity progress report.

Internal monitoring review of each Requisition for Reimbursement by the project manager for compliance with Circular A-122 “Cost Principles for Non-Profit Organizations: on-site financial monitoring of non-profit groups and the Urban Redevelopment Authority, if needed.

The City requests copies of independent audits, or use of A-133 auditing procedures, for all sub-recipients with Federal contracts over \$500,000.

The City of Pittsburgh provides citizens with reasonable notice of, and the opportunity to comment on its Consolidated Annual Action Plan, its performance under previously funded CDBG, HOME, ESG, and HOPWA Program Years, and substantial amendments to the Five Year Consolidated Plan and Annual Action Plans. The City of Pittsburgh will respond within 15 days in writing to any written complaints or inquiries from citizens in regard to the CDBG, HOME, ESG, and HOPWA Programs, its housing strategy, or it’s CAPER. This is enumerated in its Citizen Participation Plan.

The City monitors its performance with meeting its goals and objectives with its Five Year Consolidated Plan. It reviews its goals on an annual basis in the preparation of its CAPER and makes adjustments to its goals as needed.

In the expenditure of CDBG, HOME, and ESG funds for housing construction or project improvements, the City’s inspectors make periodic on-site inspections to insure compliance with the local housing codes. The City also requires submittal



of architectural drawings, site plans, and work specifications for this work. These are reviewed prior to issuance of building permits and the distribution of CDBG or HOME or ESG funds.

L. CERTIFICATIONS

Attached is the Emergency Solutions Grant Program Certifications.

M. SF 424 FORM

Attached is the Standard Form, SF-424, as required by HUD, in support of the City of Pittsburgh's Emergency Solutions Grant Program Substantial Amendment for FY 2011.

N. CITIZEN PARTICIPATION

Attached are the following items for the City of Pittsburgh's Substantial Amendment:

- Notice of Public Hearing – April 11, 2012
- Public Hearing Sign-In Sheet – May 3, 2012
- Summary of Minutes from the Public Hearing – May 3, 2012

O. TABLE 3 – FY 2011 DETAILED BUDGET TABLE

Attached is Table 3 – FY 2011 Detailed Budget Table for the Emergency Solutions Grant Program.