

STATE OF NEVADA

ANNUAL ACTION PLAN 2018-2019



HOUSING AND COMMUNITY DEVELOPMENT PROGRAMS



PREPARED BY THE GOVERNOR'S OFFICE OF ECONOMIC DEVELOPMENT

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WITH THE STATE OF NEVADA HOUSING DIVISION AND

**Nevada
Housing and Community
Development Programs**

2018 ANNUAL ACTION PLAN

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I. EXECUTIVE SUMMARY

A. INTRODUCTION

The 2018 Annual Action Plan (AAP) is the fourth annual action plan of the State of Nevada's 2015-2019 Consolidated Plan, a five-year plan addressing the State's housing and community development needs. This annual action plan is the fifth submitted using the IDIS e-Con Planning Suite and reflects the e-Con Planning Suite formatting.

The purpose of each annual action plan is to provide a summary of what the State proposes to do in the upcoming year to further the priorities and objectives of the Consolidated Plan. The plan is reviewed by the public; citizen comments are summarized in each annual action plan.

An annual plan also explains the State's method of distribution for the following programs:

- Community Development Block Grant (CDBG)
- Home Investment Partnership Program (HOME)
- Emergency Solutions Grant Program (ESG)
- Housing Opportunities for People with AIDS (HOPWA)
- National Housing Trust Funds (HTF)

Activities funded from these programs must meet the priorities identified in the Consolidated Plan. Programs are administered by the Governor's Office of Economic Development (GOED): Rural Community & Economic Development Division, Department of Business & Industry: Nevada Housing Division (NHD), and the Department of Health & Human Services (DHHS): Division of Public & Behavioral Health.

Additionally, the annual plan reports on specific items required by the U. S. Department of Housing and Urban Development (HUD) including, but not limited to, lead-based paint actions and removal of barriers to affordable housing.

B. CITIZEN PARTICIPATION SUMMARY

Information gathering for the 2018 Annual Action Plan is rooted in the 2015-2019 Consolidated Planning process and approved plan. For the 2018 program year, CDBG staff members held 2018 Application Workshops May 22nd and June 6th & 7th, 27th, 28th, and 29th in Carson City, Caliente, Pahrump and Goldfield respectively. Applicants unable to attend the formal training sessions had the option of one-on-one training at the GOED office or his/her city/county.

From July 1, 2017 through the end of the year and until the January 16, 2018 application due date, applicants held public meetings in city and county jurisdictions to determine which projects were of greatest importance to their communities. Pre-applications were due October 17, 2017 and reviewed by CDBG staff members to determine if each project met a National Objective and eligible activity, as well as the focus of the GOED/CDBG Program. Fourteen projects were deemed eligible; 23 were not. Notices via email were sent to applicants notifying them regarding the eligibility or non-eligibility of

their project(s). Two pre-applications appealed the eligibility decision and were submitted to the Appeal Process: the decisions stood.

The eligible applications were reviewed and initially scored on-line by the CDBG Advisory Committee. The committee met May 30th and 31st to determine funding for the 2018 program year. City and county applicants presented projects to AC members, who asked questions to clarify any information not clear in the applications. Carson City has a separate but equal review process. All funding recommendations are formally approved by the Governor prior to issuance of grant awards. The program year start date is July 1, 2018.

The 2018 HUD allocation for the four HUD formula programs was received On May 1st. The CDBG award, which includes Carson City was \$3,283,051. The 2018 allocation was \$3,283,051. State Planning and Administration for 2018 is \$165,277.02 (2% of allocation + \$100,000); Technical Assistance is \$32,831 (1% of allocation). Funds available for projects from the 2018 allocation total \$3,084,559. An additional amount of \$440,043 was recaptured and available to allocate for the 2018 grant cycle.

The 2018 Annual Action Plan includes all CDBG projects recommended for funding. The Plan was presented in Public Hearings held in Yerington, Carson City, and Las Vegas on June 6th, June 20th, June 22nd respectively. Meetings were publicly noticed: the 30-day period was from May 21st through June 22nd. Public Notices were published May 18th and 19th.

As part of all planning processes, numerous outside agencies and individuals are contacted throughout the year by staff members of the four HUD programs to discuss regional planning efforts. These organizations and individuals are encouraged to provide statistics, data, and other information to aid in preparing the Annual Action Plan and related studies. The Citizen Participation Plan is included in **Appendix A**.

C. 2018 ANNUAL ACTION PLAN SUMMARY

The State of Nevada is required by the U.S. Department of Housing and Urban Development (HUD) to prepare an Action Plan for Housing and Community Development annually. Timely completion of the Plan in a HUD-acceptable format helps ensure continued funding of housing and community development activities throughout the state. In 2014, the State of Nevada began preparation for its Five-Year Consolidated Plan, covering the program years 2015 – 2019. The Consolidated Plan contains information about demographic, economic, and housing market trends in the state; analysis of statewide affordable housing needs; findings from the citizen participation process; and an analysis of the needs of special populations.

The following plan represents the fourth year of that five-year plan: the 2018 One-Year Action Plan for allocating the state's federal block grant funds to address housing and community development needs. To make the document more informative for citizens and more useful for policy makers and those engaged in the production of affordable housing, the document describes actions and activities to be undertaken with resources beyond the federal grant programs and by organizations other than those administering the federal grant programs. It is intended to represent a comprehensive Action

Plan for affordable housing and community development activities statewide. The goals and activities identified here can by no means be accomplished with federal grant programs alone. Where possible, the plan specifies those actions or activities that are expected to be undertaken with other resources as well as the related outcomes expected to be achieved; however, since many of these other resources are more flexible than the federal grant programs, it is difficult to estimate how these resources may be utilized.

D. EVALUATION OF PAST PERFORMANCE

The Governor's Office of Economic Development and the State of Nevada Housing Division's evaluation of its past performance on CDBG, HOME, ESG and HOPWA has been completed in a thorough Consolidated Annual Performance and Evaluation Report (CAPER), most recently published for 2016. The 2017 CAPER is due September 30, 2018. This document states the objectives and outcomes identified in each Annual Action Plan and includes an evaluation of past performance through measurable goals and objectives compared to actual performance. The document can be found on the Governor's Office of Economic Development's website at:

<http://www.diversifynevada.com/programs-resources/cdbg/division-documents>

II. ANNUAL ACTION PLAN DEVELOPMENT PROCESS

A. LEAD AGENCY AND ADMINISTERING AGENCIES

The Governor's Office of Economic Development: Division of Rural Community & Economic Development Division is the lead agency for overseeing the development of the 2015-2019 Consolidated Plan and subsequent Annual Action Plans. Partnering agencies are: the Department of Business & Industry: Nevada Housing Division [responsible for HOME and ESG]; the Department of Health and Human Services: Division of Public and Behavioral Health [responsible for the HOPWA and Special Needs of Non-Homeless activities]. A non-state partnering organization is the non-profit Northern Nevada HOPES and a sub-recipient of HOPWA funding.

B. CONSULTATION AND COORDINATION

The State of Nevada's HUD-funded programs have established procedures for consultation with local governments, advisory groups, program stakeholders, Continuum of Care, community leaders and businesses, public institutions, faith based organizations, other state agencies and interested citizens are consulted during preliminary development of the Consolidated and Action Plans. All are consulted in the event amendments are necessary to the Consolidated or Annual Action Plan. Consultation may occur in a variety of methods: surveys and/or meetings, Public Notices, mail, and/or by publication in one or more newspapers of general circulation.

CDBG, ESG, HOME and HTF program staff actively engaged housing and homeless providers, community leaders, and other interested parties throughout rural Nevada by conducting or participating in forums, community coalitions and planning meetings to gather input on housing, homeless, and community needs in rural communities. Input from the northern Continuums of Care

was also obtained to ensure ESG funds passed through to the City of Reno funded activities that were locally supported.

The State has a strong working relationship with the Housing Authority in rural Nevada and provides State Low-income Housing Trust funds for tenant-based rental assistance for homeless households who were referred by Coordinated Entry lead agencies in rural Nevada. Funds were also used to provide security deposit to Housing Choice Voucher clients.

The State provides funding from either the federal ESG Program or the State Low-Income Housing Trust Fund Program to several county social services agencies and non-profits throughout Nevada. Activities funded include tenant-based rental assistance to eligible households, emergency rent and utility assistance for households at risk of homelessness, and funding for rapid re-housing programs. Agencies receiving these funds are required to work closely with public institutions including hospitals, jails, and mental health clinics, which allows clients access to housing and supportive services. Memorandums of Understanding have been implemented to ensure cooperation between agencies, and staff from hospitals, jails, mental health, and other providers. All participate in community coalition meetings also attended by Housing Division staff when possible.

The Housing Division has actively participated in the Rural Nevada Continuum of Care (RNCoC) for the past 13 years; the ESG Program Manager is a member of the RNCoC Governance Committee, as well as the Statewide CoC HMIS Governance Committee. Funding priorities and allocations for the ESG program are determined by a committee that includes members of the RNCoC and other board members. ESG program staff work in conjunction with the RNCoC to develop performance standards for Written Standards for projects and activities funded through the ESG and other CoC programs; they work with the RNCoC to monitor performance of CoC sub-recipients.

The State also engages the Reno Area Alliance for the Homeless (RAAH) to ensure that programs and services funded through the State ESG program, and passed through the City of Reno as a State Recipient, are in alignment with RAAH goals and objectives. This is accomplished throughout the year during monthly Leadership Council meetings. The State also works with RAAH and the City of Reno to develop performance standards and outcomes for programs funded through the State ESG program.

The Division allocates a portion of State ESG funds to the HMIS Lead Agency in southern Nevada to support costs of the HMIS database throughout Nevada. The State ESG Program Manager participates in statewide HMIS subcommittee meetings and is an active participant in the development of policies and procedures for the operation and administration of the statewide HMIS. The Division also engages members from the southern Nevada CoC during Statewide CoC meetings to gather information regarding the types of programs and services needed in the Clark County area.

Finally, the Nevada Housing Division supports the Rural Nevada Continuum of Care by providing funding for oversight of the CoC process. The benefit of this support is the approximately \$574,995 in homeless funding awarded by HUD to rural communities; the additional dollars are leveraged to provide supportive housing projects, all of which would not be awarded if the RNCoC didn't have that planning capacity support.

C. EFFORTS TO ENHANCE CITIZEN INVOLVEMENT

Public involvement for the Consolidated Plan began in October 2014 and extended over a period of several months. Two key steps were taken in the involvement process. One was the implementation of three focus group meetings involving experts in housing and community development issues for the state of Nevada, and the other was a set of public input meetings during which citizens were provided the opportunity to offer feedback and input regarding the Consolidated Plan.

Focus groups were held in early November of 2014 with the purpose of drawing upon the expert knowledge of stakeholders and their thoughts on barriers and constraints encountered in Nevada's housing and community development arena. These focus groups were designed around five key topic areas: affordable housing, economic development, and infrastructure. These meetings allowed key stakeholders and statewide leaders the opportunity to explore the depth of the respective housing and community development barriers and uncover creative solutions to emerging problems. These groups provided insight and an overview to guide subsequent years' action plans.

D. ACTIONS TO BE TAKEN TO ENHANCE THE INSTITUTIONAL STRUCTURE AND ITS COMMUNICATION

The State of Nevada is committed to continuing its participation and coordination with federal, state, county, local agencies, and the private and nonprofit sectors to effectively serve the needs of low-income individuals and families across Nevada. The Governor's Office of Economic Development, Department of Business and Industry, and the Department of Health and Human Services collaborate with various entities to continually improve coordination.

The Governor's Office of Economic Development, Department of Business and Industry, and the Department of Health & Human Services all have individual institutional structures. Within each Office or Department, there are divisions that administer HUD programs. The CDBG Program is in the Rural Community & Economic Development Division of the Governor's Office of Economic Development. The HOME, HTF, and ESG programs are in the Nevada Housing Division of the Department of Business & Industry. The HOPWA program is in the Division of Public and Behavioral Health in the Department of Health and Human Services. Each Division has its institutional structure, as well.

HUD funds pass through the State to local governments and other entities that are eligible to receive HUD program funding. These entities, when funded, are part of the institutional structure for each program. The scope of the institutional structure is from the state level to those at the community level where projects are created, implemented, and managed. Actions to be taken in or continuing in 2018 to enhance coordination and promote further development of that institutional structure include:

- Supporting the creation or strengthening of economic development across and between regions (CDBG);

- Supporting the Strengthening Fair Housing outreach and training for all grantees and sub-grantees (CDBG);
- Providing annual training and technical assistance to CDBG grantees;
- Supporting collaborations in CDBG non-entitlement areas;
- Quarterly meetings with other funders to maximize limited resources (CDBG, USDA, EPA, other collaborative funders);
- Continuing the implementation of ZoomGrants into other areas, such as reporting. ZoomGrants is an on-line grant application and grant management system, that streamlines the application process and reporting requirements for CDBG;
- Continuing to work with the staff of the Low-Income Housing Tax Credit program to ensure HOME funds are used to leverage this program;
- Continuing to work with the northern, southern and rural Continuums of Care and remaining actively involved in the CoC process.

III. ALLOCATING HOUSING AND COMMUNITY DEVELOPMENT RESOURCES

A. OVERVIEW OF AVAILABLE RESOURCES

With Nevada’s Governor’s Office of Economic Development as the lead agency overseeing development, numerous state and federal programs support the implementation of the state’s Consolidated Plan. Interagency cooperation and coordination of state, federal, and local agencies and organizations is critical to the success of many projects. The following summaries describe programs supporting the overall implementation of Nevada’s Consolidated Plan and each year’s annual action plan with respect to affordable housing, public facilities, economic development, and homelessness.

B. FEDERAL RESOURCES

HUD Formula Grants

The State of Nevada receives annual funding for five HUD formula grant programs:

- CDBG Program, administered by Nevada’s Governor’s Office of Economic Development: Rural Community & Economic Development Division;
- HOME Program, administered by the Department of Business & Industry: Nevada Housing Division;
- HOPWA, administered by the Department of Health and Human Services: Division of Public and Behavioral Health;
- ESG Program, administered by the Department of Business & Industry: Nevada Housing Division; and
- HTF Program, administrated by the Department of Business & Industry: Nevada Housing Division.

Community Development Block Grant (CDBG) Program

The Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community and economic development needs. Beginning in 1974, the federal CDBG program is one of the longest continuously run programs at HUD. The CDBG program provides annual grants on a formula basis to 1,209 general units of local government and States.

The Rural Community & Economic Development Division of the Governor's Office of Economic Development administers the CDBG Program. The allocation from HUD for the State CDBG Program in Nevada for 2018 is \$3,283,051 and reflects the inclusion of funding for Carson City. Deducting \$165,661 (2% + \$100,000) for Administration and \$32,831 (1%) for Technical Assistance, \$3,084,559 is available to allocate for projects. During the March Advisory Committee meeting, advisory committee members heard project presentations by the applicants and recommended funding for projects. Funds de-obligated of 440,043 were available for re-allocation. As noted in the Method of Distribution (MoD), additional funds also can be allocated during the program year. For instance, in the 2016 Program Year, a large de-obligation was returned to the state: a second allocation round was conducted. The process was a streamlined version of the regular application process.

While Carson City reverted to the state CDBG program for 2017, its allocation process remains the same as in its entitlement status. However, for the 2018 process, applicants used the state's ZoomGrants system and the Carson City Advisory Committee scored applications in ZoomGrants.

Refer to **APPENDIX B** for CDBG projects funded to date.

CDBG Program

2018 CDBG Funding	Amount
Total FY 2018 Allocation	\$3,283,051.00
Program Income	0
Prior Year Resources	\$440,043.00
Total	\$3,723,094.00

HOME Investment Partnerships (HOME) Program

The HOME Investment Partnerships Program (HOME) provides formula grants to States and localities that communities use - often in partnership with local nonprofit groups - to fund a wide range of activities including building, buying, and/or rehabilitating affordable housing for rent or homeownership or providing direct rental assistance to low-income people. HOME is the largest Federal block grant to state and local governments designed exclusively to create affordable housing for low-income households. HOME funds are awarded annually as formula grants to participating jurisdictions (PJs). The program's flexibility allows states and local governments to use HOME funds for grants, direct loans, loan guarantees or other forms of credit enhancements, or rental assistance

or security deposits.

Table I.2	
2018 HOME Funding	Amount
2017 Allocation	\$3,008,138
Program Income	\$500,000
Prior Year Resources	0
Total	\$3,508,138

The HOME Program, administered by the Nevada Housing Division, will receive \$3,008,138 in HUD funds for the Program Year beginning July 1, 2018. Additionally, the State HOME Program expects that grantees will generate approximately \$500,000 of program income and/or recaptured funds from previously awarded grants.

Housing for People with AIDS (HOPWA) Program

Housing Opportunities for Persons with AIDS (HOPWA), administered by the Nevada Department of Health and Human Services, will receive an annual allocation of \$327,032. The Housing Opportunities for Persons with AIDS (HOPWA) program, managed by HUD's Office of HIV/AIDS Housing, was established to provide housing assistance and related supportive services for low-income persons living with HIV/AIDS and their families. HOPWA formula grants are made using a statutorily-mandated formula to allocate approximately 97 percent of HOPWA funds to eligible cities on behalf of their metropolitan areas and to eligible States. Refer to the following table:

Table I.3	
2018 HOPWA Funding	Amount
2018 Allocation	\$327,032
Program Income	0
Prior Year Resources	0
Total	\$327,032

Emergency Solutions Grant (ESG) Program

Table I.4	
2018 ESG Funding	Amount
2018 Allocation	\$437,849
Program Income	0
Prior Year Resources	\$39,810
Total	\$457,849

The Emergency Solutions Grant Program, formerly named the Emergency Shelter Grant, provides formula funding to address homelessness to eligible jurisdictions. The Nevada Housing Division will receive \$437,849 for the ESG Program in the 2018 Program Year.

National Housing Trust Fund (HTF) Program

Table I.5	
2018 HTF Funding	Amount
2018 Allocation	\$3,000,000
Program Income	0
Prior Year Resources	0
Total	\$3,000,000

The National Housing Trust Funds provide formula funding to increase and preserve the supply of rental housing for extremely low- and very low-income families, including homeless families, and to increase homeownership for extremely low and very low-income families. The Housing Division is separating the HTF application from the Low-Income Tax Credit Application process to allow for greater flexibility to provide housing to Extremely Low-Income households.

HUD Competitive Grants

Competitive grant programs allow eligible applicants to request funding directly from HUD by submitting an application. Each year, HUD's Super NOFA (Super Notice of Funding Availability) process makes competitive funds available for the selection of proposals submitted by government agencies and nonprofits. These proposals address special projects of national significance and long-term projects in areas that are not eligible for formula allocations.

Continuum of Care (CoC)

The three Continuums of Care in Nevada received a total of \$15,864,846 in 2017 homeless funding. The Nevada Balance of State CoC (NV-502) received \$560,313 in Continuum of Care funding for a total of ten projects serving the Balance of State area. Table 1.6 shows the funded projects for FY 2017. The State expects similar funding for FY 2018.

Table 1.6
Continuum of Care (CoC) Awards
Balance of State

U.S. Department of Housing and Urban Development		
Project name	Program	Amount
High Desert Housing (vitality Center)	CoCR	\$84,164
HMIS Rural Housing 2017 (Clark County SS)	CoCR	\$78,341
Humboldt County Rapid Re-Housing Project	CoCR	\$30,579
Humboldt County Permanent Housing Project	CoCR	\$24,920
Rapid Re-Housing 2019 (Churchill County SS)	CoCR	\$74,070
CoC Planning Application FY 2017 CoC (DPBH)	CoCR	\$18,834
Shelter Plus Care I (Carson City HHS)	CoCR	\$15,358
Shelter Plus Care II (Carson City HHS)	CoCR	\$28,050
Supportive Services Only – Coordinated Entry (SSO-CE) (NRHA)	CoCR	\$39,629
Rural Shelter Plus Care	CoCR	\$209,112
TOTAL		\$560,313

OTHER FEDERAL RESOURCES

Low Income Housing Tax Credits (LIHTC)

The Tax Credit Program is a federally regulated state administered program designed to help eliminate the funding gap in the creation of low- and very low-income housing projects. Federal Tax Credits, awarded on a competitive basis, provide equity financing for affordable housing projects. The Housing Division develops an annual Tax Credit Allocation Plan pursuant to Section 42 of the Internal Revenue Code. LIHTC is used for acquisition, multifamily new construction, multifamily rental rehabilitation of housing.

C. STATE RESOURCES

Nevada Low-Income Housing Trust Fund

Nevada Low-Income Housing Trust funds can be used for the following purposes:

- new construction and rehabilitation of multi-family projects,
- down payment assistance,
- homeowner rehabilitation,
- tenant-based rental assistance, and
- homeless prevention assistance.

It is estimated that \$7,000,000 will be available for FY 2018.

D. LEVERAGING AND MATCHING OF FEDERAL DOLLARS

Federal funds will continue to be leveraged with nonfederal resources to achieve the objectives of this plan. Matching requirements will be achieved through a variety of methods. Grant recipients are encouraged to utilize funds from the private sector, state and local programs, and other sources to assist in meeting HUD matching requirements and to increase the amount of funds available to

provide affordable housing, expand economic opportunities, improve infrastructure, and provide community facilities.

Community Development Block Grant

While HUD does not require matching funds for funded projects, historically, the Nevada non-entitlement CDBG program's grantees contribute significant leverage. For the 2018 program year, grantees anticipate leveraging an estimated \$5,174,724.

HOME Investment Partnerships Program

Nevada Housing Division will leverage equity investment generated from the Low-Income Housing Tax Credit program and funds from Rural Development with regards to home ownership projects. Match requirements for the HOME program are fulfilled using property tax exemptions and Nevada Low-Income Housing Trust Funds.

National Housing Trust Funds

The division will seek to leverage HOME funds, VASH vouchers and other funding sources while collaborating with the Southern Nevada Regional Housing Authority and other agencies. Although the state is separating the HTF application from the Low-Income Housing Tax Credit program in 2018 it is anticipated that HTF may leverage and generate additional development by providing gap financing.

Emergency Solutions Grant Program

The ESG Program requires the State to identify or provide match for the entire allocation amount, less the first \$100,000.00 of the annual allocation. The match requirement for 2018 will be \$320,810.

ESG sub-recipients have provided sources of match funds in their annual application. Sources identified include:

- Cash match, such as the State's Low-Income Housing Trust Fund-Tenant Based Rental Assistance Program used to provide rental assistance for homeless and at-risk of homelessness clients,
- The State's Welfare Set-Aside Program for emergency rent and utility assistance,
- County funds that pay for salaries of agency staff providing ESG programs and services, Community Services Block Grant funds,
- Non-federal grants from United Way and Newmont Gold;
- In-kind services such as volunteer hours and donations; and
- ESG Program Manager salary for time to manage grant (paid out of a state allocation)

Agencies are required to identify match on every draw reimbursement request, which is logged in a

tracked by the ESG Program Manager to ensure match obligation is met. Match records are reviewed during monitoring visits.

Housing Opportunities for Persons With AIDS:

No matching funds required. The Ryan White Part B program does complement HOPWA activities with Housing Services to assist Ryan White clients with short-term assistance to enable an individual or family to gain or maintain medical care.

E. GEOGRAPHIC DISTRIBUTION OF HUD RESOURCES

The geographic distinction determining allocation of HOME, ESG, HOPWA, and CDBG program funds is between the state's major urban centers and the smaller cities, counties, and rural areas of Nevada. Generally, major urban centers are funded for one program or more directly by HUD. The smaller cities, counties and rural areas are funded through the State of Nevada.

Major urban centers benefit from having a concentration of resources. Smaller cities, counties, and rural areas are challenged by having fewer resources and an expansive area to cover. While geographically, Nevada is the seventh largest state in the nation "only 13 percent of the land is not administered by the federal or state government. This 13 percent controlled by local governments or private property owners, makes Nevada the tenth smallest state in the Nation." (Nevada State Demographer, nvdemography.org, February 8, 2011.) Nevada has the highest percentage of Federal acreage in the nation at 82.9 percent. The next highest is Alaska at 68.5 percent. It is difficult to imagine just how sparsely populated the rural areas are and the challenges presented with serving the rural areas.

GEOGRAPHIC DISTRIBUTION

Following is a summary of each program's geographic distribution system.

Community Development Block Grant Program

The State of Nevada does not allocate funds geographically. Project funding is based on needs identified at the local level and through a competitive grant process. However, for the 2017 Program Year, Carson City, an entitlement, reverted to the state program. As the city has the right to return to entitlement status, its initial allocation, under the state/non-entitlement formula, was calculated by HUD and will be allocated as that percent to total each year.

The rationale for the priorities for allocation of resources is based on a competitive grant process. The State does not designate specific target areas. In past years, CDBG set-asides have addressed specific issues that may be more regional in nature and not necessarily addressed by units of local government (UGLG). During the 2015 allocation process, the CDBG Advisory Committee recommended that all set-asides be eliminated and each application be submitted as a competitive application. That recommendation was adopted for the 2016 grant cycle at the annual Forum, held September 16, 2015 in Virginia City. Additional changes in the Method of Distribution were: (1) an updated application form adopted in preparation for the change-over to an online grant application

and management system (ZoomGrants) and (2) an updated rating form for use by the CDBG Advisory Committee. No changes were made for the 2018 Program Year for the state. Refer to the full Method of Distribution for each program later in this plan and or in the appendices.

The non-entitlement area is composed of 27 eligible entities: 15 rural counties and 12 small cities. Of the 27 eligible entities, four are LMI-designated Counties or Cities (Caliente, Lovelock, West Wendover, and Yerington). However, they, too, participate in the competitive grant process. Each UGLG is entitled to apply for CDBG grant assistance on an annual basis. For the 2018 program year, each UGLG could submit two applications for the city or county plus two sponsored applications. Recommendation for funding is contingent on having no more than five (5) open grants with prior set-aside grants grandfathered in at no penalty to a city or county.

Funding of projects is based on priorities set by the City or County through a Citizen Participation Process and through a Housing and Community Needs Assessment or other planning process. Applicants are required to submit a Housing and Community Needs Assessment at the time they submit a grant application. City and county needs are taken into consideration and incorporated into State plans that guide project selection and implementation processes through each year. Eligible projects are selected through a rigorous CDBG Advisory Committee review process. Committee recommendations are ratified by the Governor's Office of Economic Development and the Governor.

Emergency Solutions Grant Program

ESG funds will be provided to northern and rural communities and counties that submitted a Request for Funds. For funding cycle 2018 there were eleven (11) applicant for ESG funding. These applicants include: Advocates to End Domestic Violence, Carson City Friends in Service Helping, Carson City Health and Human Services, Churchill County Social Services, Elko Friends in Service Helping, Humboldt County Human Services, Lyon County Human Services, Nye County Health and Human Services, The City of Reno, White Pine County Social Services, and Winnemucca Domestic Violence Services. The Nevada Housing Division will receive approval for 2018 ESG allocations from the Rural Nevada Continuum of Care in June 2018.

The Nevada housing Division anticipates allocating no more than 60% of the overall allocation to emergency shelters and dispersing the remaining funds between rapid rehousing projects, outreach initiatives and HMIS technical assistance.

Of the six counties allocated State ESG funding in 2017, three have an average poverty rate of 18.62 percent. Washoe County has three Targeted Area Census Tracts (an area that has been, or may be, designated as an area of chronic economic distress), and a poverty rate of 12.5%. Lyon County has a poverty rate of 11.9%, and Carson City has a poverty rate of 13.0%. The remaining areas have an average poverty rate of 12.17%, with one area containing two Targeted Area Census Tracts (Elko). Of the counties requesting ESG funds, four (Washoe, Elko, Humboldt, and Carson counties) reflect Hispanic or Latino/Latina populations between 24 to 27 percent. The remaining rural counties average 15% Hispanic or Latino/Latina populations.

Funds received from HUD are for non-entitlement areas; however, the City of Reno has been a

recipient of ESG funds since the beginning of the program. Once they became a direct recipient of ESG funds from HUD, State funds were still allocated as the grant received from HUD was significantly less than the amount received annually from the State. The State's grant is divided into northern and rural allocations based on a formula using population and poverty data. In the past The City of Reno received between 73% and 40% of the State's allocation and funding decisions are decided by the City, with input from the Reno Area Alliance for the Homeless. Reno was not funded in 2017 due to 2016 funds not being spent in a timely manner. They have since reallocated funds from Rapid-Rehousing to Shelter and have expended their allocation as of March 2018 and have applied for ESG funds in the current 2018 funding cycle.

Rural areas requesting allocations will be awarded funds based upon poverty data; unmet need; annual point-in-time data; and recommendations received from the Rural Nevada Continuum of Care.

HOME Investment Partnerships Program

The State HOME entitlement funds are allocated statewide. Each Participating Jurisdiction will choose where to allocate their state funds. The Division is anticipating the development of two new properties in non-entitlement areas of the state. One is a proposal to acquire and rehabilitate two USDA multi-family developments and the other is a new construction. In order to achieve this, the applicant will have to receive an award of Low Income Housing Tax credits. Program Income generated from State funded HOME projects may be used to support eligible activities state-wide and will not be distributed according to the geographic formula for entitlement funds.

As the allocating agency for the State of Nevada, the Housing Division must take into consideration the needs of all Nevadans. Therefore, that is the rationale for allocating funds to all Participating Jurisdictions in the State. Eligible jurisdictions include all non-entitlements plus Carson City.

In the event that a Participating Jurisdiction is unable to commit HOME funds to a local project within the time frame set forth within the agreement with the State; the State will work with the jurisdiction to locate and support a project within their jurisdiction. Absent a viable project within the respective the state may reclaim those uncommitted funds for commitment and expenditure elsewhere in the state.

HOPWA

The majority of clients utilizing HOPWA funding reside within the Reno-Sparks area. HOPES currently serves approximately 60-70 individuals with HIV/AIDS who live in the rural areas outside of the Reno/Sparks. Because of the distance, providing effective case management and housing assistance can be difficult. HOPES recognizes that geographic location can be a barrier when administering services.

F. OBSTACLES IN MEETING UNDERSERVED NEEDS

Agencies continue to have challenges keeping homeless and at-risk of homelessness clients engaged in their journeys to long-term independence and stability. Funding for case managers is strained due

to efforts to address homeless and chronic homelessness issues in rural areas. Finding staff with the skills to work with the population is challenging in smaller communities.

Although improved, case managers working with homeless clients continue to have difficulties with engaging clients in the process of becoming stabilized and self-sufficient. Program participants are challenged to find employment with a “living wage” that allows a household to meet its basic needs.

Finally, agencies have agreed to implement “Housing First” or “Low Barrier” programs. However, case managers feel pressure to meet State and CoC performance measures and are struggling to find enough resources, such as permanent housing subsidies, which will ensure the long-term success of program participants. Limited funding means clients need to be exited quickly; yet the limited availability of permanent housing subsidies means clients are in jeopardy of exiting without sufficient resources to ensure long-term housing stability.

To help address these issues, the State will continue to partner with the local Continuum of Care to help with the training and development of case managers on how to engage their clients. This will continue to be a topic discussed during monthly Technical Meetings.

Social Services agencies that are also ESG recipients have developed workforce programs. The State is working closely with the Northern Nevada Development Authority, a coalition of community and business leaders that promotes education and marketing, to identify workforce and educational needs across northern Nevada. Workforce case managers will work with individuals to identify the barriers keeping them from stable employment. The case manager will also connect participants to educational opportunities to help develop work skills. In addition, participants will receive assistance with the creation of resumes and soft skill training, such as interviews, how to dress, and other employment etiquette.

These same ESG recipients are also Community Action Agencies that conduct monthly meetings to identify households facing poverty and homelessness. Members discuss the availability of resources and opportunities for indigent residents in an open forum format. Partnerships have been developed with emergency shelter providers, Salvation Army, JOIN, Job Connect, Voc-Rehab, Veterans Resource Centers, Aging and Disability Resource Centers, and local food banks.

The shortage of permanent housing subsidies is a more challenging issue to resolve, especially in rural Nevada. Fortunately, the Nevada Rural Housing Authority has members who participate in the Rural Continuum of Care and are very engaged in directing funds to homeless providers. They have agreed to prioritize the homeless to receive Housing Choice Vouchers (HCV) when referred to them by Coordinated Entry Lead Agencies and/or are on the HCV wait list. They will also receive additional State Low-Income Housing Trust Funds for tenant-based rental assistance programs for the homeless, although it is likely those resources will not be sufficient to cover all the housing needs of rural participants.

IV. HOUSING AND COMMUNITY DEVELOPMENT STRATEGIES

A. 2015-2019 HOUSING AND COMMUNITY DEVELOPMENT PLAN SUMMARY

The following list presents the overriding priorities of the Nevada Five-Year Consolidated Plan for Housing and Community Development, including selected performance criteria associated with each strategy and goal. Furthermore, there may be a need to direct such housing resources by use of project selection criteria, which may be updated annually, based upon year-to-year need and local circumstances.

HOUSING PRIORITIES:

Priority 1: Increase the availability of rental housing for low- income households

Priority 2: Increase, preserve and improve the long-term life of existing affordable rental and owner-occupied housing stock, as well as improving housing accessibility and safety

Priority 3: Expand homeownership opportunities for low-income homebuyers

HOMELESS PRIORITIES:

Priority 4: Continue support of existing sub-recipients operating emergency shelters and transitional housing for the homeless, including motel vouchers in communities lacking adequate shelter.

Priority 5: Create additional transitional and permanent supportive housing, including the rapid re-housing program.

Priority 6: Provide financial support to assist those at imminent risk of homelessness

Priority 7: Support effective data collection and entry activities for the homeless services provided when servicing client populations

SPECIAL NEEDS PRIORITIES:

Priority 8: Increase and preserve the supply of affordable housing available to the elderly and disabled.

Priority 9: Improve the access that special needs populations have to needed services

COMMUNITY DEVELOPMENT PRIORITIES:

Priority 10: Improve infrastructure by assisting with sidewalk/path, street, water and wastewater system upgrade and development projects.

Priority 11: Enhance access to quality facilities to serve the population throughout rural Nevada.

Priority 12: Provide infrastructure and other planning support for units of local government.

ECONOMIC DEVELOPMENT PRIORITIES:

Priority 13: Retain and expand existing businesses.

Priority 14: Support recruitment and attraction of new businesses to Nevada

Priority 15: Provide employment opportunities for low- and moderate-income people

Each of the priorities identified above, as well as the objectives consistent with each strategy are discussed in greater detail in following pages. Performance measurement criteria are presented at the end of each priority narrative. The following section also describes one-year (2016) funding allocations and goals.

HOUSING PRIORITIES:

The population throughout Nevada continues to increase, and this growth is occurring more quickly in certain areas of the state with dramatic economic change. The demand for quality affordable homeowner and rental housing will continue to rise along with population, but at different rates depending on the local community's economic, demographic and housing market conditions. As the State of Nevada strives to meet the needs of its residents, housing remains a top priority.

Priority 1: Increase the availability of rental housing for low- income households

The Housing Division will assist eligible nonprofit and for-profit housing builders with financial subsidies for the development of rental properties affordable to low-income households through the affordable housing development programs. The program will be implemented through the State Housing Trust Fund and available HOME funds. Funds are made available for the development of affordable permanent and transitional rental housing units through a competitive application process. Financed units must comply with long-term income restrictions and rent limits.

Outcome: Availability/accessibility

Objective: Provide decent affordable housing

2018 Funding: HOME: \$600,000

Five-Year Goal:

Rental Units Constructed: 45 housing units added

One-Year Goal:

Rental Units Constructed: 8 housing units added

Priority 2: Increase, preserve and improve the long-term life of existing affordable rental and owner-occupied housing stock, as well as improving housing accessibility and safety

The State's housing rehabilitation programs will provide resources for preserving the affordable housing stock. Housing rehabilitation and energy assistance is primarily focused at elderly households who make up the largest share of low- and moderate-income homeowners. Elderly households continue to be the largest group of owners facing a housing cost burden. Much of the housing stock in the consolidated plan area is older and needs repair in order to maintain it as part of the housing stock. Improvements will lower the cost of maintenance and energy, thereby improving affordability among owners, particularly elderly owners.

Outcome: Sustainability

Objective: Provide Decent Affordable Housing

2018 Funding: HOME: \$700,000

Five-Year Goal:

Rental Units Rehabilitated 27 Household Housing Units
Homeowner Housing Rehabilitated 20 Households Housing Units

One-Year Goal:

Rental Units Rehabilitate 11 Household Housing Units
Homeowner Housing Rehabilitate 7 Households Housing Units

Priority 3: Expand home ownership opportunities for low- to moderate-income homebuyers

The Housing Division will offer down payment assistance to low-income households purchasing homes in high-cost areas of the state. The program will provide low-interest, deferred loans to be used for down payment and closing costs. In addition to down payment assistance made available through the HOME program the Nevada Rural Housing Authority administers a non-federal down payment assistance programs that is available to homebuyers in the non-entitled areas of the state.

Outcome: Affordability

Objective: Provide Decent Affordable Housing

2018 Funding: HOME: \$200,000

Five-Year Goal:

Direct Financial Assistance to Homebuyers 66 Households Assisted

One-Year Goal:

Direct Financial Assistance to Homebuyers 10 Households Assisted

HOMELESS PRIORITIES

The State of Nevada is committed to helping to work towards the goals of reducing and ending homelessness throughout the State by prioritizing homelessness with funding and program initiatives.

Priority 4: Continue support of existing sub-recipients operating emergency shelters and transitional housing for the homeless, including motel vouchers in communities lacking adequate shelter.

Under the broad category of homeless services, the Housing Division will work with nonprofit partners and local government agencies to provide funding for many services needed by homeless persons, such as case management, health services, and outreach. Funding will also be provided to assist with shelter maintenance and operations.

Outcome: Sustainability

Objective: Create Suitable Living Environments

2018 Funding: ESG: No more than 60% of overall allocation
Nevada Housing Trust Fund: \$22,000

Five-Year Goal:

Homeless Person Overnight Shelter 3,000 Persons Assisted

One-Year Goal:

Homeless Persons Overnight Shelter: 500 Persons Assisted

Priority 5: Create additional transitional and permanent supportive housing, including the rapid re-housing program.

The Nevada Housing Division supports efforts to acquire additional housing structures for homeless transitional and permanent supportive housing in the non-entitled areas. The Division will work with local nonprofits and county social service agencies to fund potential projects.

Outcome: Availability/Accessibility

Objective: Provide Decent Affordable Housing

2018 Funding: ESG: TBD
Nevada Housing Trust Fund: \$120,000

Five-Year Goal:

Overnight/Emergency Shelter/ Transitional Housing 35 Beds added
Rapid Re-housing 250 households assisted

One-Year Goal:

Overnight/Emergency Shelter/ Transitional Housing 7 Beds added
Rapid Re-housing 50 households assisted

Priority 6: Provide financial support to assist those at imminent risk of homelessness

The Nevada Housing Division will provide financial support, including services and outreach for persons at imminent risk of becoming homeless.

Outcome: Affordability

Objective: Create Suitable Living Environments

2018 Funding: ESG: TBD
Nevada Housing Trust Fund-Welfare Set-Aside Program: \$1,050,000

Five-Year Goal:

Homeless Prevention 2,500 Persons Assisted

One-Year Goal:

Homeless Prevention 500 Persons Assisted

Priority 7: Support effective data collection and entry activities for the homeless services provided when servicing client populations.

As the State strives to reduce and ultimately end homelessness, accurate information and data collection is necessary to track progress and needs throughout the State. Effective data collection and entry activities for homeless activities are essential to making progress in the fight against homelessness. Therefore, the State will allocate ESG funds for this purpose.

Outcome: Sustainability

Objective: Create Suitable Living Environments

2018 Funding: ESG: TBD

Five-Year Goal:

Sub-recipients comply with HMIS Data Quality Standards. Average data quality 90 percent

SPECIAL NEEDS PRIORITIES

Throughout the state of Nevada, there remain several special needs groups that need housing and housing related services. The State strives to meet the needs of these populations through various services and housing programs.

Priority 8: Increase and preserve the supply of affordable housing available to the elderly and disabled

Through affordable housing development programs, a variety of resources will be available for this purpose. The State Housing Trust Fund will be available to fund a variety of affordable rental housing, including rental housing for special needs groups like the elderly and large families. A goal of this program is to provide a certain percentage of all units built as accessible to disabled persons. Any units produced with federal funds that are designed to be accessible to persons with disabilities must meet affirmative marketing requirements. Additionally, HOPWA funds will be available for persons with HIV/AIDS and their families. This year, a proposed rehabilitation project identified in Priority 2 includes preservation of 24 units of elderly USDA housing.

Outcome: Availability

Objective: Provide Decent Affordable Housing

2018 Funding: HOME: \$160,000

Five-Year Goal:

Rental Units Constructed 18 Household Housing Units

One-Year Goal:

Rental Units Constructed 3 Household Housing Units

Priority 9: Improve the access that special needs populations have to needed services, including persons with HIV/AIDS

The CDBG program will allow jurisdictions to apply for a limited amount of funding on an annual basis to support social service activities that benefit primarily low-income households. These activities can include, but are not limited to, domestic violence shelters, food banks, youth services, senior services, services for persons with disabilities and persons with HIV/AIDS, and transit services. Housing Division and the Division of Public and Behavioral Health will also work with local and state partners to

coordinate effective housing and support services.

Outcome: Availability/Accessibility

Objective: Create Suitable Living Environments

Five-Year Goals:

Public Service activities other than Low/Moderate Income Housing Benefit 200 Persons

One-Year Goals:

Public Service activities other than Low/Moderate Income Housing Benefit:

CDBG: 560/560 LMI Persons

HOPWA: 96 Persons Assisted

2018 Funding:

CDBG: \$68,000

HOPWA: \$327,032

COMMUNITY DEVELOPMENT PRIORITIES

Throughout the state of Nevada, there are various community development needs, including public facilities, infrastructure as well as the need for additional planning. This Plan prioritizes funds to meet those needs to serve the residents of the State.

Priority 10: Improve infrastructure by assisting with sidewalk/path, street, water and wastewater system upgrade and development projects.

The Rural Community & Economic Development Division will participate in funding activities that improve the existing infrastructure through updating street, water and wastewater systems and sidewalks/paths.

Outcome: Sustainability

Objective: Create Suitable Living Environment

Five-Year Goal:

Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit:

105,000 persons assisted

One-Year Goal:

Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit:

19,092/12,883 LMI-persons assisted

2018 Funding:

CDBG: \$3,697,794

Priority 11: Enhance access to quality facilities to serve the population throughout rural Nevada.

The Rural Community & Economic Development Division will participate in funding quality facilities that benefit the low- to moderate-income populations throughout rural Nevada.

Outcome: Availability/Accessibility

Objective: Create Suitable Living Environments

Five-Year Goal:

Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit
70,000 persons assisted with CDBG

One-Year Goal:

Public Facility or Infrastructure Activities for Low/Moderate Income Housing Benefit

Public Facility or Infrastructure Activities:
CDBG: 1,063/652 LMI persons assisted

2018 Funding:

CDBG: \$1,000,000

Priority 12: Provide infrastructure and other planning support for units of local government.

As part as the on-going effort to improve the quality of living environments for rural Nevada residents, the Rural Community & Economic Development Division will provide funding for infrastructure and other planning activities for local units of government. The amount of funds available to planning is limited by HUD regulations.

Outcome: Sustainability

Objective: Create Suitable Living Environments

Five-Year Goal:

Other: Planning Activities CDBG: 65,000 persons assisted

One-Year Goal:

Other: Planning Activities
CDBG: 40,756/21,808 LMI persons assisted

2018 Funding:
CDBG: \$204,000

ECONOMIC DEVELOPMENT PRIORITIES

The State has many opportunities to improve the quality of life for Low- to Moderate-Income residents throughout the State by providing for economic development.

Priority 13: Retain and expand existing businesses.

The Rural Community & Economic Development Division will participate in funding for a business assistance network and microenterprise business development system. Activities will include providing credit for the stabilization and expansion of business, providing technical assistance and business support services, and providing general support.

Outcome: Sustainability

Objective: Creating Economic Opportunities

2018 Funding:
CDBG: \$0.00

Five-Year Goal:

Businesses Assisted 100 Businesses Assisted

One-Year Goal:

Businesses Assisted 0 Businesses Assisted

Priority 14: Support recruitment and attraction of new businesses to Nevada

The Rural Community & Economic Development Division will participate in funding for a business assistance network and microenterprise business development system. Activities will include providing credit for the establishment of business, providing technical assistance and business support services, and providing general support.

Outcome: Availability/Accessibility

Objective: Creating Economic Opportunities

2018 Funding: CDBG \$-0-

Five-Year Goal:

Businesses Assisted 125 Businesses Assisted

One-Year Goal:

Businesses Assisted 0 Businesses Assisted

Priority 15: Provide employment opportunities for low- and moderate-income people

The Rural Community & Economic Development Division will participate in providing infrastructure or facilities to provide for business expansion or development to offer employment opportunities throughout the rural service area.

Outcome: Availability/Accessibility

Objective: Creating Economic Opportunities

2018 Funding: CDBG: \$0.00

Five-Year Goal:

Jobs created/retained 25 Jobs

One-Year Goal:

Jobs created/retained 0 LMI persons assisted

B. ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE

In the Fair Housing Act, it is a policy of the United States to prohibit any person from discriminating in the sale or rental of housing, the financing of housing, or the provision of brokerage services, including in any way making unavailable or denying a dwelling to any person, because of race, color, religion, sex, national origin, handicap, or familial status.

According to HUD, impediments to fair housing choice include actions or omissions in the state that constitute violations of the Fair Housing Act. Further, impediments mean actions or omissions that are counter-productive to fair housing choice or that have the effect of restricting housing opportunities based on protected classes.

B.1. FAIR HOUSING CERTIFICATION

In accordance with the applicable statutes and regulations governing the consolidated plan, the State of Nevada certifies that they will affirmatively further fair housing. This means that the State has conducted an AI within the state, will take appropriate actions to overcome the effects of any impediments identified through that analysis, and maintain records reflecting that analysis and actions in this regard. A summary of the most recent AI is noted below.

B.2. A SUMMARY OF THE 2015 ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE ANALYSIS OF IMPEDIMENTS TO FAIR HOUSING CHOICE - PURPOSE AND PROCESS

AI PURPOSE AND PROCESS

As a requirement of receiving funds under the Community Development Block Grant (CDBG), the HOME Investment Partnerships (HOME), and the Emergency Solutions Grant (ESG), entitlement jurisdictions must submit certification of affirmatively furthering fair housing to the U.S. Department of Housing and Urban Development (HUD). This certification has three elements:

1. Complete an Analysis of Impediments to Fair Housing Choice (AI),
2. Take actions to overcome the effects of any impediments identified, and
3. Maintain records reflecting the actions taken in response to the analysis.

In the *Fair Housing Planning Guide*, page 2-8, HUD provides a definition of impediments to fair housing choice as:

- Any actions, omissions, or decisions taken because of race, color, religion, sex, disability, familial status, or national origin which restrict housing choices or the availability of housing choices [and]
- Any action, omissions, or decisions which have [this] effect. OF0F2
- 2 U.S. Department of Housing and Urban Development, Office of Fair Housing and Equal Opportunity. *Fair Housing Planning Guide*. Vol. 1, p. 2-8.

http://www.hud.gov/offices/cpd/about/conplan/fairhousingexs/Module5_TopSevenAFFH.pdf

The list of protected classes included in the above definition is drawn from the federal Fair Housing Act, which was first enacted in 1968. However, state and local governments may enact fair housing laws that extend protection to other groups, and the AI is expected to address housing choice for these additional protected classes as well.

The AI process affirmatively furthers fair housing and involves a thorough examination of a variety of sources related to housing, the fair housing delivery system, and housing transactions, particularly for persons who are protected under fair housing law.

The development of an AI also includes public input and review via direct contact with stakeholders, public meetings to collect input from citizens and interested parties, distribution of draft reports for citizen review, and formal presentations of findings and impediments, along with actions to overcome the identified impediments.

IMPEDIMENTS TO FAIR HOUSING CHOICE AND SUGGESTED ACTIONS

Private Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Discrimination against disabled residents and families with children. This

impediment, which may serve to restrict the availability of housing for residents with disabilities and those with children, was identified through a review of complaints filed with HUD and the Silver State Fair Housing Council; through forum and outreach meeting discussions with Nevada stakeholders; the review of fair housing cases and studies; and the results of the Nevada Fair Housing Survey. “Disability” ranked as the most frequent basis for complaints filed with HUD by residents of non-entitlement areas of the state, accounting for more than half of all complaints lodged from 2004 through 2014. Complaints based on disability accounted for an even larger share of complaints filed with the Silver State Fair Housing Council, which also received more complaints overall than HUD during approximately the same period. Representatives of the Fair Housing Council who participated in forum and outreach committee discussions confirmed that disability was the most common basis for complaints that they receive, and much of the discussions at those meetings revolved around the challenges facing the community of residents with disabilities. The presence of those challenges in the state is to some degree borne out by the profile of the seven cases filed by the Department of Justice against Nevada housing providers over the last ten years; five of these were related to disability-based discrimination. Discrimination based on disability was also a recurrent theme in comments submitted by respondents to the Nevada Fair Housing Survey, which promoted the input and involvement of residents and stakeholders with disabilities and those with children.

“Failure to make reasonable accommodation” was the most common type of discriminatory practice alleged in complaints filed with HUD, and approximately a third of the reasonable accommodation requests that the Silver State Fair Housing Council sent to housing providers in the state’s non-entitlement areas were denied. However, discrimination against residents with disabilities can also consist of a refusal to rent to a person with disabilities, or denying that a housing unit is available. For example, one of the complaints filed by the Department of Justice in the state alleged that a landlord refused to rent to a woman with severe allergies, on the grounds that she might lose consciousness while the electric range was on.

Action 1.1: In partnership with the Silver State Fair Housing Council, conduct outreach and education with managers of new and existing rental housing complexes.

Measurable Objective 1.1: The number of outreach efforts conducted.

Action 1.2: Conduct a survey of local and county zoning regulations or unified development codes to determine whether they include a statement on reasonable accommodation or ADA building requirements.

Measurable Objective 1.2: The number and percentage of local and county ordinances that contain a statement on reasonable accommodation and ADA requirements.

Impediment 2: Racial and ethnic minority home loan applicants are denied more frequently than white or non-Hispanic applicants. This impediment was identified through review of home loan data gathered under the Home Mortgage Disclosure Act. These data reveal the existence of impediments that may restrict housing choices or the availability of housing choice by race and national origin, indicating that the denial rate for American Indian residents was nearly ten percentage points higher than the denial rate for white applicants and the denial rate for black residents was nearly twice as

high as that of white residents. Similarly, the denial rate for Hispanic applicants, of 28.6 percent, was over ten percentage points higher than the denial rate for non-Hispanic residents. It should be noted that HMDA data do not include information that is pertinent to the decision to approve or deny a loan, such as the credit score of applicants or the size of the prospective down payment. Nevertheless, these data do provide an index of the average applicant's experience during the loan application process, and indicate whether an applicant is more likely to be denied if he or she is black, Hispanic, or American Indian.

Action 2.1: Contact professionals in the home lending industry, the Division of Mortgage Lending, and other pertinent agencies and organizations to discuss the findings of the AI regarding home lending and gather recommendations on how to address differential rates of home loan denials.

Measureable Objective 2.1: Record of contact with local professionals, officials, and other experts, along with a list of recommendations.

Outreach activities:

2016

- 760 Women attended the Women's Money Conference in Las Vegas, Reno and Carson City.
- Spanish speaking conferences in Las Vegas and Reno had 163 in attendance.
- 54% of attendees left the Reno conference feeling empowered to increase their credit score. In 30 days 11% increased their credit score.

2017

- No conference
- The Women's Money® Program provides mentoring provide services for 450 individuals. The Women's Money® Program **One** is designed to help women have a place of support while they take action on their personal finances to create a strong foundation. Women's Money Two is primarily about investments.
- Advocates to End Domestic Violence provides PATH- Positive Action Toward Hope (PATH), which is a budgeting and life skills program-There were 41 participants
- Churchill County Budgeting Classes – 36 individuals attending Budgeting Classes (budgeting resources, managing money, building/repairing credit) – classes taught by Life Counseling Center.

2018

- Women's Money Conference Scheduled
 - Las Vegas, NV - April 16, 2018 Saturday
 - Reno, NV – May 14, 2018 Saturday

Action 2.1: Conduct outreach and education of prospective housing consumers on how to acquire

and keep good credit, in partnership with local civic organizations (i.e., churches, schools, etc.)

Measurable Objective 2.2: Records of existing and forthcoming outreach and education activities in local and county jurisdictions, including locations, number of participants, etc.

Impediment 3: Lack of understanding of fair housing laws and the role of the fair housing infrastructure. This impediment was identified through review of the Nevada Fair Housing Survey and in consultation with state and local officials and stakeholders during the outreach committee and fair housing forum meetings. Though a majority of respondents maintained that they were “somewhat” or “very” familiar with fair housing laws, a substantial minority noted that these laws are difficult to understand or follow. In addition, survey questions concerning specific areas, industries, policies, or practices relating to fair housing choice tended to receive high shares of “don’t know” responses. Participants in the public outreach committee meetings also cited a lack of knowledge concerning fair housing among members of the public, feeling this to represent a significant challenge to efforts to affirmatively further fair housing, and maintained that efforts to increase public knowledge of fair housing policy should be a priority in the current AI process.

Action 3.1: Partner with the Silver State Fair Housing Council to enhance outreach and education throughout the state, targeting property managers and other housing providers.

Measurable Objective 3.1: Number of outreach and education sessions offered and number of attendees.

Action 3.2: Establish a requirement that local and county grantees take actions to publicize fair housing rights, responsibilities, and remedies.

Measurable Objective 3.2: The number of documented activities and actions completed and tracked through monitoring site visits.

Public Sector Impediments, Suggested Actions, and Measurable Objectives

Impediment 1: Zoning laws and development standards have restricted some types of housing, notably group homes and other types of supportive housing. This impediment was identified through results of the fair housing survey and discussions with participants in outreach committee meetings. Though the share of respondents who were aware of barriers to fair housing choice in given public sector practices was generally low, a greater share of respondents claimed to be aware of policies and practices in zoning laws that represented barriers to fair housing choice. Several participants in the outreach committee meetings shared that perception, and noted that at present it is unclear the extent to which local jurisdictions and counties have updated their zoning and land-use planning codes in accordance with State Bill 233, passed in 2013, which removes certain restrictions on the placement of group homes and supportive housing.

Furthermore, it is not known whether those local zoning codes still include language that (1) restrict the number of non-related persons living together, or prohibit cohabitation by non-related persons entirely; (2) require special use permits or public hearings on proposed supportive housing; (3) bar

accessory apartments from single family zoning districts; (4) fail to include a statement on reasonable accommodation; and (5) bar manufactured housing from single family zoning districts, even if such units are converted to real property and permanently placed on a lot.

Action 1.1: Conduct a statewide survey to determine if local zoning and land-use ordinances are in compliance with recent changes to state law, and to identify any provisions still in effect that may serve to disproportionately restrict housing choice for protected class individuals.

Measurable Objective 1.1.1: Record the number of local and county ordinances reviewed throughout the state, identified by jurisdiction.

Measurable Objective 1.1.2: Record the number and percentage of local and county ordinances that maintain the spacing requirements prohibited by S.B. 233 (2013) or similar requirements, identified by jurisdiction.

Measurable Objective 1.1.3: Record the number and percentage of local and county zoning ordinances that maintain provisions or language that has the effect of excluding units more frequently inhabited by protected class populations.

Action 1.2: Notify jurisdictions that are not in compliance with the requirements adopted in S.B. 233.

Measurable Objective 1.2: Record of correspondence with and notification of local jurisdictions.

Action 1.3: Compile a compliance report based on the review.

Measurable Objective 1.3: Draft the compliance report.

Impediment 2: Lack of a substantially equivalent state agency enforcing the Nevada Fair Housing Law. This impediment was identified through a review of the state's fair housing infrastructure and discussions at the public outreach committee meetings. The Nevada Equal Rights Commission is identified in the state's fair housing law as the agency responsible for enforcing the provisions of the law, which, among other things, provide for the intake, investigation, and resolution of complaints. However, despite efforts in the legislature in 2005 and 2009, which had the support of the Commission, legislation designed to make the state law substantially equivalent to the federal Fair Housing Act were not passed. As a result, the Commission is unable to benefit from federal funding provided through the Fair Housing Assistance Program.

Participants in the outreach committee meetings considered the Commission's role in fair housing enforcement to be limited. Thus, housing complaints from residents in the state are typically forwarded to HUD, unless those complaints pertain to discrimination on bases that are not covered by the federal Fair Housing Law. For example, those who have suffered discrimination in the private housing market because of gender identity or sexual orientation have limited recourse under federal law, and must resolve their complaints at the state level.

Action 2.1: Contact the Equal Rights Commission to share the findings of the State AI, discuss past efforts to introduce legislation that would make the state law "substantially equivalent" to the FHA, and assess the feasibility of reintroducing legislation in the 2015 or 2017 Regular Session of the

Legislature.

Measurable Objective 2.1: Record of contact with the Equal Rights Commission on the subject of “substantial equivalency.”

Nevada Equal Rights Commission (NERC) has created bill drafts in 2015 and 2017; Both drafts remain unapproved. Nevada Equal Rights Commission intends to draft a bill for 2019, again requesting substantial equivalency in statute for the Nevada Equal Rights Commission. Nevada Equal Rights Commission would like to collaborate with NHD and draft the bill to name Nevada Equal Rights Commission as the enforcement agency. Substantial equivalency would also create funding opportunities to pay for Nevada Equal Rights Commission to address Fair Housing complaints throughout Nevada.

Action 2.2: Discuss with the Commission ways in which it might collaborate with the Housing Division and Silver State Fair Housing Council on any of the other actions identified in this AI.

Nevada Equal Rights Commission NERC would like to collaborate with Nevada Housing Division to provide outreach and/or training to individuals and businesses.

Measureable Objective 2.2: Record of contact with the Equal Rights Commission on the subject of collaboration on the actions identified in this AI.

Action 2.3: Request a copy of the Commission most recent report submitted to the governor in accordance with NRS 233.080, and review fair housing activities; in particular, the outcome of fair housing complaints submitted to the Commission.

In 2017 there were 21 housing charges received and seven housing charges resolved. Most of the 2017 charges are pending – either pending to be assigned into investigation or currently being investigated.

A housing charge is a discrimination complaint accepted by the Nevada Equal Rights Commission. To meet the requirements to become a charge a complaint must allege discrimination in housing based on one or more protected categories (race, religion, color, national origin, disability, ancestry, familial status, sex, gender identity or expression, or sexual orientation); it has to be timely and against a covered entity. The charge is served to the Respondent and the Nevada Equal Rights Commission attempts to settle the complaint through voluntary mediation. If the case does not settle through voluntary mediation then the case will go into investigation.

Measureable Objective 2.3: Record of contact with the Commission and the results of the review of fair housing activities.

Impediment 3: Lack of understanding of fair housing laws and the responsibility to affirmatively further fair housing. This impediment was identified through review of the Nevada Fair Housing Survey and in consultation with state and local officials and stakeholders during the outreach

committee and fair housing forum meetings. As noted in Public Sector Impediment 3, a substantial minority of survey respondents noted that fair housing laws are difficult to understand or follow. Furthermore, survey questions concerning specific areas, industries, policies, or practices relating to fair housing choice tended to receive high shares of “don’t know” responses. Participants in the public outreach committee meetings also cited a lack of knowledge concerning fair housing among members of the public, believing this to represent a significant challenge to efforts to affirmatively further fair housing, and maintained that efforts to increase public knowledge of fair housing policy should be a priority in the current AI process. Accordingly, the survey, which was itself designed to promote the input and involvement of stakeholders who were more likely to be impacted by fair housing issues, revealed a need for further outreach and education on the issues of fair housing.

Action 3.1: Enhance outreach and education to units of local government, as well as housing consumers, as it relates to affirmatively furthering fair housing and the duty to affirmatively further fair housing.

Measurable Objective 3.1: Number of outreach and education efforts taken.

2018 Actions & Measurable Objectives

During the 2018 program year, staff members of the HUD programs will:

- Working with Silver State Housing will develop a method to target managers of new and existing rental housing complexes to conduct outreach and education with said groups (Private Sector Impediments: Action 1.2).
- Develop a survey that will be sent to cities and counties to determine the number and percentage that have ordinances regarding reasonable accommodation or ADA building requirements (Private Sector Impediments: Action 1.2). This activity was scheduled for 2016 but demands on staff time delayed implementation. Partners are meeting August 22, 2017 to assess accomplishments and establish deadlines for activities.
- Develop an RFP with the objective of conducting a statewide survey to determine if local zoning and land-use ordinances are in compliance with recent changes to state law and to identify provision that may be in effect that disproportionately restrict housing choice for protected class individuals (Public Sector Impediments: Action 1.2).

C. BARRIERS TO AFFORDABLE HOUSING

Barriers to affordable housing are created by market, infrastructure, environmental, and governmental factors. Barriers may result in housing that is not affordable to low-income households or an inadequate supply of housing. In the eight-county State HOME area, traditional barriers to affordable housing are not readily apparent. Some of the counties and cities in the area directly address the need for affordable housing types in the local planning documents. In most cases, communities have taken few active steps to encourage affordable housing development. Development regulations and development standards are minimal in most communities; therefore, associated costs are generally not viewed as an impediment to affordable housing. The housing inventory in the area is largely dominated by mobile homes. Multi-family structures are very limited

due to overall housing affordability and higher ownership rates and less demand for multi-family rental housing. The limited employment and population growth in the past did not generate significant demands for rental housing either. Available infrastructure needed to support high-density residential development is lacking.

Some of potential barriers or constraints to the development of affordable housing that were identified are as follows:

URBAN AREAS

- Availability of financing
- Limited funding
- High land cost/availability of land
- Labor shortages
- Impact/development fees
- Zoning
- Design guidelines
- Lack of infrastructure

NON-URBAN AREAS

- Limited funding
- Wage gap
- Lack of employment opportunities
- Lack of infrastructure
- Availability of financing
- Lack of local capacity
- High land cost/availability of land

Nevada is committed to removing or reducing barriers to affordable housing whenever possible. The Nevada Housing Division will identify and disseminate innovative solutions to housing affordability barriers used successfully by other states, including the promotion of alternative building materials and methods, land banking, and planning and zoning reservations for affordable development.

The 2014 Housing and Community Development Survey included questions about barriers and constraints to affordable housing. Responses included “Not in my back yard” (NIMBY mentality, cost of land or lot, and cost of materials. Additional comments included lack of affordable housing, development policies, cost of labor and lack of other infrastructure.

The 2014 Housing and Community Development Survey included questions about barriers and constraints to affordable housing. Responses included Not In My Back Yard (NIMBY) mentality, cost of land or lot, and cost of materials. Additional comments included lack of affordable housing development policies, cost of labor and lack of other infrastructure.

The Nevada’s Governor’s Office and the State of Nevada will take the following actions to remove barriers to affordable housing:

- In the non-entitled areas of the State the Housing Division does not feel that there are 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, fee and charges, growth limitations and policies affecting the return on residential investments. With the funding available for rural areas, we see approximately one new multi-family project tax credit project a year, and when funding allows, a small project of approximately eight units can be funded with HOME and Trust Funds.

D. LEAD-BASED PAINT HAZARDS

Housing units built before 1940 are most likely to contain lead-based paint. Units built between 1940 and 1978 have a lesser risk (lead was removed from household paint after 1978), although many older units may have few if any problems depending on construction methods, renovation and other factors.

The following table, Table IV.2, presents data regarding the number of owner-occupied households at risk of lead-based paint hazards, broken down by presence of children age 6 and under and income. Owner-occupied households showed 3,415 units with young children built prior to 1980. There were higher numbers of households in these older units at higher income levels. Table IV.3 shows renter-occupied households at risk of lead-based paint exposure by income and presence of children under 6 years of age. There were 3,950 households with young children present in housing units built prior to 1980 in 2011. The number of households in these units was more equally spread among income levels than that of owner-occupied units. In addition, 36.2 percent of renters with young children were in units built prior to 1980, compared to 22.9 percent of owners with young children.

NEVADA LEAD REMOVAL EFFORTS

HOME – The Housing Division ensures that the non-profit in charge of the homeowner rehabilitation program has the necessary XRF training and equipment to test for lead based paint. All units funded that were built prior to 1978 are tested. The Housing Division will continue to ensure that all housing projects funded with CDBG and HOME funds will comply with the Federal guidelines regarding notification and abatement requirements.

CDBG - The Governor’s Office of Economic Development: Rural Community & Economic Development/CDBG ensures that homes built prior to 1978 that are rehabilitated with CDBG funds are tested for lead-based paint hazard by the Rural Nevada Development Corporation (RNDC) staff. Any chipped, peeling or flaking paint is tested with an XREF analyzer. If lead-based paint is present, the contractor is tasked with setting up proper containment areas during construction and during proper clean up. Any hazardous lead paint areas must be encapsulated. In some instances, the components, such as door and window frames, are replaced. Other times the peeling paint is scraped and peeled away and a special paint is used to seal the area. One-hundred percent of the homes rehabilitated with CDBG funds are LMI households.

Nevada Division of Public and Behavioral Health - The Bureau of Child, Family, and Community Wellness Division of the Division of Public and Behavioral Health (DPBH) oversees the Childhood Lead Poisoning Prevention Program throughout the State of Nevada. In southern Nevada the State

partnered with the University of Nevada – Las Vegas to implement the “Healthy Home Partnership”, which was a CDC-funded grant program to provide a holistic approach to addressing public health issues in the home. It was the plan of the State to implement this program in northern and rural Nevada. However, the grant received from the CDC has been cancelled. Therefore, the communities will be working locally to continue with this initiative.

Outreach within northern and rural communities to ensure that homes are safe, clean, and healthy for the people who live there is the mission of the DPBH for the upcoming year. The Division plans to assist the capacity of local communities in their efforts to reduce or eliminate housing-related health hazards over time. To accomplish this, the Division plans to provide trainings to communities, including agencies in the health and social services fields, and property management companies, which will educate staff on ways to help protect Nevada’s children and families from housing related hazards, including lead-based paint. The Division would like staff from these agencies to help spread the word to individuals and families on how to live healthy within their homes.

E. ANTI-POVERTY STRATEGY

Nevada’s anti-poverty strategy is based on helping families to move to economic self-sufficiency. Providing low-income households with assistance through various programs allows them to live in safe, decent and affordable housing. This helps to provide a base for them to maintain employment, provides a nurturing environment to raise children, and helps them become a part of the community where they work.

The State of Nevada Department of Health and Human Services (DHHS) is tasked with the responsibility of addressing poverty issues throughout the state. The DHHS oversees several programs that build capacity of social service networks to respond to the needs of Nevada’s residents.

One key funding source in the battle to end poverty is the federal Community Services Block Grant (CSBG) program. Approximately \$970,000 in CSBG funding provides Community Action Agencies (CAA’s) in 15 rural counties with the ability to move lower-income, poverty-level, and homeless households into self-sufficiency. In 2016, the CAA’s will utilize this funding to:

- Operate intake systems that assess individual and family needs and identifies state and local services that can assist families to remove barriers to self-sufficiency;
- Develop a network of relations with state agencies, local government agencies, non-profits, faith-based organizations, and local businesses to coordinate and deliver services to individuals and families;
- Work on strengthening and expanding partnerships from year to year, as they add new services, increase proficiency in servicing clients, and participate in community coalitions;
- Provide case management services to persons who are committed to attaining improved economic self-sufficiency. In most instances, case management involves coordinated services with multiple partner agencies;
- Continue adopting a more client-centered and driven service delivery model, including the development of self-sufficiency plans based on goals identified by program participants; and
- Development of job fairs, which has resulted in several job offers to participants.

Other continued efforts to move lower-income, poverty-level, and homeless households into self-sufficiency include improvements to transportation services that provide access to job training, employment opportunities, and counseling services. In addition, DHHS administers funding for family resource centers, which are located throughout the state in most of the larger communities and provide a variety of support services to families who have lower incomes. The family resource centers, in conjunction with local social service offices, are generally the initial point of contact for many individuals and families who are seeking assistance.

Finally, the Nevada Housing Division continues to fund projects that support housing and supportive programs. There are several nonprofit organizations in rural Nevada that have and continue to develop services and facilities to move very low-income and homeless persons to self-sufficiency. These efforts, along with programs provided by the CAA's and other partner agencies, will have a direct impact on the number of families living in property.

V. ONE YEAR ACTION PLAN

The following narrative describes the activities that the state of Nevada will undertake for each of the formula grant programs to which it receives funding: the CDBG, HOME, HOPWA and ESG programs.

METHOD OF DISTRIBUTION

A. COMMUNITY DEVELOPMENT BLOCK GRANT PROGRAM (CDBG)

The Community Development Block Grant (CDBG) program is a flexible program that provides communities with resources to address a wide range of unique community and economic development needs. Beginning in 1974, the CDBG program is one of the longest continuously run programs at HUD. Through the CDBG program, HUD provides annual grants on a formula basis to 1,209 general units of local government and States.

The CDBG entitlement program allocates annual grants to larger cities and urban counties to develop viable communities by providing decent housing, a suitable living environment, and opportunities to expand economic opportunities, principally for low- and moderate-income persons.

The State of Nevada is a recipient of the State Administered CDBG program, also known as the Small Cities' CDBG program. States award grants to smaller units of general local government that carry out community development activities. Annually, each State develops funding priorities and criteria for selecting projects. Nevada's priorities are established by the consolidated planning process, state priorities, and the regional community and economic development needs of the communities.

Funding Period

Grant applications are submitted early January with funding recommendations generally made before the end of March. Grant awards are effective July 1. The grant period is generally one year to 18 months depending on the type of grant and complexity of the project. Depending on the circumstances, grants may be extended beyond the expiration date. If additional time is required,

the grantee needs to submit a formal request to the CDBG Program Administrator. The request needs to include the reason for the delay, a reasonable revised timeline, and the estimated completion date for all deliverables. If necessary, the request is referred to the Advisory Committee (AC) for consideration.

Distribution of Funds

a. Unused Funds: Funds returned to the State by a grantee may be redistributed to another CDBG applicant or grantee. The distribution of unused funds may occur during the program year or during the annual allocation process.

b. Reallocated Funds: Funds reallocated to the State by HUD and funds recaptured from HUD-administered Small Cities grants and returned to the State by HUD may be redistributed to CDBG applicants or grantees in the same manner as unused funds returned to the State by a grantee. GOED may use up to two percent of the reallocated funds to administer the CDBG Program.

c. Additional or Remaining Funds: Additional funds received by the State as the result of action at the federal level will be distributed to CDBG applicants or grantees in the same manner as unused funds returned to the state by a grantee. Funds remaining at the state level may be distributed in the same manner as unused funds. GOED may use up to two percent of the additional or remaining funds to administer the CDBG Program.

d. Recaptured Funds: Funds that were distributed to a grantee and are later taken back may be distributed in the same manner as unused funds.

e. Program Income: This is gross income received by the state or eligible city or county and directly generated from the use of CDBG funds. Program income earned by eligible units of general local government through the Revolving Loan Fund (RLF) or the Housing Rehabilitation Program may be kept at the local level to continue economic development or housing efforts locally. Program income may be distributed to eligible applicants in the form of loans to for-profit businesses via local governments, or for grants for CDBG-eligible project such as infrastructure projects, housing activities, etc. Income earned from other CDBG activities may be retained at the local level and used to fund additional eligible community development activities. Communities electing to retain these funds must submit an intended use plan for the program income to GOED for approval prior to project closeout.

To be treated as program income, the total amount of funds received in a single year and retained by a unit of local government and its sub-recipients must be \$25,000 or more. Program income that is received by the State from the RLF program may be obligated and distributed to eligible grantees for economic development projects funded where deemed appropriate. The State may use two percent of the program income generated by the RLF program for program administration. Program income received by the State from projects other than the RLF program will be distributed in the same manner as unused funds returned to the State by a grantee. Program income received from the Housing Rehabilitation Set-Aside Program may be used to fund other CDBG eligible activities including housing activities where deemed appropriate.

Application Criteria

The CDBG Application: Rating criteria and other eligibility factors contribute to the final funding recommendations. Ranking criteria contains the following elements:

Question 1 & 2

Project Needs Analysis: [10 points] The applicant identifies the problem and how it is currently being addressed. The application details how the problem/need was determined and why the project is needed. The applicant addresses how the problem/need will be resolved and how the resolution will be monitored. This section also addresses how the applicant will know the problem has been resolved and the goal(s) of the project met.

Question 3

Scope of Work (SoW): [10 Points] Proposals are evaluated to determine if the proposed project is clearly defined and provides sufficient detail. The SoW must identify the project activities, milestones and deliverables. The SoW also identifies cost-sharing funds and notes if those funds are secured. The purpose of the proposed project is described in terms of the effect the proposed project will have on the community.

Question 4 & 5

Planning & Project Context: [10 points] The applicant provides details about how the proposed project contributes to the goals, objectives, and activities of the 2015-2019 Consolidated Plan. If the proposed project is specifically or generally identifying is a city, county, regional or other state plan, the applicant describes that contribution. The applicant also shows how the proposed project promotes long-term proactive planning in the area of the project.

Question 6 thru 9

Environmental Review (ER): [10 points] Proposals are evaluated based on the status of the ER: (1) has the level of environmental review been determined; (2) if determined, is the ER included with the application; (3) if a review includes other State or Federal funding, are those agencies identified and have they been contacted; (4) have environmental impacts associated with the proposed project been adequately addressed?

Question 10

Economic Development Impact: [10 points] In a continuation of the Planning & Project Context section, the applicant describes how the proposed project contributes to the area's Regional Redevelopment Authority's (RDA) planning goals and indicators. The applicant details the efforts of private investment, local government and the community in funding the proposed project. Additional detail on private funding may be included in this section. The applicant also provides research based post-grant impacts to the community on employment, tax increment increases, per capita income, and number of businesses impacted.

Project Budget Tab

Project Budget & Budget Justification Narrative: [10 points] Proposals are evaluated on the soundness of the project budget and the narrative, which explains: (1) each budget line item; (2) how the cost was determined; (3) the source of the estimate. The narrative identifies the proposed project's cost-sharing funds and whether they are secured or not. The application must provide letters of commitment or letters of intent for other funding sources.

Project Implementation Tab

Maturity & Project Readiness: [10 points] Evaluation of a proposed project assesses project readiness by reviewing information throughout the application and the supporting documentation. This includes but is not limited to: (1) commitment of cost-sharing funds; (2) the proposed timeline of the project; (3) ability of the proposed project to implement on July 1st; (4) status of proposed project if a phase in a multi-year project. Ownership issues, if applicable, are addressed in this section.

Additionally, eligible entities are assessed for Risk Analysis. CDBG staff members score the applicant based on general grant administration capacity, project readiness, and the ability to implement and maintain the proposed project. See Eligibility & Grantee Performance for detailed criteria.

Other Considerations:

Factors other than rating are involved in making funding recommendations. The project's rating is one of many factors taken into consideration by the CDBG Advisory Committee in recommending projects for funding. Other factors that may be considered during deliberation are:

- If an application with a high rating requests a large proportion of funds available, the Advisory Committee may take that into consideration and recommend other lower rated applications be funded in the interest of better use of funds.
- Additionally, phasing of larger projects, where practical, into freestanding segments is strongly encouraged to allow the AC to recommend partial funding for projects that might otherwise be non-fundable as a whole. In those cases, projects are partially funded allowing phased implementation with a reduced Scope of Work. In past years, these applications have been funded in their entirety. However, as HUD's allocation has decreased over the past decade, it has not always been possible to fully fund project with CDBG funding only. Multi-year projects may receive additional points when ranking in an effort to "do no harm" to these larger projects. In that effort, projects that receive a lower rating may be funded over projects with a higher rating.
- Project readiness is an important factor taken into consideration. The AC will pay attention to the starting and completion dates for projects, so funds are not allocated to a project unable to start for nine to 12 months or more. A grantee must be able to make a first draw down of funds within nine months of grant award (March 31st).
- The AC may consider the community's demonstrated efforts to seek other sources of funding for the project. If a community has not explored, secured, or exhausted resources available

at the local or state level to fund the project, the AC may choose to not recommend the project for funding. Examples of these resources include, but are not limited to, a local user fee, room tax, a local gas tax or setting up a general or special assessment district.

- Past performance on CDBG projects is also a consideration. This is one factor in the Technical Review of the application. If a community has not made progress on a previous year's grant, the committee may take this into account when considering whether the community will be able to effectively administer an additional grant. The capacity of the community to administer additional grants and the extent to which the community has received assistance from the State's CDBG program may also be taken into consideration in funding recommendations.
- Proposals must demonstrably address the primary objective of the Housing and Community Development Act as well as one of the three broad national objectives set out in the federal act passed by Congress. In accordance with federal law, the AC strives to meet or exceed the requirement that 70 percent of the State's CDBG funds for any three-year period must be allocated to projects that benefit LMI persons. The current three-year reporting period is 2015-2017.

Awarding Funds

Nevada has established a selection process that is used for considering which jurisdictions are awarded Community Development Block Grant funds. With the reversion of Carson City to the state program, there now are 27 units of local government (UGLG's) eligible to apply. Non-profits, including community and faith-based organizations, apply through sponsorship by an UGLG.

The process for awarding funds to state recipients is designed to include analysis and comments from a range of interested parties and the public at large.

Technical reviews by CDBG staff members determine the eligibility of the proposed projects. This initial review is designed to help ensure that the applicant is eligible, the activity and line items within the budget are eligible and a national objective is met. Additionally, staff members help clarify issues that will enhance the AC's understanding of the project. Once eligibility of a proposed project is established, CDBG staff members and others with public agencies that have expertise regarding the proposed projects review and rate applications. Reviews and comments are provided to the AC during the March allocation meeting.

All proposed projects determined to be eligible are cleared for AC review in ZoomGrants. In late March the AC meets to review and deliberate on which applications best meet the priorities of the 2015-2019 Consolidated Plan, the priorities of Nevada's Rural Community & Economic Development Division, other state and regional plans, and the needs of the communities as defined in the consolidated plan. For the 2018 Program Year, the allocation meeting was delayed until congress and the president approved a budget and the HUD allocations were known.

The AC is tasked with scoring the applications in advance of the allocation meeting. During the meeting, each applicant is permitted 15 minutes to present the project and respond to questions from the Advisory Committee. Communities not able to present in person, may do so via video.

In addition to the ranking criterion, selection of projects for funding may take into consideration emergency situations, public health and safety concerns, applicant performance and/or capacity, project readiness, leveraging and any other factors deemed relevant. The cost benefit to low and moderate-income persons is always a consideration and high priority. The advisory committee makes funding recommendations after the final rating and discussion of proposed projects.

The list of proposed projects recommended for approval is submitted to the Director of Rural Community & Economic Development and the Executive Director of the Governor's Office of Economic Development. A summary of the projects is then forwarded to the Governor for final approval. In the event of disagreement with the AC's recommendation or if an applicant appeals the decision of the AC, the matter is directed back to CDBG staff and GOED management for reconsideration.

Funding Categories

The allocation of resources is determined by a series of planning processes. The consolidated planning process involves CDBG eligible entities and other stakeholders from across the state. The end product of that process is the identification of priorities for the next five years. The 2015-2019 funding categories for HUD's four formula programs were expressed in 15 priorities. In addition to the statewide planning process, the eligible entities conduct three public participation meetings that occur September through December. These meetings help determine the needs (funding categories) in the various cities and counties. Local government officials prioritize the projects that are recommended for development as CDBG grant applications. The applications are submitted early January and reviewed and recommended for funding in late March.

The distribution of resources among funding categories is determined by the needs of the 27 eligible entities as described in the applications. There are no set allocation limits per funding category other than those imposed by HUD for the CDBG program for (1) administration and technical assistance and (2) public services. The allocation of resources among the funding categories is determined by the CDBG eligible entities in the rural, non-entitlement area of Nevada.

This Method of Distribution (MoD) of addressing funding categories applies to the 2018 grant allocation cycle. The Method of Distribution continues to focus more closely on economic development and collaboration with the Regional Development Authorities and projects that have greater community and economic development impact. This focus is expressed in a revised application form and rating criteria.

Amendment Process:

A grantee must request approval to change the size, scope, or beneficiaries of a project. If a project selected for funding requires an amendment, the process is as follows: The grantee makes a formal request to the CDBG Program Administrator or the Director of Rural Community & Economic Development to amend the grant agreement. If the request involves a major change in the Scope of

Work of the project, the AC may also be involved in the approval of any amendment to the grant agreement.

Monetary Increases:

Request for additional funds for an existing project must follow the same process as normal grant applications. The AC will make a funding recommendation to CDBG Staff and the proposal will be submitted to the Governor for final approval.

Scope, Purpose or Intent:

CDBG staff members may approve requests for minor changes in the scope of a project. If staff determines that a request constitutes a major change in the project, the request requires review by the AC with a recommendation to staff and the director for final approval.

Changes in the scope, purpose and intent include, but are not necessarily limited to, changes in the size, location, use and budget. Changes in the CDBG budget items that constitute 10 percent or less of the CDBG budget are considered minor and may be made by the grant recipient upon filing an amended budget with staff. Staff will review budget amendments that are more than 10 percent and less than 20 percent to determine whether the change alters the scope of the project. If staff members determine that the change in the budget does not constitute a change in scope, the amended budget will be accepted. If staff members believe the amendment changes the scope, the change will be referred to the AC for a recommendation to staff and the director for final approval. The AC must review changes in the budget amounting to 20 percent or more of the grant award.

Beneficiaries:

If a project was approved to benefit LMI persons and the proposed change results in the total percentage of LMI persons benefited being less than 51 percent, the change will be reviewed by the AC with a recommendation to staff and the director for final decision. The current three-year period for meeting the 70% of project benefiting people who are LMI is 2015-2017. Nevada's non-entitlement program has historically been at a higher percentage than 70.

NOTE: If the project scope, purpose, intent, location or beneficiaries changes substantially, the local government shall follow the State's Citizen Participation plan by providing citizen's reasonable notice of and an opportunity to comment on the proposed changes.

Grant Size

There is neither a maximum nor minimum limit on the amount of a grant award. In past years, the practice has been to recommend approval in such a manner as to distribute the limited funds as widely as possible while still meeting the most urgent needs of the communities. However, with an increased emphasis on larger community and economic development projects, and an effort to encourage fewer

and larger grants, applications that address those priorities would have a higher rating than those applications that do not address the priorities.

Outcome Measures

The method of distribution ensures that outcome measures are more clearly defined and more readily measured by the development of revised application rating criteria. Local public participation contributes to the determination of need by the units of local government. Additionally, because the UGLGs participate in the consolidated planning process, and are the entities that help determine priorities and goals, they also help establish outcome measures during that planning process. Those outcome measures are to provide: (1) suitable living environments; (2) decent housing; (3) increased economic opportunities.

B. HOME INVESTMENT PARTNERSHIP PROGRAM

The HOME funds are allocated to all Participating Jurisdictions (PJ's) in the State. The State has decided to allocate the HOME funds based on population to ensure that each Nevadan receives the same amount of funding. If the State were to only distribute HOME funds in the non-entitled areas those areas would receive approximately four times the amount of funding that other PJ's receive. Therefore, the State takes into consideration all the HOME funds coming into the State and distributes the State funds based on a population formula.

The allocation for other Participating Jurisdictions in the State are as follows:

Clark County HOME Consortium - \$752,435
City of Henderson - \$179,563
City of Las Vegas - \$378,001
Washoe County HOME Consortium - \$269,858
Non-entitled area of the State - \$1,127,468
Administration - \$300,813

Application Criteria

The State will allocate the non-entitled portion of the HOME funds to only non-entitled areas. We will make funding Low Income Housing Tax Credit projects as our first priority and will evaluate remaining projects and make selections based on need and funding remaining.

Funding Categories

HOME funds and Low-Income Housing Tax credits will be used for multi-family projects whether they are new construction or rehabilitation. HOME funds will also be used for down payment assistance and homeowner rehabilitation programs. The State will use the majority of its Trust Funds for tenant based rental assistance in the non-entitled areas of the state.

Grant Size

Threshold factors are mainly based on the amount of funding the State has for the project and how many projects are successful in obtaining Low Income Housing Tax Credits. The average amount of HOME funds that traditionally have funded a tax credit project is about \$400,000, but with recent changes in the federal corporate tax rate and increases in cost of raw material and labor, tax credit projects are increasingly relying on soft debt such as HOME to fill ever-widening gaps. The State usually allocates \$300,000 to down payment assistance/homeowner rehabilitation projects.

Outcome Measures

Nevada Housing Division expects that it will be able to fund all its priorities using this method of distribution. NHD foresees funding multi-family new construction projects, multi-family rehabilitation projects, a down payment assistance program and a homeowner rehabilitation program.

C. NATIONAL HOUSING TRUST FUNDS

Funding Categories

The NHTF and Low-Income Housing Tax Credits will be used for multi-family projects with a focus on new construction. The NHTF will be used for projects within those categories described in NHD's most current applicable Qualified Allocation Plan (QAP).

The HUD interim rule regarding the NHTF requires that NHTF target 75% of its allocation to benefit extremely low-income households or households with income below the federal poverty level (whichever is greater) and more than 25% of a state's NHTF allocation may benefit very low-income households.

Grant Size

The Division does not have a funding threshold and there are no maximum or minimum grant limits for the NHTF. Awards will be based on data provided by applicants in the NHTF Application as well as a review of the provided information along with data generated by the Division, policy, and the Division's QAP.

Outcome Measures

The State intends to work closely with the Nevada Interagency Council on Homelessness to develop performance outcomes for recipient projects of national NHTF monies. The resulting performance outcome document will reflect related goals, measures and expected outcomes for all projects funded through this program.

D. EMERGENCY SOLUTIONS GRANT PROGRAM

Through public meetings and conversations with the local Continuum of Care, the State received input as to how to prioritize ESG allocations. The following actions were all mentioned as high

priorities in rural Nevada:

- Continue the support of existing emergency shelter and transitional housing for the homeless, including domestic violence shelters;
- Create additional transitional and permanent housing, including rapid re-housing assistance; Provide financial support to households at imminent danger of becoming homeless; and
- Support effective data collection and entry activities for services provided.

Regulatory changes made to the ESG program in 2009 limits the amount of funding that can be used to support emergency, transitional and domestic violence shelters for the homeless each year. Regulations placed a sixty (60) percent cap on the amount of funds that may be allocated for these programs, resulting in financial impacts to shelter operations and essential services programs that have been established for many years. As a result, the Division will continue to fund the maximum amount allowed to established sub-recipients that operate homeless shelters, transitional housing for the homeless, domestic violence shelters, and programs that provide motel vouchers in areas without access to homeless shelters. Remaining funds will be allocated for rapid-rehousing and homeless prevention programs, along with HMIS and data collection costs.

Since requests for ESG funding exceeds the amount of funds allocated by HUD each year, State Low-Income Housing Trust Funds will be used to supplement the rapid re-housing and homeless prevention programs to ensure priorities for the housing of people who are homeless and those at imminent risk of homelessness are addressed.

Application Criteria

Rural Allocation: Due to limited amount of funding available, preference shall be given to agencies that currently are recipients of ESG funds; can demonstrate successful implementation of their programs; and are actively helping to meet the objectives of the Division, HUD, and the Rural Nevada Continuum of Care (RNCOC).

Preference will be given to agencies that choose activities to help homeless and chronically homeless individuals and families to obtain and maintain shelter and housing. Division staff shall review rural area Requests for Funds to ensure that instructions have been followed; that the project/program is eligible to receive ESG funds; the project/program meets the needs and priorities reflected in the State's Consolidated Plan; and the project/program will address the goals and objectives of the RNCOC. The Division will convene a review panel to rate and rank all Request for Funds received. The panel will include persons qualified to make decisions about programs and services offered to assist homeless and at-risk of homelessness persons, including members of the Rural Nevada Continuum of Care, the VA, and Rural Housing Authority. Division staff will present allocation information to the RNCOC for approval. Agencies will be chosen, and final allocations will be made, based on recommendations received from the RNCOC.

Allocations provided to local consortiums, such as the City of Reno or Clark County will be decided locally. There will be no application review process conducted by the Division for funds allocated as they are responsible for selecting agencies to receive funds within their community; choosing the

eligible activities that shall be funded with State ESG funds; consulting with local Continuums of Care to determine how to allocate ESG awards; developing performance standards in alignment with the local Continuum of Care; and evaluating outcomes of projects and activities assisted with ESG funds to ensure success of the State's ESG program. As required by program regulations, the Division shall also engage the local CoC to ensure that ESG-funded activities chosen will address the goals and objectives of the CoC.

Awarding Funds

ESG funds are passed through the State of Nevada Housing Division and are directly allocated to city, county and non-profit organizations in Nevada who submit a Request for Funds application. City and county recipients may award to local homeless providers, but due to limited number of providers in rural communities all government agencies retain funds to implement programs directly. In 2018, six (6) county social service and health and human service agencies in rural Nevada have applied to receive State ESG funds.

State ESG funds may also be allocated to the City of Reno and Clark County as State Recipients. Each will be responsible for awarding to sub-recipients in their area(s), if desired.

Funding Categories

The following activities will be funded with ESG and State Low-Income Housing Trust funds:

- Shelter Operations and Essential Services;
- Homeless Prevention and Rapid Re-housing rental assistance;
- Housing Relocation and Stabilization costs, including case management salaries, utility assistance, etc.

Funds allocated for shelter operations, motel vouchers, and essential services will not exceed 60% of the total allocation, which is the most allowed by program regulations.

Grant Size

The Division does not have a funding threshold and there are no maximum or minimum grant limit for the Emergency Solutions Grant Program. Awards shall be based on data provided by applicants in the ESG Request for Funds application, homeless point-in-time data, and data provided for existing programs via HMIS. Selected activities will address priorities of HUD, Continuum's of Care, and the Division.

Outcome Measures

The State works closely with local Continuum's of Care to develop performance outcomes for sub-recipients of state ESG funds. In rural Nevada performance outcomes were created jointly and are reflected in the "Rural Nevada Continuum of Care and State Emergency Solutions Grant Program Performance Evaluation Tool." This document reflects goals, measures and expected outcomes for all projects funded through the CoC and State ESG-funded programs.

D. HOUSING OPPORTUNITIES FOR PERSONS WITH AIDS (HOPWA)

Northern Nevada HOPES is the sole project sponsor of the HOPWA program for the entire state of Nevada excluding Clark County (Las Vegas area). The HOPWA program is designed to assist HIV positive individuals at-risk of homeless with rental, mortgage, and utility assistance; as well as assistance with move-in costs associated with securing permanent housing.

Project sponsors who are awarded HOPWA funds may use funds to:

1. Provide Short-Term Rental and Mortgage Assistance (STRMU) for 21 weeks out a 52-week calendar year;
2. Provide Tenant Based Rental Assistance (TBRA) to individuals who will need long-term financial assistance to prevent homelessness;
3. Provide Supportive Services (SS) Assistance to individuals in need of financial help to obtain items that are required prior to being approved for a rental unit, such as a state issued ID;
4. Provide Permanent Housing Placement (PHP) assistance to individuals who need financial assistance with unit move-in costs such as first month's rent and deposits.

Application Criteria

The results of the Request for Proposals for the HOPWA program were announced in 2011. At the time of the announcement four organizations expressed interest in bidding on the project, but only Northern Nevada HOPES submitted a complete proposal. Because of their proven track record and expertise in the field, Northern Nevada HOPES was granted funding.

If more than one agency submits a request for funding for the HOPWA program, preference will be given to agencies that are current past recipients of HOPWA funds; can demonstrate successful implementation of the HOPWA program; have chosen to utilize HOPWA funds on activities that will prevent homelessness amongst the HIV positive community, and are actively helping to meet the Objectives of the Division and HUD.

Awarding Funds

HOPWA funds will be passed through the State of Nevada Health and Human Services (DHHS): Division of Public & Behavioral Health and will be allocated to local for-profit and non-profit organizations throughout Northern Nevada. Because Clark County (Las Vegas) receives funding for housing assistance from HUD HOPWA separately and Las Vegas TGA receives Ryan White Part A program, HOPWA funds are solely allocated to Northern Nevada and the rural areas. Project Sponsor for Northern Nevada, HOPES, receives the entire HOPWA grant minus three percent that is retained for State Administration.

Funding Categories

The State does not allocate funds to specific HOPWA sub-programs (TBRA, STRMU, PHP, SS), instead the program sponsor receives a total funding amount and the State allows them to utilize the funds based on identified client needs. The only allocation contained within the funding award is Administration, which is limited to seven percent of the total award amount.

Grant Size

The HOPWA program does not have formal Threshold Factors or Grant Size Limit. Threshold factors are mainly based on the amount of the State funding award. Size of the award to the project sponsor also depends on the quality of the application. The average amount awarded to the project sponsor is \$275,000.

Outcome Measures

The Division of Public and Behavioral Health expects that the current method of distribution will enable it to meet identified priority areas. We foresee continuing to fund our current project sponsor who provides housing assistance to individuals who are HIV positive and at-risk of homelessness in Northern Nevada.

E. HOMELESS STRATEGIC PLAN AND COORDINATION WITH THE CONTINUUMS OF CARE

The Strategic Plan developed as part of the five-year Consolidated Plan identified several gaps in homeless housing and services. Lack of adequate housing resources included emergency shelter, transitional housing and permanent supportive housing. The greatest need for individuals was permanent supportive housing, while the greatest need for families was emergency shelter. Social services, including case management and mental health/substance abuse treatments, were also considered to be a high need for homeless persons.

Rural Nevada currently has access to two homeless shelters and several domestic violence shelters. In addition, many communities without access to a homeless shelter have developed programs utilizing motel vouchers in emergency situations. In 2018 two homeless shelters located in Elko and Carson City, along with two domestic violence shelters in Carson City and Winnemucca applied for ESG funds to offset costs of shelter operations. ESG funds may also be used to provide case management of clients residing in the shelters or accessing services offered by the provider.

Programs and services provided by the shelters will include food, shelter, life skills classes, transportation for shelter clients to and from the shelter and other services, clothing, showers, access to prescriptions, work permits, birth certificates, and other services as available.

Housing assistance programs offered by homeless service providers shall include rental assistance for up to 12 months in some communities, and may be extended if funding is still available and the program participant's needs are warranted. Assistance will be offered to individuals who are

homeless and to families, including veterans and victims of domestic violence who are currently in shelters or other inhabitable areas.

Limited funding will mean not as many clients will be aided, but communities are motivated to address the ongoing issues of homelessness and have become quite creative in partnering whatever resources are available to ensure as many homeless are provided housing as possible. Many communities will utilize State Low-Income Housing Trust funds for rental assistance, using ESG and CDBG funds for Housing Relocation and Stabilization services described in the next paragraph.

Housing relocation and stabilization services will be used to provide case management to program participants, along with utility payments, utility deposits, security deposits, and rental application fees for program participants. Agencies will utilize all available mainstream resources available to homeless person within a community to ensure the ongoing success and stabilization of the household.

In northern Nevada, the City of Reno is a State Recipient of a portion of the Divisions ESG funds. Funds may be used to support rapid re-housing programs for homeless individuals and families in Washoe County.

The State can also allocate funds to the Homeless Management Information System Lead Agency to be used to offset costs of the statewide HMIS database.

Reaching Out to Persons Who are Homeless

The Division requires agencies to engage homeless persons within a community so they have access to available resources through Homeless Connect activities, veteran outreach functions, and by engaging households who have children in the “Kids in Transition” program at local schools. A number of communities have created a coalition of agencies, including social service agencies, hospitals, police, fire, and mental health providers. These groups meet monthly to identify the most frequent users of community emergency services and collaborates in shared case management to meet the most urgent needs of the individuals identified. Clients are then engaged and are provided access to available housing and services. Many ESG sub-recipients also receive other HUD Homeless Assistance funding, and act as lead agencies for this process. Some ESG sub-recipients receive outreach funding to lead individuals to Emergency Shelters or Rapid Re-Housing.

Many rural ESG recipients are also the local Coordinated Entry Lead Agency, and are working with community providers to access available programs and services for homeless clients. As part of the coordinated entry process, agencies complete an assessment in the Homeless Management Information System (HMIS) database that will provide information on the client’s vulnerability. Clients are referred to available programs and services within the community or within the rural area. Many are referred to Nevada Rural Housing Authority (NRHA) to see if they are eligible to receive a limited number of Tenant-Based Rental Assistance vouchers funded with State Low-Income Housing Trust Funds. If accepted, the client will receive up to 24 months of rental subsidy, and will be “fast-tracked” into the Housing Choice Voucher program once a voucher is available. If accepted into the Housing Authority’s rental assistance programs, clients will also be referred to a coordinator at Atlas

Counseling Center who will oversee all case management needs of the household, including assistance with basic skills training, anxiety management, anger management, conflict resolution, behavior management, communication skills, and health care services, such as physical and occupational therapy, Respite Care assistance with injections, and monitoring of serious illness/unstable health conditions. Clients will also have access to grooming assistance, dressing assistance, meal preparation, diet monitoring, light housekeeping, and help with errands and shopping. NRHA has made the homeless population a priority to receive assistance in their HCV program as part of the Coordinated Entry process, and will partner with a counseling group to ensure the most vulnerable homeless clients are provided the care needed to ensure long term stability.

In northern Nevada, Volunteers of America will ensure that homeless individuals in the area are aware of the services provided at the Community Assistance Center Campus (CAC). Outreach staff go out weekly to educate unsheltered individuals on services available and to help address any barriers/concerns they may have regarding accessing assistance at the CAC. The City will provide a full-time case manager to screen clients who may be eligible for rapid re-housing offered by the City.

Addressing the Emergency Shelter and Transitional Housing Needs of Persons Who are Homeless

In rural Nevada, funds will continue to be used to offset shelter operation costs of two (2) homeless and one (1) domestic violence shelter. In addition, ESG and State Trust Funds will be used by communities without access to homeless shelters to provide motel vouchers and case management services. Shelters will provide case management of clients residing in the shelters or accessing services offered by the provider, and will issue referrals to transitional and permanent housing programs.

The Division will allocate no more than 60% of its 2018 allocation to emergency shelter and essential services activities, as mandated by program regulations. It is anticipated that 500 homeless persons will have access to emergency and domestic violence shelters supported through the Division's ESG program.

Helping Homeless Persons (especially chronically homeless, families with children, veterans, and their families) to make Transition to Permanent Housing and Independent Living.

The State ESG Program and Continuums of Care throughout the State have implemented a goal that, depending on the area and type of program, strive for up to 50% of homeless households served be "harder to serve" homeless populations. "Harder to Serve" populations are defined as having one or more of the following issues:

- Mental illness
- Alcohol abuse
- Drug abuse
- Chronic health conditions
- HIV/AIDs
- Developmental disabilities
- Physical disabilities, or

- Are chronically homeless

The Rural Nevada Continuum of Care has developed a Coordinated Entry process that requires lead agencies to utilize the VI-SPDAT assessment tool to determine the most vulnerable residents. Applicants who are “harder to serve” will score higher on the VI-SPDAT and will receive priority access to available housing and mainstream resources. Agencies with staff trained in SOAR practices will assist clients applying for Social Security Disability. Funding for case management to ensure the long-term stability of program participants will be provided with ESG and Community services Block Grant funds.

Agencies are encouraged to reduce lengths of homelessness episodes and new and returned entries into homelessness by requiring programs to ensure that at least 80% of homeless persons stay in permanent or transitional housing for at least six (6) months. Recipients of ESG and CoC funds shall also be required to increase jobs, income and self-sufficiency of program participants, and shall be measured annually to ensure these objectives are met.

The State ESG Program has also encouraged agencies to increase the number of veterans provided access to permanent housing and to increase the number of families with access to rapid rehousing and homeless prevention assistance. In 2017, the Division will allocate State Low-Income Housing Trust Funds to the local Veteran’s Resource Center (VRC) to provide temporary rental assistance until the veteran and/or his/her family becomes eligible to receive SSVF funding. In addition, the Nevada Rural Housing Authority (NRHA) is also partnering with the VRC to help clients who may be eligible for VASH vouchers to receive assistance with the housing eligibility process.

Coordinated Entry Lead Agencies will facilitate access for homeless individuals and families to available affordable housing units. Databases, such as the one located at NVHousingSearch.org, offers free access to a rental database that matches units with the needs of the clients. Case managers can access a portal for social service agencies that provides information about landlords who have asked to be connected to agencies working with special needs groups, such as veterans, frail and elderly, physically disabled and more.

NRHA has applied for an allocation of State Low-Income Housing Trust funds to provide up to 24 months of rental assistance to the most vulnerable homeless populations who have been referred by local Coordinated Entry Lead Agencies. NRHA has agreed to prioritize homeless households for receiving Housing Choice Vouchers and clients who have been referred via the coordinated entry process will be “fast-tracked” to receive permanent housing vouchers as they become available. NRHA will also refer clients to a partner counseling center with staff trained to provide psychosocial rehabilitation including anxiety management, anger management, conflict resolution training, behavior management, and other basic needs, such as assistance with setting up appointments, accessing food and clothing, transportation and other community resources. Due to the limited amount of funding, it is anticipated that 12 households will receive this assistance each year.

Goals for Reducing and Ending Homelessness

The Division has implemented requirements that direct agencies receiving ESG allocations to reach

out to homeless persons through various means. It is the intent of the Division to reduce the length of time persons experience homelessness by 5% each year, and to reduce returns to homelessness by 20% using ESG funds and other available resources.

To help the Division to meet these goals, rural communities will continue to partner with local sheriff and police to outreach to homeless clients; agencies will engage other community members to garner referrals; partnerships will include churches that routinely walk the streets and camps, providing homeless information, food, clothing, blankets and referrals to providers; and community providers will supply case managers to interview homeless during point-in-time counts and other outreach events. These activities will create opportunities to provide referrals to available services and programs, including the VA and access to HUD VASH Housing vouchers, the Section 8 program, and other homeless programs funded through local Continuums of Care.

In northern Nevada Volunteers of America will insure that homeless individuals in the area are aware of the services provided at the Community Assistance Center Campus (CAC). Outreach staff will go out weekly to educate unsheltered individuals on services available, and to help address any barriers/concerns they may have regarding accessing assistance at the CAC. The City will provide a full-time case manager to screen clients who may be eligible for rapid re-housing programs offered by the City.

Transitions to Permanent Housing

The State ESG Program and Continuums of Care throughout the State have implemented a goal that, depending on the area and type of program, requires up to 50% of homeless households served be "harder to serve" homeless populations. "Harder to serve" populations are defined as having one or more of the following issues: mental illness, alcohol abuse, drug abuse, chronic health conditions, HIV/AIDs, developmental disabilities, physical disabilities, or are chronically homeless.

Agencies will be required to reduce lengths of homelessness episodes, and new and returned entries into homelessness, by requiring programs to ensure that at least 80% of homeless persons stay in permanent or transitional housing for at least 6 months. Recipients of ESG and CoC funds shall also be required to increase jobs, income and self-sufficiency of program participants, and shall be measured annually to ensure that these objectives are met.

The State ESG Program has also encouraged agencies to increase the number of veterans provided access to permanent housing, and to increase the number of families with access to rapid rehousing and homeless prevention assistance.

Funding for case management to ensure the long-term stability of program participants will be provided with ESG and Community Services Block Grant funds.

Helping low-income individuals and families avoid becoming homeless

In rural Nevada service providers in local communities are working closely with each other to ensure low-income individuals and families avoid becoming homeless. Communities have implemented

informal and formal Memorandums of Understanding with local jails, health care facilities, mental health providers, Division of Child and Family Services (DCFS), Child Protective Services, (CPS) schools, and other facilities and programs so that providers are engaged when a homeless or at-risk of homeless person or family has been identified.

Community Coalition meetings are held throughout the year as the forum to develop protocols to ensure the homeless and low-income households have access to programs and services, including housing if available. Participants include local hospital staff, Sheriff's deputies, Fire Department Emergency Management Systems staff, emergency shelter staff, behavioral health, family rescue centers, and public guardians. The coalitions work together to identify the most vulnerable residents that are repeatedly using emergency services without a long-term plan.

Homeless liaisons at local school districts are also working closely with providers to help families gain access to housing and supportive services. Community meetings have identified the need for at-risk of homelessness assistance, however ESG funding will be limited for this type of program. Agencies will utilize other funding sources such as State Low Income Housing Trust funds to insure individual and families at most risk of homelessness are assisted.

F. FOSTERING AND MAINTAINING AFFORDABLE HOUSING

The Consolidated Plan indicates the relative priorities for assistance among 1) different categories of extremely low-, very low- and low-income households with needs for housing assistance, and 2) the activities appropriate for meeting the identified needs.

The principal features for achieving the objectives of this strategy include:

- Increasing the supply of standard, affordable rental housing through the rehabilitation of existing housing and the construction of new units;
- Promoting home ownership opportunities through the acquisition and rehabilitation of housing, the construction of new single-family homes, and the provision of below market rate mortgage financing;
- Preserving existing home ownership through the renovation of owner-occupied single-family homes;
- Providing rental assistance to alleviate rental cost burden experienced by very low and low-income households;
- Providing affordable housing opportunities designed to meet the needs of the elderly, people with disabilities, large families, and other special needs groups;
- Addressing the needs of homeless individuals and homeless families through the provision of services and assistance to shelter operators;
- Providing opportunities for nonprofit community organizations to develop and execute projects which benefit lower-income residents;

G. MONITORING AND AUDIT REQUIREMENTS

To ensure that all statutory and regulatory requirements are being met for activities with HUD funds,

the State uses various monitoring standards and procedures. Following are Program Specific Monitoring Standards and Procedures.

HOME, NHTF & ESG Program Monitoring Plans

The Division will monitor recipients for compliance with applicable HOME and ESG regulations based on the following processes:

a. Application Process: Some documents and budget issues necessary for compliance are required at the time of application for funding and will be reviewed for compliance standards.

b. Contractual Agreement: The Division will incorporate into its award letter many of the policy issues that are areas of concern to HUD and the Division. These agreements signed by authorized agency personnel represent their willingness to comply with these issues.

c. Draw Process: Draw processes for reimbursement of funds have been created to include various areas of compliance required by HUD. Supporting documentation will be reviewed prior to the actual request of funds from HUD. Agencies that choose to summarize their expenses and not submit actual copies of supporting documentation will be earmarked for a more detailed review during on-site visits.

d. On-Site Review: On-site visits for certain aspects of compliance-such as facility verifications, equipment inventory, review of client files and accounting records that cannot be monitored by other components of the grant process will be conducted as scheduling allows.

Sub-recipients will be notified in writing via email at least two weeks in advance of the site visit. The notification letter will include a summary of the review and all checklists and tools that will be used by Division staff during the review. A following is a sampling of what will be reviewed during an on-site visit:

- Policies and Procedures and any Program Guidelines (copies will need to be included as part of the site visit record);
- Evidence that funds are being used as submitted in the program application (will be determined during overall review of program);
- Supporting documentation for expenditures;
- Client files for dates selected, including eligibility documentation;
- Wage documentation/time sheets for salaries charged to the grant to ensure costs are categorized appropriately for time periods reflected above (if applicable);
- Match documentation;
- Program Income; and
- HMIS user agreements and policy statements to ensure documents meet client confidentiality requirements, a review of user security protocols and data input procedures, if applicable. A self-assessment survey shall be completed by sub-recipient staff prior to the

visit which will be reviewed by Division and sub-recipient staff during the visit.

e. **Financial Monitoring:** Monitoring visits recipients will be made to review the financial records of the agency. Recipients will be asked to make available all accounting records applicable to the project (grant) being reviewed. Verification of documented program matching funds and/or other resources (i.e., bank statement, canceled checks and volunteer hours) as well as evidence of any sub-contracts awarded and paid by the recipient are among the types of documentation to be made accessible for review. A review of the agencies most recent Single Audit or Audited Financial Statements will also be conducted during the financial monitoring process. Additionally, recipients that fail to request reimbursements in a timely manner will be counseled on the need for a more expedited process to ensure that funds are drawn in a timely manner.

f. **Programmatic Monitoring:** The Division will conduct a programmatic review of recipients to evaluate program management in compliance with the application submitted to the Division, assess the accomplishments of the program, and to offer technical assistance where required. Items reviewed during the scheduled programmatic site visit include: financial management system, record keeping system (including all financial, contractual, environmental, progress reports, and client complaint data), as well as the current budget and amendments.

HOPWA Monitoring Plan

Annual monitoring occurs to ensure that programmatic and fiscal guidelines are followed. Monthly fiscal reconciliations are submitted to, and reviewed by the State of Nevada. HOPES staff ensures eligibility criteria and completes all required documentation prior to providing housing services to any individual. Eligibility to other local housing resources is conducted prior to a client being placed on the program. Case files are maintained per regulations and HOPES policy and procedures. DPBH and HOPES staff receives technical assistance when needed and remain up to date on all regulations and policies related to the HOPWA program.

CDBG Program Monitoring Plan

To ensure that all Federal and State statutory and regulatory requirements are met for activities with HUD/CDBG funds, the Rural Community Development Division/CDBG has established the following monitoring standards and procedures.

The formal CDBG Monitoring Plan is a three-step process: 1) Risk Analysis, 2) Desk Monitoring, 3) On-Site Monitoring. Risk Analysis is conducted annually on all grantees and open files. Risk is based on points assigned to various factors, including but not limited to: a) the number and dollar amount of open grants, b) complexity of the project(s), c) significant outstanding audit issues, d) outstanding compliance issues, e) management history. Risk level is based on points assigned to each factor. Extreme Risk is 66 to 85 points; High Risk is 46 to 65 points; Moderate Risk is 21 to 45 points; Low Risk is 0 to 20 points. Scheduling of on-site reviews is highly determined by the degree of risk assigned. Presently, the State of Nevada is revising grantee monitoring policies and procedures. While CDBG staff members review policies and procedures on an on-going basis, future CDBG monitoring policies and procedures will be revised to reflect any significant state revisions.

The second step of monitoring is Desk Monitoring, which occurs throughout the life of the grant. Daily, weekly, and on-going technical assistance is offered prior to application submission, during project implementation, and through close out of the grant. Initially, the application is reviewed by staff to ensure the project eligibility and alignment with a HUD National Objective. Once the application is approved for grant funding, staff approves final budget changes, reviews project beneficiaries, leveraging, and scope of work for required documentation.

All projects must have an Environmental Review. No project can commence until the review process is completed and a Notice to Proceed has been issued by the Director of Rural Economic & Community Development or CDBG Administrator. Compliance with the environmental review throughout the project and through closing is monitored. An on-site contact, who monitors for environmental compliance throughout the project and close out of the project, is designated at the pre-construction meeting. This is not a substitute for CDBG staff monitoring of the project but is a coordinated effort to ensure compliance. Additionally, all change orders submitted to the CDBG Program Administrator and reviewed for potential impact on the environment and/or any effect the change order may have on the initial level of environmental review can be determined.

The preparation and publication of Request for Quotes (RFQs) and bid documents are carefully monitored, as are all the labor issues in project implementation.

Monitoring continues with the draw down process. All requests must have the correct supporting documentation; requests are reviewed by two staff members. A third person in the Accounting Unit approves the disbursement and draw down from HUD. If any documentation required for grant implementation has not been submitted, the draw request is held until all documentation is received. Additionally, progress and compliance are checked each time a Draw Request is made. Draw Request procedures have been developed that include HUD compliance requirements.

Quarterly Reports also provide additional updates on the progress of each project. This provides another opportunity to detect any problems.

Where administrative difficulties do arise or where issues of non-compliance are observed, technical assistance is provided by telephone, email, or on-site. All grantees are site monitored a minimum of every other year. All construction grants are monitored. Desk audits are conducted prior to field visits and inspections.

The CDBG Program Administrator conducts reviews of audits to determine compliance with applicable accounting regulations. Audit results are tracked on a spreadsheet and addressed in desk monitoring or site monitoring.

On-Site Monitoring is a structured review conducted at the location where the project activities are carried out or where project records are maintained. Prior to a site monitoring visit, a monitoring email letter is sent to the grantee requesting documents required for the grant review.

During a site visit, grantee files are reviewed for appropriate documentation to satisfy compliance

with the Department of Housing and Urban Development's (HUD) requirements. Files also are reviewed for organization and management of the Application Process, Financial Management, Environmental Review, Bidding and Contractor Selection Processes, Contractor/Sub-Contractor Management and Labor Compliance, Project Benefits, Section 3, and Equal Opportunity/Civil Rights/Fair Housing and Non-Discrimination Records. A Monitoring Review Form is used to ensure all issues are addressed.

Close-Out of Grants: Once a grant file has been monitored for closing, it is closed in IDIS. Additionally, another monitoring/financial management tool used is the CDBG Property Log. After reviewing a grant file for close out, the State maintains a record of CDBG property acquired by its recipients. Maintenance of a property record helps ensure there is no unauthorized change in the use or disposition of real or personal property acquired or improved with CDBG funds.

After project close out in the CDBG office, a letter is sent to the grantee. The letter references the five-year retention period required by HUD for all real and personal property acquired or improved with CDBG funding.

Grant Maintenance: In addition to monitoring, CDBG staff review reporting formats used by sub-recipients to ensure ease of use, while gathering the required data and information. During annual Grant Administration Workshops, reference manuals and guidebooks are distributed to all attendees. The guidebooks include reporting forms. Instruction is given on labor compliance, financial management, procurement, record keeping and filing, reporting, and the monitoring process.

CDBG staff members and contractors work diligently to close grants within the agreed timeline. Currently grant years through 2010 are closed. Grant year 2011 was expected to close in 2016. However, the HUD closeout letter has not yet been received.

To avoid problems with future projects, the CDBG Advisory Committee is advised each year to give priority in the allocation of funds to communities that are clearly "project ready." Actions such as this help with the timely use of HUD funds and close-out of grants.

H. NEEDS OF PUBLIC HOUSING

This section pertains to grantees who also oversee public housing authority activities. These activities are administered by Nevada Rural Housing Authority (NRHA), Reno Housing Authority (RHA) and the Southern Nevada Regional Housing Authority (SNRHA). Each Authority is responsible for submitting an Annual Action Plan. Please refer to the following links for additional information regarding actions that will occur at Public Housing Authorities in the State of Nevada.

NRHA: <http://www.nvrural.org/sites/default/files/HousingPlan2013.pdf>

City of Reno: http://www.renoha.org/pdf/Misc/Annual_Plan.pdf

Southern Nevada HA: <http://www.snrha.org/pdf/Snrha-5yr-Plan-2011-2016-Updates.pdf>

The Nevada Housing Division, in conjunction with nonprofit housing providers, local governments and private sector participants, works to develop safe, affordable and decent housing. Programs such

as down payment assistance, rehabilitation of existing single/multi-family units, and development of new multi-family units allow the Housing Division to address the needs of the state residents.

Actions planned

In rural Nevada, the Housing Division will provide State Low-Income Housing Trust Funds to Nevada Rural Housing Authority (NRHA) to subsidize the Housing Choice Voucher program; aiding homeless populations who have been referred to them by Coordinated Entry Lead Agencies. NRHA staff will work with Atlas Counseling Center to ensure clients in this program receive appropriate case management and care, including basic skills training, psychosocial rehabilitation, and case management assistance, including assistance with obtaining food, clothing, transportation, and access to other community resources. Clients will have access to therapeutic after school programs for children with emotional and/or behavioral problems, structures and supportive environment emphasizing skill development and behavioral management, and homework help if needed. The Counseling Center also provides Licenses Clinical Social Workers or Marriage and Family Therapists. Finally, clients will receive assistance with basic home care such as grooming assistance, dressing assistance, meal preparation, light housekeeping, medication reminder, Respite Care for family caregivers, and help with shopping and errands. The Counseling Center also has access to physical and occupational therapy, skilled nursing care, wound care, and other monitoring of serious illnesses or unstable health conditions.

Additional funds will be allocated to NRHA for a security deposit program that is provided to Housing Choice Voucher tenants needing financial assistance to obtain housing.

State funds that are passed through to local jurisdictions may be used in the same manner in northern and southern Nevada, but it is the decision of the local consortiums to support local housing authorities with their allocation of funds.

In rural Nevada, the NRHA oversees the “Home at Last” program for 1st-time homebuyers and provides up to 4% of the loan amount for down payment assistance. In addition, the Housing Authority oversees the Mortgage Credit Certificate program which provides a dollar-for-dollar federal income tax credit equal to 20% or 50% of the interest paid on a mortgage loan. The tax credit is provided to the homebuyer every year; annual savings are estimated at an average of \$2,000 per year. The Housing Authority also works with eligible Housing Choice Voucher recipients to set aside funding to assist them in becoming 1st-time homebuyers.

I. ENHANCING COORDINATION BETWEEN PUBLIC AND PRIVATE HOUSING AND SOCIAL SERVICE AGENCIES

Throughout the State of Nevada there exists an effective coordination effort between public and private housing and social services agencies. For example, in rural Nevada members of the Rural Nevada Continuum of Care (RNCOC) include: 1) staff from Nevada Rural Housing Authority, which oversees the Housing Choice Voucher and HUD VASH Voucher programs; 2) a number of county social services agencies, a few who are also recipients of HUD Supportive Housing and Shelter + Care funds; 3) staff from the State's Office of Mental Health which oversees a Shelter + Care program for mentally

ill homeless; 4) a low-income housing and homeless developer; and 5) staff from the Housing Division. The State's CDBG Program shows support by providing funding to offset the costs of the rural continuum of care initiative. In northern and southern Nevada, many of the same types of agencies participate in the local continuum of care initiatives.

In 2016 it is anticipated that efforts to continue coordination between public and private housing providers and social services agencies will include the following actions:

- The Governor's Interagency Council on Homeless will continue with implementation of its Strategic Planning Goals and objectives. Working groups will include state, local and non-profit agencies from throughout Nevada. The mission of the Council will be to address homeless needs throughout Nevada;
- The continuation of the State of Nevada's Division of Public and Behavioral Health's CABHIS (Cooperative Agreements to Benefit Homeless Individuals for States) grant, which includes the implementation of the statewide plan to ensure sustained partnerships across public health and housing systems that will result in short- and long-term strategies to support individuals who experience chronic homelessness; and
- Statewide Continuum of Care meetings will continue to be held throughout the year. Topics of discussion will include implementation of a statewide strategic plan to end homelessness; implementation of statewide performance measures for CoC and ESG programs; statewide discharge planning; implementation of a statewide Homeless Management Information System Lead agency; and other issues that affect homelessness at a statewide level.

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APPENDICES

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APPENDIX A- CITIZEN PARTICIPATION PLAN

NEVADA CITIZEN PARTICIPATION PLAN

Consolidated Plan for Housing and Community Development

Introduction

In 1994, the US Department of Housing and Urban Development issued new rules consolidating the planning, application, reporting, and citizen participation processes of four formula grant programs: Community Development Block Grants (CDBG), Home Investment Partnerships (HOME), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons with AIDS (HOPWA). The new planning process was intended to more comprehensively fulfill three basic goals: to provide decent housing, to provide a suitable living environment and to expand economic opportunities.

Provision of decent housing may involve assisting homeless persons in obtaining appropriate housing, retaining the affordable housing stock, increasing the availability of permanent affordable housing for low income households without discrimination or increasing supportive housing to assist persons with special needs. Providing a suitable living environment might entail improving the safety and livability of neighborhoods, including the provision of adequate public facilities; deconcentrating of housing opportunities and revitalizing neighborhoods; restoring and preserving natural and physical features with historic, architectural, and aesthetic value; and conserving energy resources. Expanding economic opportunities can involve creation of accessible jobs, providing access to resources for community development, and assisting low income persons to achieve self-sufficiency.

The Consolidated Plan is a three-part planning process required by HUD. It comprises developing a five-year strategic plan, preparing annual action plans and submitting annual performance reports. These three parts are intended to furnish the framework whereby Nevada can identify its housing, homeless, community, and economic development needs, identify resources that will be tapped and actions to be taken to address the needs, as well as look back and evaluate the state's progress toward achieving its strategic goals. Completing these documents on time and in a manner that is acceptable to HUD ensures program funding.

The precursor to the Consolidated Plan is the Citizen Participation Plan (CPP). The objectives of the CPP are to ensure that the citizens of Nevada, particularly persons of low and moderate income, persons living in slum and blight areas, units of local government, housing agencies and other interested parties, are provided with the opportunity to participate in the planning and preparation of the Consolidated Plan, including amendments to the Consolidated Plan and the Annual Performance Report. In doing so, the CPP sets forth general policies and procedures for implementing and carrying out the consolidated planning process, such as how the Consolidated Plan will be developed, dates and milestones along which the process will proceed and methods for citizens to offer the state assistance and guidance in the formulation of the Plan. Furthermore, the provisions of the CPP fulfill statutory and regulatory requirements for citizen participation specified in the U.S. Department of Housing and Urban Development's rules for the Consolidated Plan, the HOME Investment Partnerships (HOME) Program, the Community Development Block Grant (CDBG)

Program, the Emergency Solutions Grants (ESG) Program, and the Housing Opportunities for Persons with AIDS (HOPWA) Program. In Nevada, the Division of Public and Behavioral Health administers HOPWA funding, and the Rural Community and Economic Development Division administers CDBG funds. The Governor's Office of Economic Development: Division of Rural community and Economic Development is the lead agency for overseeing the development of the consolidated, annual action plan and CAPER.

To ensure maximum participation in the Consolidated Plan process among all populations and needs groups, and to ensure that their issues and concerns are adequately addressed, the State of Nevada will follow the standards set forth in its adopted Citizen Participation Plan during development of its Consolidated Plan, Action Plan and Annual Performance Report.

The term "entitlement area" refers to cities and counties that, because of their size, can receive federal funding directly. These areas must complete a Consolidated Plan separately from the states to receive funding. For purposes of this report, non-entitlement refers to cities and towns that do not file Consolidated Plans individually and are not able to receive funding from the HUD programs directly. Entitlements not covered by the Nevada Consolidated Plan are Carson City, City of Henderson, City of Las Vegas, City of North Las Vegas, City of Reno, City of Sparks, and Clark County. Individuals wishing to contribute to the consolidated planning process in these areas should contact housing and community development specialists in these cities.

Encouraging Citizen Participation

The Consolidated Plan is designed to enumerate Nevada's overall strategy for coordinating federal and other housing and community development resources to provide decent housing, establish and maintain a suitable living environment, and expand economic opportunities, particularly for low and moderate-income persons.

Interested groups and individuals are encouraged to provide input into all aspects of Nevada's consolidated planning activities, from assessing needs to setting priorities through performance evaluation. By following the CPP, there will be numerous opportunities for citizens to contribute information, ideas and opinions about ways to improve our neighborhoods, promote housing affordability and enhance the delivery of public services to residents.

Limited English Proficient Persons and the Language Access Plan

The State of Nevada will make every effort to ensure that Limited English Proficient (LEP) persons have meaningful access to federally funded programs and services as is required under Title VI of the Civil Rights Act of 1964.

The State of Nevada has a diverse population where many languages are spoken. A substantial number of persons that speak these languages do not speak English or do not speak English very well and are considered Limited English Proficient (LEP).

Regardless of which language a person speaks or their ability to speak English, the State of Nevada

will make every effort to ensure that they have meaningful access to federal funding services through either oral interpretation or written translations of vital documents.

Since the State of Nevada has such many LEP persons, all countywide public notices and public hearings must ensure that language services are provided or available. For example, each year the public notice for the Annual Action Plan will be printed in various languages and translation services will be provided as necessary for the public hearing.

However, many programs and services delivered within the State of Nevada, including those carried out by participating cities, have distinct service areas and, as such, an assessment must be made by each agency administering the activity to determine which language services should be provided based on the identified LEP population in the service area.

To assist participating agencies, the State of Nevada has developed a bulletin instructing them to conduct the four-factor analysis and develop their own Language Access Plan (LAP) to ensure that LEP persons have meaningful access to their federally funded programs and services. The state will also provide technical assistance to assist the agencies in conducting the four-factor analysis and in developing their Language Access Plans.

The four-factor analysis is as follows:

Factor 1: Determine the number or proportion of LEP persons served or encountered in the eligible service area.

Factor 2: Determine the frequency with which LEP persons encounter the program.

Factor 3: Determine the importance of the information, services, program, or the activity to people's lives.

Factor 4: Assess costs versus resources and benefits in providing language services.

The State of Nevada is confident that no person will be denied federally funded services based on their ability to speak English.

The State of Nevada is committed to keeping all interested groups and individuals informed of each phase of the consolidated planning process and of activities being proposed or undertaken under HUD formula grant programs. Opportunities to comment on or participate in planning community development and affordable housing activities and projects will be publicized and disseminated throughout the state.

Public Hearings and Meetings

The State of Nevada will conduct a minimum of two public hearings to obtain citizens' views and to respond to proposals and questions. The hearings will take place at different stages of the consolidated planning process. At least one will occur prior to development of the Draft Plan and will be intended to solicit public input regarding distinct issues, thereby aiding policy formation. At least one hearing will occur after the Draft Plan has been released for public review, allowing interested parties an opportunity to review the strategies and how they were developed, designed and presented.

Information about the time, location and subject of each hearing will be provided to citizens at least 14 calendar days in advance through adopted public notice and outreach procedures. This notification will be disseminated to local governments and other interested parties. Public notification of the hearings will be published in statewide newspapers of general circulation in hearing location cities or towns and on the State of Nevada's websites. Staff may also attend other meetings and conventions in Nevada throughout the year, thereby providing an opportunity for additional public input on the Consolidated Plan.

Every effort will be made to ensure that public hearings are inclusive. Hearings will be held at convenient times and locations and in places where people most affected by proposed activities can attend. The State of Nevada will utilize hearing facilities that are accessible to persons with mobility impairments. If written notice is given at least seven days before a hearing date, the state will provide appropriate materials, equipment and interpreting services to facilitate the participation of non-English speaking persons and persons with visual and/or hearing impairments. Interpreters will be provided at public hearings where a significant number of non-English speaking residents can be reasonably expected to participate. All public hearings and public meetings associated with the consolidated planning process will conform to applicable Nevada open meetings laws.

However, the State of Nevada may, at its discretion, actively solicit input on housing and community development issues during the year with regional forums, town hall meetings and other venues, as they may present themselves.

Applicants must provide opportunities for public participation in the development of community development goals, objectives and applications for funding assistance by undertaking the following activities:

- Provide for and encourage citizen participation within their areas of jurisdiction with emphasis on participation by persons of low and moderate income
- Provide citizens with reasonable and timely access to local meetings, information, and records relating to proposed and actual use of funds
- Provide for technical assistance to groups and representatives of low and moderate-income persons that request assistance in developing proposals. The level and type of assistance is to be determined by the applicant
- Provide for public hearings to obtain citizen participation and respond to proposals and questions at all stages

Prior to selecting a project and applying for CDBG funding assistance, eligible applicants must conduct at least one public hearing for the following purposes:

- To advise citizens of the amount of CDBG funds expected to be made available for the current fiscal year
- To advise citizens of the range of activities that may be undertaken with CDBG funds
- To advise citizens of the estimated amount of CDBG funds proposed to be used for activities

that will meet the national objective to benefit low and moderate-income persons

- To advise citizens of the proposed CDBG activities likely to result in displacement and the unit of local government's anti-displacement and relocation plans
- To obtain recommendations from citizens regarding the community development and housing needs of the community
 - After considering all recommendations and input provided at the public hearing(s), the county commission or city/town/village council may select one or more projects for which to apply for funding assistance at an official public meeting
 - The applicant must conduct a second public hearing to review program performance, past use of funds and make available to the public its community development and housing needs including the needs of low and moderate-income families and the activities to be undertaken to meet such needs
 - Public hearing notices must be published in the non-legal section of newspapers or posted in a minimum of three prominent places within the project area with reasonable time and public access
 - Evidence of compliance with these regulations must be provided with each application, i.e. hearing notice, minutes of these meetings, list of needs, and activities to be undertaken
 - Amendments to goals, objectives, and applications are also subject to public participation
 - Provide for timely written answers to written complaints and grievances within 15 working days where practicable
 - Identify how needs of non-English speaking residents will be met in the case of public hearings where a significant number of residents can be reasonably expected to participate

Publication of Consolidated Plan Documents

The state will publish the draft Consolidated Plan or Annual Action Plan for public review in a manner that affords citizens, public agencies and other interested parties a reasonable opportunity to examine its contents and submit comments. The Draft Plan will be a complete document and shall include:

- The amount of assistance the state agencies expect to receive and,
- The range of activities that may be undertaken, including the estimated amount that will benefit persons of low and moderate income.

A notice for the release of the Draft Plan will be published in several newspapers of general circulation at the beginning of the public comment period. The release will include a list of the locations where copies of the entire proposed Consolidated Plan may be obtained or examined. The following are among the locations where copies of the public comment draft will be made available for inspection:

- Governor's Office of Economic Development offices,
- Rural Community & Economic Development Division website
- www.diversifynevada.com/programs-resources/rural-community-development

- NHD offices,
- NHD website <https://housing.nv.gov>

Citizens and groups may obtain a reasonable number of free copies of the proposed Consolidated Plan by contacting the Governor's Office of Economic Development: Rural Community & Economic Development Division at (775) 687-9900, or Nevada Housing Division at (775) 687-2040 or the document may be downloaded from the NHD website, located at <http://housing.nv.gov>

Public Comments on the Draft Consolidated Plan and Annual Action Plans

The Governor's Office of Economic Development: Division of Rural Community & Economic Development, as lead agency, will receive comments from citizens on its draft plan for a period not less than 30 days prior to submission of the Consolidated Plan or Annual Action Plans to HUD. The drafts will be scheduled for release in early fall of each year.

All comments or views of citizens received in writing during the 30-day comment period will be considered in preparing the final Consolidated Plan or Annual Action Plan. A summary of these comments or views and a summary of any comments or views not accepted and the reasons therefore shall be attached to the final Consolidated Plan or Annual Action Plan.

Public Notice and Outreach

An informed citizenry is critical to effective and responsive housing and community development programs. Efforts to educate residents and empower their participation are an ongoing element of the consolidated planning process.

As the fundamental means of notifying interested citizens about the Consolidated Plan and related activities, such as the Annual Action Plan or the Consolidated Annual Performance and Evaluation Report, the state will publish public notices in newspapers of general circulation in Nevada and on NHD web pages. Such notices will be published at least 14 calendar days prior to public hearings. All notices will be written in plain, simple language in English and Spanish and direct efforts will be undertaken to publish and/or post information at locations that will elicit maximum low and moderate income and minority participation.

Public education and outreach will be facilitated using public advertisements that describe the consolidated planning process, opportunities for citizen participation and available funding through the CDBG, ESG, HOME and HOPWA programs. The Consolidated Plan mailing list will likely include social service organizations, local jurisdictions, low income housing consumers, neighborhood groups, previous participants and commentators, and others expected to desire input on the Plan. This list is updated periodically and is available for inspection at the State of Nevada website.

Technical Assistance

Groups or individuals interested in obtaining technical assistance to develop project proposals or

applying for funding assistance through HUD formula grant programs covered by the Consolidated Plan or Annual Action Plan may contact the staff of the Governor's Office of Economic Development: Division of Rural Development. Issues regarding HOME and ESG may contact Nevada Housing Division, and for HOPWA may contact Nevada Division of Public and Behavioral Health. Such assistance may be of use to community development organizations, nonprofit service providers, and for-profit and nonprofit housing development groups that serve or represent persons of low and moderate income. Pre-application workshops offer basic program information and materials to potential project sponsors, and staff provides in-depth guidance and assistance to applicants and program participants on an ongoing basis. Emphasis is placed on capacity development of community-based organizations.

Amendments to the Consolidated Plan

An amendment to the Consolidated Plan is required whenever the jurisdiction determines to:

- Substantially change the allocation priorities or its method of distributing HUD formula grant funds;
- Utilize formula grant funds (including program income) to carry out an activity not previously described in the Action Plan; or
- Change the purpose, scope, location or beneficiaries of an activity.

Such changes, prior to their implementation, are reviewed under various federal or local requirements, particularly rules on procurement and/or policies on the allocation of public resources. Substantial amendments to the Consolidated Plan are, in addition, subject to a formal citizen participation process. Notice and the opportunity to comment will be given to citizens through public notices in local newspapers and other appropriate means, such as direct mail or public meetings. A public comment period of not less than 30 days will be provided prior to implementing any substantial amendment to the Consolidated Plan. Staff will prepare a summary of all comments received in writing and, in cases where any citizens' views are not accepted, provide reasons for the decision. This documentation will be attached to the substantial amendment, which will be available to the public and submitted to HUD.

Substantial Amendments

Occasionally, public comments warrant an amendment to the Consolidated Plan. The criteria for whether to amend are referred to by HUD as Substantial Amendment Criteria. The following conditions are Substantial Amendment Criteria:

- Any change in the described method of distributing funds to local governments or nonprofit organizations to carry out activities. Elements of a method of distribution are:
- Application process,
- Allocation among funding activities more than 35 percent of the total current entitlement allocation,
- Grant size limits, and

- Criteria selection.

An administrative decision to reallocate all the funds allocated to an activity in the Action Plan to other activities of equal or lesser priority need level, unless the decision is a result of:

- Federal government recession of appropriated funds, or appropriations are so much less than anticipated that the state makes an administrative decision not to fund one or more activities, or
- The governor declares a state of emergency and reallocates federal funds to address the emergency, or
- A unique economic development opportunity arises where the state administration asks that federal grants be used to take advantage of the opportunity.

Citizen Participation in the Event of a Substantial Amendment

In the event of a substantial amendment to the Consolidated Plan, the Rural Community & Economic Development Division, depending on the nature of the amendment, will conduct at least one additional public hearing. This hearing will follow a comment period of no less than 30 days, where the proposed substantially amended Consolidated Plan will be made available to interested parties. Citizens will be informed of the public hearing through newspaper notification and the state websites prior to the hearing and the notice will appear in at least one newspaper that is circulated statewide.

Citizens will be notified of the substantially amended Consolidated Plan's availability through newspaper notification prior to the 30-day comment period. The substantially amended sections of the Consolidated Plan will be available on the NHD website, <http://housing.nv.gov> for the full public comment period.

Consideration of Public Comments on the Substantially Amended Plan

In the event of substantial amendments to the Consolidated Plan, the state will openly consider any comments on the substantially amended Consolidated Plan from individuals or groups. Comments must be received in writing or at public hearings. A summary of the written and public hearing comments on the substantial amendments will be included in the final Consolidated Plan. The final Consolidated Plan will also include a summary of all comments not accepted and their reasons for dismissal.

Changes in Federal Funding Level

Any changes in federal funding level after the Consolidated Plan's draft comment period has expired and the resulting effect on the distribution of funds will not be considered an amendment or a substantial amendment.

Standard Amendments

Standard amendments are those that are not considered substantial in nature and pertain chiefly to minor administrative modifications of the programs. Thus, they do not require in-depth citizen

participation.

Annual Performance Reports

Performance reports on CDBG, HOME, ESG and HOPWA programs covered by the Consolidated Plan or Annual Action Plan are to be prepared by the Rural Community & Economic Development Division, Nevada Housing Division, and the Department of Health and Human Services for annual submission to HUD within 90 days of the start of each program year. Draft performance reports will be made available upon written request. The draft performance report will be available for comment for no less than 15 days, and any public comments received in writing will be reported in an addendum to the final performance report.

Access to Records

To the extent allowed by law, interested citizens and organizations shall be afforded reasonable and timely access to records covering the preparation of the Consolidated Plan or Annual Action Plan, project evaluation and selection, HUD's comments on the Plan and annual performance reports. In addition, materials on formula grant programs covered by the Consolidated Plan or Annual Action Plan, including activities undertaken in the previous five years, will be made available to any member of the public who requests information. A complete file of citizen comments will also be available for review by interested parties. After receiving notice of HUD's approval of its Consolidated Plan or Annual Action Plan, the Rural Community & Economic Development Division will inform those on its mailing list of the availability of the final Plan document and of any HUD comments on the Plan.

Complaints and Grievances

Citizens, administering agencies and other interested parties may submit complaints and grievances regarding the programs the Rural Community & Economic Development Division, Department of Health and Human Services, and the Nevada Housing Division administer. Complaints should be in writing, specific in their subject matter, and include facts to support allegations. The following are considered to constitute complaints to which a response is due:

- The administering agency has purportedly violated a provision of the Citizen Participation Plan;
- The administering agency has purportedly violated a provision of federal CDBG, ESG or HOME, or HOPWA program regulations;
- The administering agency, or any of its contractors, has purportedly engaged in questionable practices resulting in waste, fraud or mismanagement of any program funds.

Residents may also present complaints and grievances orally or in writing at the community meetings and/or public hearing. All public comments, including complaints and grievances, made either orally or in writing within the 30-day public comment period, will be included in the final Consolidated Plan or Annual Action Plan. Such complaints or grievances for CDBG, HOME, HOPWA, or ESG shall be directed to the Consolidated Plan representative at the Rural Community & Economic Development

Division and Nevada Housing Division.

Timely Response to Complaints or Grievances

Upon receipt of a written complaint, the designated representative at Rural Community & Economic Development Division or Nevada Housing Division shall respond to the complainant within 15 calendar days and maintain a copy of all related correspondence, which will be subject to review.

Within 15 calendar days of receiving the complaint, the designated representative shall discuss the matter with the department manager and respond to the complaint in writing. A copy of the Rural Community & Economic Development or Nevada Housing Division response will be submitted concurrently to the complainant and to the division directors. If, due to unusual circumstances, the designated representative finds that s/he is unable to make the prescribed time limit, the limit may be extended by written notice to the complainant, the designated representative's notice must include the reason for the extension and the date on which a response is expected to be generated, which may be based on the nature and complexity of the complaint.

Public review materials and performance reports will include data, as appropriate under confidentiality regulations, on any written complaints received and how each was resolved.

Activities Exempt from Substantial Amendment Citizen Participation Requirements

Urgent Needs

It may be necessary to amend the Consolidated Plan or Annual Action Plan in the event of an emergency such as a natural disaster. These amendments may include funding new activities and/or the reprogramming of funds including canceling activities to meet community development needs that have an urgency. Therefore, the State of Nevada may utilize its HOME or CDBG funds to meet an urgent need without the normal public comment period, which is otherwise required for substantial amendments.

To comply with the national objective of meeting community development needs having an urgency, an activity will alleviate existing conditions that the State of Nevada certifies:

- Pose a serious and immediate threat to the health and welfare of the community;
- Are of recent origin or recently became urgent;
- The local jurisdiction is unable to finance the activity on its own; or
- Other resources of funding are not available to carry out the activity.

A condition will generally be of recent origin if it is developed or became critical within 18 months preceding the Rural Community & Economic Development Division's certification.

Availability of the Citizen Participation Plan (CPP)

Copies of the CPP may be obtained from Nevada Governor's Office of Economic Development's

website at www.diversifynevada.com or from Nevada Housing Division's website at <http://housing.nv.gov/>. Upon request, the Rural Community & Economic Development Division or NHD will make the Plan available in an alternative format accessible to persons with disabilities.

APPENDIX B

CDBG Grants, 2018: Proposed Use of Funds, National Objectives & Beneficiaries

Beneficiaries			Community & Funding Category		HUD Nat. Obj.	CDBG Allocation	% of Total	
Benef.	LMI	%	Public Facilities:					
935	630	67.38	Caliente	Caliente Depot Historic Restoration	LMI-A	\$1,600,000.00		
4,646	3,354	72.19	Fernley	Downtown Revitalization, Ph. 3 – Main St. Beautification	LMI-S	\$218,625.00		
4,646	3,354	72.19	Fernley	Fernley Depot Design & Sewer Project, Phase II	LMI-S	\$300,907.00		
4,685	2,845	60.73	West Wendover	Downtown Development, Phase I	LMI-A	\$525,000.00		
200	150	75.00	Esmeralda Co.	Historical Goldfield Street Repair	LMI-S	\$196,300.00		
1,435	1,010	70.38	Nye County	Beatty Airport Redevelopment, Ph. I – Fueling Station	LMI-A	\$390,000.00		
2,358	1,353	57.38	Carson City	College Parkway ADA Ramps	LMI-C	\$268,892.00		
187	187	100.0	Carson City	Long Ranch Handicapped Ramp Replacements	LMI-C	\$198,070.00		
19,092	12,883	67.48	PUBLIC FACILITIES TOTAL				\$3,697,794.00	74.41
Benef.	LMI	%	Public Services:					
140	140	100.0	Carson City	Food for Thought: Summer Lunch Program	LMI-C	\$12,000.00		
300	300	100.0	Carson City	Ron Woods: Reach Up	LMI-C	\$50,000.00		
120	120	100.0	Carson City	St. Vincent DePaul	LMI-C	\$6,000.00		
560	560	100.0	PUBLIC SERVICES TOTAL				\$68,000.00	1.37
Benef.	LMI	%	Planning:					
4,646	3,354	72.19	Fernley	Fernley Depot Comm. Center, Ph. 3 – Outreach & Design	LMI-S	\$80,000.00		
36,110	18,455	51.11	Nye County	Pahrump Fairgrounds Drainage Sty. & Flood Control Des.	LMI-A	\$124,000.00		
40,756	21,808	53.51	PLANNING TOTAL				\$204,000.00	4.10

Benef.	LMI	%	Acquisition
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1,063	652	61.34	Wells	RDA Land Acquisition	LMI-S	\$800,000.00	
1,063	652	61.34	ACQUISITION TOTAL			\$800,000.00	16.10
Benef.	LMI	%	Slum & Blight				
S/B	S/B	S/B	White Pine Co.	Slum/Blight Property Abatement	S/B	\$200,000.00	
			SLUM/BLIGHT TOTAL			\$200,000.00	4.02
20,426	13,287	65.05	CDBG TOTAL			\$4,969,794.00	100.0

APPENDIX C

State of Nevada



**State Emergency Solutions Grant
Programs for Rural Nevada**

& Rural Nevada Continuum of Care

Written Standards

Developed for Housing and Services funded through McKinney-Vento Homeless Assistance Programs

Version 1.1 – 04/01/2015



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INTRODUCTION

The State of Nevada Housing Division (NHD) and the Rural Nevada Continuum of Care (RNCoC) has developed the following standards for providing assistance using McKinney-Vento Homeless Assistance funds. Included is the Emergency Solutions Grant (ESG) program, and programs funded through the RNCoC. These standards were created in coordination with the ESG Program Manager, the RNCoC Steering Committee, CoC recipients and ESG sub-recipients. They are in accordance with the interim rule for the Emergency Solutions Grant Program released by the U.S. Department of Housing and Urban Development (HUD) on December 4, 2011, and the final rule for the definition of homelessness also released by the HUD on December 4, 2011; and the Continuum of Care Program Interim Rule released by HUD on July 31, 2012.

The NHD and RNCoC expects that the standards will adjust as programs evolves, members gain more experience, and HMIS data from programs and services is analyzed. The Standards may serve as the guiding principles for funding ESG and RNCoC programs.

Each recipient and sub-recipient shall comply with the minimum written standards for providing assistance established by NHD and RNCoC. All funds used to provide services to clients served by these programs, including any match and program income funding, shall comply with these same requirements.

Each recipient and sub-recipient may decide to set standards on their provision of assistance that exceeds these minimum standards, but will at the very least comply with the following guidelines.

1. COORDINATED INTAKE AND REFERRAL SYSTEM

The RNCOC has encouraged counties and towns to develop a localized coordinated intake, assessment and referral system. Services targeted to persons experiencing homelessness are delivered by homeless service providers throughout the rural area. Agencies participate in the local assessment effort, which ensures homeless persons, including chronically homeless individuals and families, families with children, veterans and their families, and any unaccompanied youth, are referred to available resources. Many of these agencies participate in the RNCOC, which governs service provisions and standards.

To address the needs of the homeless in rural Nevada, intake agencies shall utilize the Vulnerability Index & Service Prioritization Decision Assistance Tool * (VI-SPDAT) provided by the RNCOC to prioritize people who are considered high priority for housing and services. The Nevada Rural Housing Authority (NRHA) and other housing providers will allocate housing vouchers to persons who score highest in the VI-SPDAT until a Section 8 Housing Choice Voucher or other permanent housing program is made available. Households receiving assistance are case managed by county social services agencies and other homeless providers to ensure long-term stability. Many agencies utilize ESG and other funding sources to pay for case management and other housing stabilizations services.

All other homeless and at-risk of homelessness persons who do not score high enough to receive vouchers from NRHA or other providers at the intake agency will be referred to local agencies with programs and services that best meet the needs of the household. Providers shall develop and implement screening tools for programs served that will ensure the most vulnerable clients are served first if one isn't provide by the RNCOC.

All RNCOC recipients and ESG sub-recipients, except for victim service providers, are required to participate in the coordinate assessment and referral system. * See Exhibit E

2. COMMUNITY MANAGEMENT INFORMATION SYSTEM (FORMERLY HMIS)

RNCOC recipients and ESG sub-recipients, except for victim service providers, must utilize the statewide Community Management Information System (CMIS) database designated by the continuum of care. This database is designated to record and store client-level data, including the characteristic and service needs of the homeless and at-risk of homelessness communities. Utilization of the CMIS database will help provide a consistent and accurate snapshot of populations served through various programs.

Agencies utilizing the CMIS database are expected to comply with data quality standards. Information shall be entered into the database in a timely manner, and shall be updated to provide exit information, income data, and shall have limited number of fields with "Don't Know", "Refused" or "Missing". **Note:**

Rapid re-housing client employment data may be entered annually at recertification, however non-cash and other cash income sources should be updated as received.

Emergency shelters may utilize the “auto-exit” feature available through CMIS which will automatically exit a client that has not had a **service** provided within a select period of time after accessing a shelter bed, however all data fields will reflect “Data Not Collected” which may impact the overall data quality for the RNCoC and ESG programs. Emergency shelters must make every effort to implement procedures which will ensure clients are formally exited, but may utilize this feature if the volume of clients exiting **services** becomes unmanageable. ***This feature will not be allowed for persons being housed in shelter beds; only persons accessing services after they have exited the shelter, or non-shelter clients may be exited in this manner.***

Note: Victim service providers shall actively utilize the CMIS comparable database system designated by the RNCoC and ESG program administrators, and shall comply with the data quality standards set forth by the RNCoC and ESG programs.

3. PERSONNEL REQUIREMENTS

RNCoC recipients and ESG sub-recipients shall make certain that programs targeted to homeless and at-risk of homelessness populations are adequately staffed by qualified personnel to ensure quality service delivery, effective program management, and the safety of program participants.

At a minimum, agencies shall ensure the following standards are in place for programs funded through RNCoC and ESG grants;

- a. Agencies shall select, for its service personnel, only those employees and/or volunteers with appropriate knowledge, or experience, for working with individuals and families experiencing homelessness.
- b. Agencies shall have a written plan for, and provide training to, all paid and volunteer staff in both the policies and procedures employed by the program, and in specific skill areas as determined by the program.
- c. All paid and volunteer service personnel shall participate in ongoing internal and/or external training, which will further enhance their knowledge and ability to work with individuals and families experiencing homelessness.
- d. For programs that use CMIS, all users must abide by the standard operating procedures found in the CMIS/HMIS Policies and Procedures manual provided by the HMIS Lead Agency. Additionally, user must adhere to privacy and confidentiality terms set forth in the User Agreement.
- e. Agency personnel with the responsibility for supervision of the casework counseling, and/or case management components have, at a minimum, a Bachelor’s degree in a human service-related field and/or experience working with individuals and families experiencing homelessness, poverty, disabilities, or other similar challenges.

If the agency is located in a community without access to personnel with at least a Bachelor's degree in a human service-related field and/or having the required experience, the agency must include strategies to ensure caseworkers have access to training that will provide housing and case management skills needed for the long-term success of clients served by these programs.

- f. All personnel shall have a written job description that at a minimum addresses the major tasks to be performed and the qualifications required for the position.
- g. The program shall ensure all paid and volunteer service personnel are familiar with HUD's Fair Housing and Equal Opportunity requirements under 24 CFR 5.105(a); and the new "Equal Access Rule (77 FR 5662).
- h. Supervisors shall ensure quality/coordinated services.

4. COORDINATION WITH MAINSTREAM AND TARGETED HOMELESS PROVIDERS

NHD and the RNCOC expects providers receiving funds through ESG and RNCOC programs to maximize the use of available Federal, State and local mainstream resources to ensure the long-term stability of program participants. Providers shall actively seek to engage in partnerships with programs and services that are targeted to address homelessness and poverty within their communities.

5. EDUCATIONAL ASSURANCES

NHD and the RNCOC expects providers to collaborate with local education authorities to assist in the identification of individuals and families who become or remain homeless and are informed of the eligibility for services under subtitle B of the title VII of the Act. This includes demonstrating that providers establish policies to ensure all children are enrolled in early childhood programs or in school and connected to appropriate services in the community. Providers shall collaborate with local school districts and early childhood education providers to identify homeless households with children to ensure they understand their eligibility for educational services.

6. PREVENTING INVOLUNTARY FAMILY SEPARATION

Maintaining family unity is important when homeless households with children under the age of 18 enter homeless shelters or housing. NHD and RNCOC expects providers to ensure homeless households with children under the age of 18 are not denied admission and are not separated.

7. AFFORDABLE CARE ACT

NHD and the RNCOC expects providers to include enrollment and outreach activities to ensure households have access to healthcare options, including Medicaid.

8. TIMELINESS OF EXPENDITURES

Once activities begin, the ESG sub-recipient or RNCOC recipient must draw down funds at least once per quarter, and make every effort to ensure all grant funds are expended by grant close-out. ESG sub-recipients who are not on target to expend all funds by the deadline may be at risk of grant recapture by the NHD.

ESG sub-recipient's new grant year begins July 1st of each fiscal year, and expenditures may be reimbursed for expenses that occur after July 1st for each grant awarded. Each grant term has a term of 24 months.

For RNCOC recipients, the Operating Start Date (OSD) indicates when the term of the grant begins, that is, when the project begins to serve homeless persons, and sets the beginning of the 12-month program year for spending and reporting. For non-construction projects, the OSD is determined as the first day of the month in which the recipient begins incurring eligible operating, supportive service, leasing or rental assistance. New projects with acquisition/rehabilitation/construction costs, the OSD is the earlier of the first day of the month following purchase of the property or completion of construction activities (the date the recipient receives the Certificate of Occupancy) *or* the date the NOFA established as the deadline to begin operating the project. For renewal projects, the OSD and the grant term begin the day after the end of the previous grant term.

9. PERFORMANCE STANDARDS

NHD and the RNCOC expects providers to design programs which will address the needs of the homeless and at-risk of homelessness populations, with the end result of reducing and ending homelessness. NHD and the RNCOC will evaluate performance* of each provider based on outcomes achieved. Outcomes are outlined and updated in the Performance Standards adopted by the RNCOC Steering Committee. These outcome measures will be used to evaluate program success annually. NHD and RNCOC will use this and other performance metrics to guide funding decisions for ESG and CoC-funded programs.

* See Attachment C

ESG PROGRAM ONLY-WRITTEN STANDARDS MINIMUM REQUIREMENTS

Minimum standards for all programs:

1. PARTICIPANT ELIGIBILITY:

Minimum standards for evaluating individual and family eligibility for assistance under the ESG program are:

a. Street Outreach:

People who qualify as "literally homeless" based on Category (1)(i)* of the "homeless" definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): *engagement, case management, emergency health and mental health services, transportation*. Program participant files must include documentation that verifies homeless status. * See Exhibit A, Exhibit C and Exhibit D

- b. **Emergency Shelter: Note:** *Only those shelters funded under FY 2010 Emergency Shelter Grant Program as an emergency shelter may continue to be funded under the Emergency Solutions Grant Program.*

People who qualify as “homeless” based on Category 1,2,3, or 4* of the homeless definition found at 24 CFR 576.2 are eligible for the following: *shelter, case management, child care, education, employment and life skills services, legal services, health and mental health services, substance abuse services, transportation.* Program participant files must include documentation that verifies homeless status. **NOT ALLOWABLE: Mortgage and mortgage arrearage payments.**

* See Exhibit, Exhibit C and Exhibit D

- c. **Transitional Housing for the Homeless: Note:** *Only transitional housing for homeless programs funded under FY 2010 Emergency Shelter Grant Program and met the criteria under the former emergency shelter definition (“any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless”) may continue to be funded under the Emergency Solutions Grant Program.*

People who qualify as “homeless” based on Category 1 or 4* of the “homeless” definition found at 24 CFR 576.2 are eligible for the following: *housing, case management, child care, education, employment and life skills services, legal services, health and mental health services, substance abuse services, transportation.* Program participant files must include documentation that verifies homeless status. * See Exhibit A and Exhibit D

- d. **Rapid Re-Housing:**

People who qualify as “homeless” based on Category 1 or 4* of the “homeless” definition found at 24 CFR 576.2 and who are moving into a housing unit that meets HUD’s habitability and lead-based paint standards are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.104, 576.105, 576.106) Program participant files must include documentation that verifies homeless status * See Exhibit A, Exhibit C, and Exhibit D

- a. Housing Relocation and Stabilization Services: moving costs, rent application fees, security deposits, last month’s rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management
- b. Rental assistance: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.

NOT ALLOWABLE: Mortgage and mortgage arrearage payments

e. Homelessness Prevention:

People who qualify for “at risk of homelessness” based on Category 2,3,or 4* of the “homeless” definition or based on the “At risk of homelessness” definition found at 24 CFR 576.2 and who resides in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for the following services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106) * See Exhibit A, Exhibit B, Exhibit C, and Exhibit D

- a. Housing Relocation and Stabilization Services: moving costs, rent application fees, security deposits, last month’s rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management
- b. Rental Assistance: short-term (up to 3 months) and medium-term (4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant’s portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord.

NOT ALLOWABLE: Mortgage and mortgage arrearage payments.

2. PROGRAM COORDINATION

Minimum standards for program coordination consist of on-going system and program coordination and integration of ESG-funded activities to the maximum extent practicable with the following:

- a. Emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers;
- b. Other homeless assistance providers, including:
 - Shelter Plus Care Program
 - Supportive Housing Program
 - Section 8 Moderate Rehab program for Single Room Occupancy Program (SRO) for Homeless Individuals
 - HUD-Veterans Affairs Supportive Housing (HUD-VASH)
 - Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act)
 - Grants for the Benefit of Homeless Individuals
 - Healthcare for the Homeless
 - Programs for Runaway and Homeless Youth
 - Projects for the Assistance in the Transition from Homelessness
 - Services in Supportive Housing Grants
 - Emergency Food and Shelter Program

- Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Programs
 - Homeless Veterans Reintegration Program
 - Domiciliary Care for Homeless Veterans Program
 - VA Homeless Providers Grant and Per Diem Program
 - Health Care for Homeless Veterans Program
 - Homeless Veterans Dental Program
 - Supportive Services for Veterans Families Programs, and
 - Veterans Justice Outreach Initiative
 - Cooperative Agreements to Benefit Homeless Individuals (CABHI) Grant
- c. Mainstream service and housing providers**
- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937
 - Housing programs receiving Section 8 tenant-based or project-based assistance
 - Supportive Housing for Persons with Disabilities
 - HOME Investment Partnership Program
 - Temporary Assistance for Needy Families
 - Health Center Program
 - State Children’s Health Insurance Program
 - Head Start
 - Mental Health and Substance Abuse Block Grants
 - Services funded under Workforce Investment Act; and
 - Other state programs
- d. Continuum of Care (CoC) Networks**
- RNCOC meetings
 - Community Coalition meetings
 - Local discharge planning initiatives
 - Various other committees, task forces and workgroups

3. INCOME DETERMINATION

Minimum standards for determination of an individual or family’s annual income consist of calculating income in compliance with 24 CFR 5.609. Annual income is defined as:

- a. Annual income** means all amounts, monetary or not, which:
- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
 - Are anticipated to be received from a source outside the family during the 12-month period following admission or annual reexamination effective date; and
 - Which are not specifically excluded as defined under paragraph (C) of 24 CFR 5.60.
 - Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access

ESG Program providers should refer to the ESG Program's Policies and Procedures Manual and ESG Program Guidelines manual for more details.

4. CONNECTION WITH OTHER RESOURCES

Minimum standards for connection with other resources consist of assisting each participant to obtain, if applicable:

- a. Appropriate support services including:
 - Permanent housing
 - Medical health treatment
 - Mental health treatment
 - Counseling
 - Supervision; and
 - Other services needed for independent living.
- b. Other governmental and private assistance available to help with housing stability including:
 - Medicaid
 - Supplemental Nutrition Assistance Program
 - Women, Infants and Children (WIC)
 - Federal-State Unemployment Insurance Program
 - Social Security Disability Insurance (SSDI)
 - Child and Adult Care Food Program; and
 - Other available assistance.

5. TERMINATION OF ASSISTANCE

At all times providers must follow Termination and Grievance Policies set forth by the agency and NHD. At a minimum, standards for termination of assistance are:

- a. **In general:**

If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases.
- b. **Program participants receiving rental assistance or housing relocation or stabilization services:**

When terminating rental assistance or housing relocation and stabilization services, the required formal process shall minimally consist of:

 - Written notice clearly stating the reasons for termination;
 - Review of the decision that gives the participant opportunity to present objections to the decision maker; and
 - Prompt written final notice.
- c. **Ability to provide further assistance:**

Termination will not bar the provider from providing later additional assistance to the same family or individual.

6. LEAD-BASED PAINT

Minimum standards for all shelters and program participant-occupied housing consist of compliance with the lead-based remediation and disclosure requirements identified in 24 CFR 576.403, including the Lead-Based Paint Poisoning Prevention Act (42 USC 4821-4846), the Residential Lead Based Paint Hazard Reduction Act of 1992 (42 USC 4851-4856) and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R. Refer to ESG Program Policies and Procedures Manual and ESG Program Guidelines for further guidance.

7. SAFETY, SANITATION & PRIVACY

Minimum standards for all shelters and program participant-occupied housing consist of compliance with safety, sanitation and privacy requirements identified in 24 CFR 576.403. Refer to the ESG Program's Policies and Procedures Manual, and ESG Program Guidelines for detail instructions.

- a. **Additional requirements for permanent housing:** Providers shall not use ESG funding to help someone remain or move into housing if the housing does not meet minimum habitability standards. For new move-ins, inspections must occur prior to execution of a landlord/provider agreement and landlord/tenant lease. If a program participant is expected to eventually access subsidized housing, such as the Section 8 Housing Voucher Program, the provider should make certain the housing unit meets any additional health and safety requirements of that program.

8. CONFLICTS OF INTEREST

Minimum standards for conflicts of interest are:

- a. **Organizational conflict of interest:**
 - ESG assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent.
 - No provider, with respect to individuals or families occupying housing owned by the provider or a provider's subsidiary or parent, will carry out the initial evaluation under 24 CFR 576.401 or administer homelessness prevention assistance under 24 CFR 576.103.
- b. **Individual conflicts of interest:**
 - When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government).
- c. **All transactions/activities:**
 - Conflicts prohibited – No persons involved with the ESG program or who is in a position to participate in a decision-making process or gain inside information regarding the program activities, shall obtain a financial interest or benefit from an assisted activity; or have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds (either himself or herself or those with whom he or she has family or business ties) during his or her tenure or for one year following tenure.

- Persons covered – These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the provider’s agency.
- Exceptions – A provider may request an exception to these provisions from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404.

9. HOMELESS PARTICIPATION

Minimum standards for homeless participation are:

- To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work on the ESG-funded facilities, in providing services under ESG and in providing services for occupants of the ESG-funded facilities (24 CFR 576.405)

10. FAITH-BASED ACTIVITIES

Minimum standards for faith-based activities (24 CFR 576.406) are:

- Providers receiving ESG funding shall not engage in inherently religious activities as part of the ESG-funded programs or services. Such activities must be offered separately from ESG-funded programs and services and participation must be voluntary.
- A religious organization receiving ESG funding retains independence from government and may continue with its mission provided that ESG funds are not used to support inherently religious activities. An ESG-funded organization retains its authority over its internal governance.
- An organization receiving ESG funding shall not discriminate against a participant or prospective participant based on religion or religious beliefs.
- ESG funding shall not be used for rehabilitation of structures used specifically for religious activities, but may be used for rehabilitating structures that are used for ESG-eligible activities.

11. NONDISCRIMINATION/EQUAL OPPORTUNITY/AFFIRMATIVE ACTION

Minimum standards shall comply with the requirements for nondiscrimination equal opportunity and affirmative outreach identified in 576.407 (a-b). In addition, providers receiving ESG funding shall follow HUD’s “*Equal Access to Housing in HUD Programs, Regardless of Sexual Orientation or Gender Identity*” final rule, published on February 3, 2015. Provider’s shall train program staff and contractors so as to ensure that employees and contractors who interact directly with potential clients and current clients are aware of this rule and take prompt corrective action to address any noncompliance. Refer to CPD Notice 15-02 for further guidance.

12. PROGRAM INCOME

Minimum standards for program income earned during the project period are that program income shall be retained and used to finance the non-Federal share of the project or program. Records of the receipt and use of program income shall be retained.

13. RECOVERED MATERIALS

Minimum standards for the procurement of recovered materials shall comply with the requirements identified in 57 CFR part 576.407(f), including that the recipient and its contractors must comply with Section 6002 of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act. The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at 40 CFR part 247 that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resources recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

14. DISPLACEMENT

Minimum standards for minimizing the displacement of persons (families, individuals, business, nonprofit organizations, and farms) as a result of a project assisted under ESG shall comply with 24 CFR part 576.408 and consist of:

a. Minimizing displacement:

Consistent with ESG goals and objectives, the providers shall minimize displacing people as a result of ESG-funded projects.

b. Temporary relocation not permitted:

No temporary relocation shall be required for an ESG-funded project. When a tenant has to move for an ESG-funded project, the tenant shall be treated as permanently displaced and offered relocation assistance and payments.

c. Relocation assistance for displaced persons:

In general, a displaced person shall be provided relocation assistance and advised of his or her Fair Housing Rights. A *Displaced Person* is defined as any person that moves from a permanent home as a result of ESG-funded acquisition, rehabilitation, or demolition of a project.

d. A person does not qualify as a “displaced persons” if the person:

- Was evicted based on a violation of the lease or occupancy agreement; violation of the law; and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
- Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a “displaced persons”.
- The person is ineligible under 49 CFR 24.2
- HUD determines that the persons was not displaced as a result of the project.

The State or the provider may request that HUD determine whether or not a displacement would be covered by this rule.

e. Real property acquisition requirements:

The acquisition of real property for an ESG funded project is subject to the URA and Federal government wide regulations.

f. Appeals:

A person who disagrees with NHD's determination concerning whether the persons qualifies as a displaced persons, or the amount of relocation assistance, may file a written appeal. A low-income persons who disagrees with NHD's determination may submit a written request for review of that determination by HUD.

15. RECORDS & RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow NHD and HUD to determine whether ESG requirements are being met, and if they comply with 24 CFR 576.500.

Program participant records shall include written:

- a. Determination and verification/certification that the program participant met the criteria for being Homeless or At-Risk of Homelessness, and that an effort was made to obtain written third-party verifications, when possible and applicable. See Exhibit D;
- b. Determination and verification/certification that the program participant was eligible or ineligible for the particular services and/or financial assistance;
- c. Determination and verification/certification that the program participant lacked sufficient resources and support networks to provide the assistance;
- d. Determination and verification/certification that the program participant met income requirements and that an effort was made to obtain written third-party verifications, when possible and applicable;
- e. Identification of the specific services and financial assistance amounts that were provided to the program participant;
- f. When applicable, verification that the services were terminated in compliance with 24 CFR 576.402;
- g. When adopted by the Continuum of Care, a copy of the CoC-approved centralized or coordinated assessment of the program participant;
- h. Copies of leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with the fair market rent, rent reasonableness, and utility allowance requirements;
- i. Determination and verification that at a minimum, the housing unit met HUD's habitability and lead-based paint standards;
- j. Copy of individualized housing stability plan;
- k. Notes verifying case management services were provided at least monthly;
- l. Notes verifying program participants' eligibility was re-evaluated at least every 3 months for homeless prevention services or at least annually for rapid re-housing services.
- m. Notes verifying program participant was assisted to obtain mainstream and other resources

Program policies and procedures shall indicate:

- a. Services are coordinated with the Continuum of Care, other homeless assistance/prevention programs and mainstream service and assistance programs;
- b. Compliance with HUD's ESG (24 CFR 576) requirements for:
 - Shelter and housing standards
 - Conflict of interest
 - Homeless participation
 - Faith-based activity
 - Nondiscrimination, equal opportunity, affirmative outreach, and compliance with HUD's transgender policies
 - Uniform administrative rules (24 CFR part 84)
 - Lobbying and disclosure (24 CFR part 87)
 - Displacement, relocation and acquisition
 - Procurement (24 CFR 84.40-84-48)
- c. Program participant records are kept secure and confidential
- d. Participation in CMIS or comparable database selected by the Continuum of Care or NHD, including timeliness of data entry and data quality expectations.

Financial records shall include:

- a. Supporting documentation for all costs charged to ESG grant, including evidence that rent checks are paid to the property owner
- b. Documentation showing ESG funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
- c. Documentation of appropriate and sufficient match including evidence of all match sources obtained, and documentation of expenditures of cash match for eligible grant expenses.
- d. Evidence that expenditures did not occur outside of the grant term
- e. Documentation regarding salary expenditures for grant-related activities
- f. Documentation of the receipt and use of program income
- g. Copies of procurement contracts

STREET OUTREACH, EMERGENCY SHELTER, & TRANSITIONAL FACILITIES MINIMUM STANDARDS

1. STREET OUTREACH MINIMUM STANDARDS

a. Targeting/Engagement

Providers of Street Outreach services shall target unsheltered homeless individuals and families, meaning those with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground.

b. Assessment/Service Provision/Referral/Prioritization

- Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered the following Street Outreach services, as needed and appropriate: *engagement, case management, emergency health and mental health, transportation services*
- When appropriate based on the individual's needs and wishes, the referral to permanent supportive housing or rapid re-housing can quickly assist the individuals to obtain safe, permanent housing shall be prioritized over the provision of or referral to an emergency shelter.

2. EMERGENCY SHELTER MINIMUM STANDARDS

An emergency shelter means 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 does not require occupants to sign leases or occupancy agreements. ***Only projects funded as an emergency shelter under the Fiscal Year 2010 Emergency Shelter Grant program may continue to be funded under the Emergency Solutions Grant program.*** The following minimum standards shall be required of any emergency shelter funded through the Emergency Solutions Grant program:

a. Admission:

Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of "homeless" as specified in 24 CFR 573.2 (1, 2, 3, & 4) and agency's eligibility criteria.

b. Assessment:

Individuals and families shall be offered an initial need and eligibility assessment and qualifying program participants, including those meeting special population criteria, will be offered emergency shelter services, as needed, available, and appropriate.

c. Prioritization/Diversion/Referral:

When appropriate based on the individual's needs and wishes, the provision of or referral to Homeless Prevention or Rapid Re-Housing services, or other available housing programs offered through the Continuum of Care that can quickly assist individuals to maintain or obtain safe, permanent housing, shall be prioritized over the provision of Emergency Shelter services.

d. Reassessment:

Program participants will be reassessed as case management progresses, based on the individual service provider's policies.

e. Discharge/Length of Stay:

Sub-recipients shall make every effort to ensure program participants are discharged from Emergency Shelter services **only** when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

f. Safety and Shelter Safeguards for Special Populations:

Safety and Shelter Safeguards shall be determined by the individual Special Population service provider's policies and clearly communicated to program participants.

3. TRANSITIONAL HOUSING FOR THE HOMELESS

Only transitional housing programs funded in Fiscal Year 2010 Emergency Shelter Grant Program may continue to be funded under the Emergency Solutions Grant Program, as long as the program met the criteria under the former emergency shelter definition, which is "any facility, the primary purpose of which is to provide temporary or transitional shelter for the homeless in general or for specific populations of the homeless".

Minimum standards for transitional housing programs funded through the ESG shall be the same as transitional housing programs funded under the RNCOC. Refer to that section for minimum standard requirements. **Only people who qualify as "homeless" based on Category 1 or 4* of the "homeless" definition found at 24 CFR 576.2 are eligible for transitional housing assistance. ***

See Exhibit A and Exhibit D

1. ELIGIBILITY/PRIORITIZATION

Minimum standards for determining and prioritizing which eligible families and individuals shall receive homelessness prevention assistance and which eligible families and individuals shall receive rapid re-housing assistance are:

a. Rapid Re-housing (RRH):

To be eligible for RRH Housing Relocation and Stabilization Services and short-term and medium-term rental assistance, people must:

- Meet the federal criteria under paragraph (1) of the “homeless” definition in 24 CFR 576.2; **OR**
- Meet the criteria under paragraph (4) of the “homeless” definition in 24 CFR 576.2, and live in an emergency shelter or other place described in paragraph 91) of the “homeless” definition.

b. Homelessness Prevention (HP):

To be eligible for HP Housing Relocation and Stabilization Services and short-term and medium-term rental assistance, people **must require** HP services to prevent moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2, have an annual income **below** 30% of the median income for the area, and:

- Meet the federal criteria under the “at risk of homelessness” definition in 24 CFR 576.2; **OR**
- Meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR 576.2

2. PARTICIPANT CONTRIBUTION

Minimum standards for determining what percentage or amount of rent and utilities costs each program participant shall pay while receiving homelessness prevention or rapid re-housing assistance are:

- a. Participant’s income shall be verified prior to approval for initial and additional financial assistance. Documentation of the participant’s income and expenses, including how the participant is contributing to housing costs, if at all, shall be maintained in participant’s file. This file shall also contain a plan to sustain housing following the assistance, including either a plan to increase income or decrease expenses or both.
- b. Any additional requirements regarding the percentage or amount of rent and utilities costs each program participant shall pay shall be determined by the individual service provider’s policies and clearly communicated to program participants.

3. RENTAL ASSISTANCE DURATION AND ADJUSTMENT

Minimum standards for determining how long a particular program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time are:

- a. Participants received approval for the minimum amount of financial assistance necessary to prevent homelessness. Documentation of financial need shall be kept in the participant's file for each month of financial assistance received. Participants shall not be approved for more rental assistance than can be justified given their income and expenses at a given time.
- b. Any additional requirements regarding how long a program participant shall be provided with rental assistance and whether and how the amount of that assistance shall be adjusted over time shall be determined by the individual service provider's policies and clearly communicated to program participants.

4. SERVICE TYPE, AMOUNT & DURATION

Minimum standards for determining the type, amount, and duration of housing stabilization and/or relocation services provided to a program participant, including maximum amount of assistance, maximum number of months the program participant may receive assistance, or the maximum number of times the program participant may receive assistance, are:

a. Financial Assistance:

- Use with other subsidies: Payment for Financial Assistance costs shall not be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
- Rental application fees: Payments shall only be made for fees charged by the owner to all applicants.
- Security deposits: Payments shall not exceed two (2) month's rent.
- Last month's rent: Payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total rental assistance.
- Utility deposits: Payments shall only be made for gas, electric, water and sewage deposits.
- Utility payments:
 - Payments shall not exceed 24 months per participant, including no more than 6 months of utility payments in arrears, per service;
 - A partial payment counts as 1 month;
 - Payment shall only be made if the utility account is in the name of the participant or a member of the same household;
 - Payment shall only be made for gas, electric, water and sewage costs;
 - Participants shall not receive more than 24 months of utility assistance within any 3-year period.

- *Moving costs*: Payments shall only be made for temporary storage fees accrued after the date the participant begins receiving housing relocation and stabilization services and prior to the date that the participant moves into permanent housing. Payment shall not be made for storage fees in arrears.

b. Housing Relocation and Stabilization Services:

- *Housing search and placement services*: Payment shall only be made for assisting participants to locate, obtain and retain suitable permanent housing through provision of the following services:
 - Assessment of housing barriers, needs and preferences
 - Development of an action plan for locating housing
 - Housing search
 - Outreach to and negotiation with owners
 - Assistance with submitting rental applications and understanding leases
 - Assessment of housing for compliance with ESG requirements for habitability, lead-based paint and rent reasonableness
 - Assistance with obtaining utilities and making moving arrangements
 - Tenant counseling

Payment for housing search and placement services shall not exceed 24 months during any 3-year period.

- *Housing stability case management*: Payment shall only be made for assessing, arranging, coordinating and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing through provision of the following services:
 - Using centralized or coordinated assessment system
 - Conducting the initial evaluation, including verifying and documenting participant eligibility
 - Counseling
 - Developing, securing and coordinating services and obtaining Federal, State and local benefits
 - Monitoring and evaluating participant progress
 - Providing information and referral to other providers
 - Developing an individualized housing and service plan
 - Conducting re-evaluations

Payment for housing stability case management services provided while the participant is seeking permanent housing shall not exceed 30 days.

Payment for housing stability case management services provided while the participant is living in permanent housing shall not exceed 24 months.

- *Mediation:* Payment shall only be made for the cost of mediation between the participant and the owner or person with whom the participant is living, if it is necessary to prevent the participant from losing the permanent housing where he/she resides. Payment for mediation services shall not exceed 24 months during any 3-year period.
- *Legal services:* Payment shall only be made for the cost of legal services, if they are necessary to resolve a legal problem that prohibits the participant from obtaining permanent housing or will likely result in the participant losing the permanent housing where he/she resides. Payment for legal services shall not exceed 24 months during any 3-year period.
- *Credit repair:* Payment shall only be made for the cost of assisting the participant in obtaining skills related to household budgeting, managing money, accessing a free personal credit report and resolving personal credit problems. Payment will not be made for a debt or modification of a debt. Payment for credit repair services shall not exceed 24 months during any 3-year period.

c. Rental Assistance

- Payment shall not exceed 24 months total during a 3-year period in tenant-based or project-based housing.
- Payment for short-term rental assistance shall not exceed 3 months
- Payment for medium-term rental assistance shall be for more than 3 months, but shall not exceed 24 months.
- Payment for rent arrears shall not exceed 6 months and shall be a one-time payment, including any late fees.
- Except for a one-time payment of rental arrears on the participant's portion, payment shall not be provided to a participant who is receiving tenant-based rental assistance or living in a unit receiving project-based assistance or to a participant who has been provided with replacement housing payments under the Uniform Relocation Act (URA), during the period of time covered by the URA payments.
- Payment shall not exceed the Fair Market Rent established by HUD (24 CFR 888) and shall comply with HUD's standards of rent reasonableness (24 CFR) 982.507).
- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet or late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
- Payment for rent shall only be made when there is a rental assistance agreement between the agency and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the provider with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period, and late payment penalty requirement as the participant's lease.

- Payment of any late payment penalties incurred by the provider shall not be claimed for reimbursement by ESG.
- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner, except for payment of rental arrears.
- Payment shall only be made once the participant has been deemed eligible for assistance.
- Payments shall not be made until required re-certifications has been completed and all documentation of continued eligibility is received. For HP clients, the 4th, 7th, 10th, etc. month of payment cannot be processed until re-certification of client eligibility is confirmed. For RRH clients, the 13th month of payment cannot be processed until re-certification of client eligibility is confirmed.

d. Tenant-Based Rental Assistance

The rental assistance agreement with the unit owner shall be terminated without further payment if:

- The participant moves out of the unit
- The lease terminates and is not renewed
- The participant becomes ineligible to receive ESG rental assistance

e. Project-Based Rental Assistance

Payment shall only be made under the following conditions:

- The lease has an initial term of one year
- The rental assistance agreement covers one or more permanent housing units in the same building
- Each unit covered by the agreement is only occupied by participants
- Payment will only be made for up to 100% of the first month's rent, if the participant signs a lease and moves into the unit before the end of the month.

Any additional requirements regarding the type, amount, and duration of housing stabilization and/or relocation services that will be provided to a program participant, including any limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

5. RE-EVALUATIONS

Minimum standards for completing eligibility re-evaluations of individuals and families are:

a. Timing:

- Homelessness Prevention: Participants shall be re-evaluated not less than one every three months. The next month's rental payment shall not be paid until completion of the re-certification process.
- Rapid Re-housing: Participants shall be re-evaluated not less than one annually. The next month's rental payment shall not be paid until completion of the re-certification process

b. Eligibility

- The participant shall have an annual income that is 30 percent of median family income for the area or less, as determined by HUD; and
- The participant shall continue to lack sufficient resources and support networks necessary to retain housing without ESG assistance.

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1. OVERVIEW

The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act) enacted into law on May 20, 2009 consolidated three of the separate homeless assistance programs administered by the U.S. Department of Housing and Urban Development (HUD) under the McKinney-Vento Homeless Assistance Act into a single grant program. The HEARTH Act also codified into law the Continuum of Care (CoC) planning process, a longstanding part of HUD's application process to assist homeless persons by providing greater coordination in responding to their needs. The interim regulation was published in the Federal Register on July 31, 2012 and became effective August 30, 2013.

The purpose of the CoC program is to promote communitywide commitment to the goal of ending homelessness; providing funding for efforts by nonprofit providers, and State and local governments to quickly rehouse homeless individuals and families while minimizing the trauma and dislocation caused to homeless individuals, families, and communities by homelessness; promote access to and effective utilization of mainstream programs by homeless individuals and families; and optimize self-sufficiency among individuals and families experiencing homelessness.

The CoC program includes transitional housing, permanent supportive housing for disabled persons, permanent housing, supportive services, and Community Management Information Systems (formerly HMIS). A CoC is a geographically based group of representatives that carries out the planning responsibilities of the CoC program, as set for the in 24 CFR part 578. These representatives come from organizations that provide services to the homeless, or represent the interests of the homeless or formerly homeless. The three major duties of a CoC are to (1) operate the CoC; (2) designate a CMIS for the CoC; and (3) develop a plan for the CoC. In rural Nevada, the Rural Nevada Continuum of Care (RNCOC) is the homeless planning group that oversees the CoC process for 14 rural counties and Carson City.

24 CFR 576.7(9) requires the RNCOC, in consultation with the Emergency Solutions Grants program funds within the geographic area, to establish and consistently follow written standards for providing CoC assistance. ***Each RNCOC recipient must also establish and follow local written standards for providing assistance, which at a minimum must include the RNCOC's Standards defined below.***

2. PROGRAM COMPONENTS AND ELIGIBLE ACTIVITIES

CoC funds may be used for projects under five program components: Permanent housing (PH), Permanent Supportive Housing for Disabled Persons (PSH), Transitional Housing (TH), Supportive services Only (SSO), and CMIS. Eligible costs include: CoC planning activities, Unified Funding Agency costs, acquisition, rehabilitation, new construction, leasing, rental assistance, supportive services, operating costs, CMIS, project administrative costs, relocation costs, and indirect costs. Projects funded in the RNCOC consist of permanent and transitional housing programs. The following Standards will summarize the RNCOC's minimum requirements for providing housing and services to PH, PSH, and TH clients.

The RNCOC developed the following Transitional Housing (TH) minimum standards to ensure:

- Program accountability to individuals and families experiencing homelessness;
- Program compliance with HUD regulations;
- Program uniformity;
- Adequate program staff competence and training, specific to target population served

RNCOC recipients must include the following minimal standards when developing and implementing local programs.

1. CLIENT INTAKE PROCESS

Minimum standards for evaluating individual and family eligibility for assistance under a Transitional Housing program **not to exceed 24 months** shall include the following: (*Note: The program shall ensure active client participation and informed consent*)

Eligibility Criteria

- a. Description of how program participants will be screened via the community's Coordinated Assessment and Referral System, and/or a description of how referrals will be accepted from the intake agency which will ensure that, and placement priority will be determined through the use of the Vulnerability Tool*. *See Exhibit E clients who are most vulnerable will be given priority access to available programs.
- b. All adult program participants must meet the following program eligibility requirements:
 - 18 years of age or older
 - Qualify as "homeless" based on paragraphs (1 or 4)* of the homeless definition
*See Exhibit A
 - If applicable, how adult household members are able to participate in developing and carrying out an appropriate participation plan.
- c. Additional program eligibility requirements. RNCOC prefers that only the following additional requirements be included in the standards for evaluating a household's eligibility for assistance; however, acknowledges that existing grantees may have other criteria. Written standards must include all eligibility requirements and the reasoning behind the decision to include them if other than the following:
 - Chronically homeless
 - Residency requirements
 - Other program-specific requirements (i.e. limiting program entry to a specific subpopulation of individuals or families experiencing homelessness)
- d. A description of all reasons that programs may disqualify an individual or family from program entry. (The RNCOC encourages providers to disqualify only for the following reasons):
 - Household make-up, provided it does not violate HUD's Fair Housing, Equal Opportunity, and Equal Access to Housing in HUD Program requirements (Singles Only programs can

disqualify households with children, Families Only programs can disqualify single households, etc.)

- Criminal record that includes violent crimes within the last three years
 - Status as a lifetime registered sex offender.
- e. RNCOC encourages providers to design programs so that agencies don't disqualify an individual or family from program entry for lack of income or employment status.
 - f. Programs cannot disqualify an individual or family because of evictions or poor rental history.
 - g. The program explains the services that are available and the requirements for participation and secures a commitment from each adult household member to participate in program services prior to admitting the individual or family into the program.
 - h. The program will maintain a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants have copies of all Releases of Information that they have signed, and have the right to revoke any Release of Information without penalty.

2. HOUSING CRITERIA

Minimum standards for accessing housing are:

- a. The program shall provide safe, affordable housing that meets participant's needs in accordance with client intake practices and within HUD guidelines for transitional housing programs.
- b. In providing or arranging for housing, the program shall consider the needs of the individual or family experiencing homelessness.
- c. The program provides assistance in accessing suitable housing.
- d. The program may provide assistance with moving costs.
- e. The program ensures that there are executed occupancy agreements or leases (or subleases) with all program participants residing in housing.
 - The lease agreement with the participant is for a term of at least one month and ends in 24 months and cannot be extended
- f. The program shall not charge minimum rent.
- g. If the program imposes occupancy charges, the *charges may not exceed the highest of:*
 - 30% of the household's monthly adjusted gross income; or
 - 10% of the household's monthly income; or
 - If the household receives payment for welfare assistance from a public agency and a part of the payment is specifically designated by the agency to meet the household's housing costs, the occupancy charge cannot be higher than the portion that has been designated for housing costs.

When determining rental costs, agencies cannot round up to the nearest dollar.

3. CASE MANAGEMENT SERVICES

Minimum standards for case management shall include:

a. Criteria (Required)

- How individual case management is provided to program participants on a regular and consistent basis as determined by the individual's case plan. Case management shall include the following:
 - Assessing, planning, coordinating, implementing and evaluating the overall service delivered to the participant.
 - Helping participants learn to live in housing, maintain their housing in a safe manner, and work with the landlord.
 - Helping participants create support systems and participate in community as they desire.
- Individualized budgeting and money management services are provided to program participants as needed.

b. Criteria (other eligible services to encourage self-sufficiency) If applicable, written standards shall include descriptions of how the Provider will assist clients to achieve the following criteria to ensure RNCOC performance measures are met:

- Job preparation and attainment, such as career counseling, job preparation training, dress and grooming, job placement, and job retention. *(Part of RNCOC performance measures)*
- Assistance in accessing mainstream benefits, including food stamps, child care assistance, and health insurance. *(Part of RNCOC performance measures)*
- Educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education. *(Part of RNCOC performance measures)*
- Basic life skills information, including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security cards, birth certificate, etc.)/
- Assistance with food, clothing and/or transportation.
- Interpersonal skill building, such as developing positive relationships with others, parenting skills, effective communication, decision-making, conflict resolution, and stress management.
- The program may require program participants to take part in supportive services provided through the program as a condition of continued participation, as long as the services are not disability-related (e.g. mental health, outpatient health services)
 - The program can only require disability-related services if the participant's housing stability is in jeopardy.

Only projects whose primary purpose is to provide substance abuse treatment services may require program participants to take part in substance abuse treatment services as a condition of continued program participation.

4. SERVICE COORDINATION

Minimum standards for service coordination are:

- a. The program shall coordinate with community agencies and individuals for the provision of those services needed and requested by the individual or family, but that are not directly provided by the programs.
 - Arrangements shall be made as appropriate with community agencies and individuals for the provision of medical services, mental health services, legal services, and other assistance requested by the participant, which are not provided directly by the program.

5. TERMINATION OF ASSISTANCE

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

At a minimum, standards for termination of assistance are:

- a. If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected.
- b. The program may terminate services when the following occurs:
 - A participant engages in violent or aggressive behavior toward others, including program staff.
 - A participant uses illegal drugs in their unit.
 - A participant engages in criminal activity in their unit.
- c. In cases when a participant is terminated from services for other than the above stated reasons, the burden is on the Program to provide evidence that it considered extenuating circumstances and made significant attempts to help the participant continue in the program before deciding to terminate assistance.
- d. The program follows a written termination process and has a process for appeals/grievances. This information is provided to participants at the beginning of the program, and if/when termination of services occurs.

6. FOLLOW UP SERVICES

Minimum standards for continuity of services to all participants following exit from the program shall be as follows:

- a. The program shall include exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
- b. The program shall attempt to follow up with phone or written contact at least once every 30 days for the first three months after the client exits the program, to determine if there is any need for further services, to offer assistance in obtaining those services, and to evaluate the services that were provided.
- c. Supportive services may be provided to participants after their exit from the program.

7. CLIENT FILES/RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow RNCOC and HUD to determine whether program requirements are being met and comply with HUD regulations. Documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

- a. The file maintained on each participant should, at a minimum, include information required by HUD, homelessness eligibility in the preferred order as required by HUD (third-party, intake observation, self-certification), participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, discharge paperwork, CMIS service transactions, and any follow-up and evaluation data that is compiled.
- b. Client information must be entered into CMIS in accordance with the data quality, timeliness and additional requirements found in the CMIS/HMIS Policies and Procedures manual, and implemented in the RNCOC Performance Standards. At a minimum, programs must record the date the client enters and exits the program, and update the client's information as changes occur.
- c. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate, except to project staff and other agencies as required by law. Participants must give informed consent to release any personal identifying information (PII) data to be utilized for research, teaching and public interpretation.
- d. All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by scanning, photocopying, or similar methods may be substituted for the original records.
- e. Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants. Records pertaining to other funding sources must adhere to those record retention requirements.

8. EVALUATION AND PLANNING

Minimum standards shall include program planning and evaluation procedures as follows:

- a. The program shall have written goals and objectives for its housing and services that are consistent with RNCOC goals and objectives, and includes any commitments made to participants and the local community.
- b. The program shall include a review of the case management, housing, and follow-up needs of participants served by the program and the existing services that are available to meet these needs, on at least an annual basis.
- c. The program shall include a process where the agency will review and revise, as appropriate, goals, objectives and activities based upon the data generated through the review of

participant's needs, existing services, and the follow-up evaluations on at least an annual basis.

- d.** The program shall include a process for conducting on-going evaluations of its services to participants.
- e.** The program shall exhibit due regard for the participant's privacy in conducting and reporting its evaluation.
- f.** The program's planning and/or evaluation process shall be open to paid and volunteer staff, program participants, the agency's Board of Directors, if applicable, and members of the RNCOC Steering Committee.

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Research has shown that permanent supportive housing is the most intensive and effective solution for people experiencing homelessness. It is not a one-size-fits-all approach and should only be offered to those households that truly need that level of support. Unless there is a systematic way to prioritize households with the highest needs, the most vulnerable homeless, including the chronically homeless, are often not the population who receives this type of assistance.

HUD published the following Prioritization Notice in July 2014 which established a **suggested** order of priority for households served in permanent supportive housing programs, and provides uniform recordkeeping requirements to document the chronically homeless status of program participants. The intent of the Notice is to move CoC's and recipients of CoC Program funding for PSH in a direction where chronically homeless persons, including chronically homeless unaccompanied youth or unaccompanied youth with the highest needs, are prioritized for assistance **above** other eligible households. The RNCOC encourages all PSH grantees to incorporate the process described in the Notice when developing local written standards. The Notice can be found under the following link:

[NOTICE CPD-14-012: PRIORITIZING PERSONS EXPERIENCING CHRONIC HOMELESSNESS IN PERMANENT SUPPORTIVE HOUSING AND RECORDKEEPING REQUIREMENTS FOR DOCUMENTING CHRONIC HOMELESS STATUS](#)

The RNCOC has developed the following Permanent (Supportive) Housing (PH/PSH) minimum standards to ensure:

- Program accountability to individuals and families experiencing homelessness;
- Program compliance with HUD regulations;
- Program uniformity; and
- Adequate program staff competence and training, specific to target population served

Although the RNCOC strongly encourages PSH providers to adopt recommendations provided in the Notice above, at a minimum the following written standards must be included when developing and implementing local programs.

1. CLIENT INTAKE PROCESS

Minimum standards for evaluating individual and family eligibility for assistance under a Permanent Housing/Permanent Supportive Housing Program (long term housing for 24+ months) shall include the following: (*Note: The program shall ensure active client participation and informed consent*)

Eligibility Criteria

- a. Description of how program participants will be screened via the community's Coordinated Assessment and Referral System, and/or a description of how referrals will be accepted from the intake agency which will ensure that clients who are most vulnerable will be given priority access to available programs.
- b. All adult program participants must meet the following program eligibility requirements:
 - 18 years of age or older

- Qualify as “literally homeless” based on paragraphs (1 or 4)* of the homeless definition
*See Exhibit A
At least one adult in the household has a disabling condition
 - Adult household members are able to participate in developing and carrying out an appropriate participation plan and maintain accountability of said plan
- c. Additional program eligibility requirements. RNCOC prefers that only the following additional requirements be included in the standards for evaluating a household’s eligibility for assistance; however acknowledges that existing grantees may have other criteria. Written standards must include all eligibility requirements and the reasoning behind the decision to include them if other than the following:
- Chronically homeless
 - Residency requirements
 - Other program-specific requirements (i.e. limiting program entry to a specific subpopulation of individuals or families experiencing homelessness)
- d. A description of all reasons that programs may disqualify an individual or family from program entry. (The RNCOC encourages providers to disqualify only for the following reasons):
- Household make-up, provided it does not violate HUD’s Fair Housing, Equal Opportunity, and Equal Access to Housing in HUD Program requirements (Singles Only programs can disqualify households with children, Families Only programs can disqualify single households, etc.t)
 - Criminal record that includes violent crimes within the last three years
 - Status as a lifetime registered sex offender.
- e. RNCOC encourages providers to design programs so that agencies don’t disqualify an individual or family from program entry for lack of income or employment status.
- f. Programs cannot disqualify an individual or family because of evictions or poor rental history.
- g. The program explains the services that are available and the requirements for participation and secures a commitment from each adult household member to participate in program services prior to admitting the individual or family into the program.
- h. The program maintains a Release of Information that allows the sharing of information with relevant people and/or agencies. Program participants have copies of all Releases of Information that they have signed, and have the right to revoke any Release of Information without penalty.

2. HOUSING CRITERIA

Minimum standards for accessing housing are:

- a. The program shall provide safe, affordable housing that meets participant’s needs in accordance with client intake practices and within HUD guidelines for permanent (supportive) housing programs.
- b. In providing or arranging for housing, the program shall consider the needs of the individual or family experiencing homelessness.

- c. The program provides assistance in accessing suitable housing, and meets housing standards set forth in 24 CFR 576.75.
- d. The program may provide assistance with moving costs.
- e. The program signs occupancy agreements or leases (or subleases) with all program participants residing in housing.
- f. The program ensures that there are executed occupancy agreements or leases (or subleases) with all program participants residing in housing.
 - The lease agreement with the participant is for a term of at least one year, which is terminable for cause. The lease must be automatically renewable upon expiration for a minimum term of one month.
- g. The program shall not charge minimum rent.
- h. If the program imposes occupancy charges, the charges may not exceed the highest of:
 - 30% of the household's monthly adjusted gross income;
 - 10% of the household's monthly income; or
 - If the household is receiving payment for welfare assistance from a public agency and a part of the payment is specifically designated by the agency to meet the household's housing costs, the portion paid by the program participant cannot exceed the amount that has been designated for housing costs.
 - When determining rental costs, agencies cannot round up to the nearest dollar.

3. CASE MANAGEMENT SERVICES

Minimum standards for case management shall include:

a. *Criteria*

- Individual case management plans which are provided to program participants on a regular and consistent basis as determined by the individual's case plan. Case management plans shall include the following:
 - Assessing, planning, coordinating, implementing and evaluating the overall service delivered to the participant.
 - Helping participants learn to live in housing, maintain their housing in a safe manner, and work with the landlord.
 - Helping participants create support systems and participate in community as they desire.
- Individualized budgeting and money management services, provided to program participants as needed.
- Job preparation and attainment, such as career counseling, job preparation training, dress and grooming, job placement, and job maintained. *(Part of RNCOC performance measures)*
- Assistance in accessing mainstream benefits, including food stamps, child care assistance, and health insurance. *(Part of RNCOC performance measures)*

- Educational advancement, such as GED preparation and attainment, post-secondary training, and vocational education. (*Part of RNCoC performance measures*)
- Basic life skills information, including housekeeping, menu planning and food preparation, consumer education, leisure-time activities, transportation, and obtaining vital documents (Social Security cards, birth certificate, etc.).
- Assistance with food, clothing and/or transportation.
- Interpersonal skill building, such as developing positive relationships with others, parenting skills, effective communication, decision-making, conflict resolution, and stress management.
- The program may require program participants to take part in supportive services provided through the program as a condition of continued participation, as long as the services are not disability-related (e.g. mental health, outpatient health services)
- The program can only require disability-related services if the participant's housing stability is in jeopardy.

Only projects whose primary purpose is to provide substance abuse treatment services may require program participants to take part in substance abuse treatment services as a condition of continued program participation.

4. SERVICE COORDINATION

Minimum standards for service coordination are:

- a. The program shall coordinate with community agencies and individuals for the provision of those services needed and requested by the individual or family, but that are not directly provided by the programs.
 - Arrangements shall be made as appropriate with community agencies and individuals for the provision of medical services, mental health services, legal services, and other assistance requested by the participant, which are not provided directly by the program.

5. TERMINATION OF ASSISTANCE

Termination is expected to be limited to only the most severe cases. Programs will exercise judgment and examine all extenuating circumstances when determining if violations are serious enough to warrant termination.

At a minimum, standards for termination of assistance are:

- a. If a program violation occurs and the provider terminates assistance as a result, the termination shall follow an established process that recognizes the rights of the individuals affected.
- b. The program may terminate services when the following occurs:
 - A participant engages in violent or aggressive behavior toward others, including program staff.
 - A participant uses illegal drugs in their unit.

- A participant engages in criminal activity in their unit.
- c. In cases when a participant is terminated from services for other than the above stated reasons, the burden is on the Program to provide evidence that it considered extenuating circumstances and made significant attempts to help the participant continue in the program before deciding to terminate assistance.
- d. The program follows a written termination process and has a process for appeals/grievances. This information is provided to participants at the beginning of the program, and if/when termination of services occurs.

6. FOLLOW UP SERVICES

Minimum standards for continuity of services to all participants following exit from the program shall be as follows:

- a. The program shall include exit plans with the participant to ensure continued housing stability and connection with community resources, as desired.
- b. The program shall attempt to follow up with phone or written contact at least once every 30 days for the first three months after the client exits the program, to determine if there is any need for further services, to offer assistance in obtaining those services, and to evaluate the services that were provided.
- c. Supportive services may be provided to participants after their exit from the program.

7. CLIENT FILES/RECORDKEEPING

Minimum standards shall ensure sufficient written records are established and maintained to allow RNCOC and HUD to determine whether program requirements are being met and comply with HUD regulations. Documentation necessary for the effective delivery and tracking of service will be kept up to date and the confidentiality of program participants will be maintained.

- a. The file maintained on each participant should, at a minimum, include information required by HUD, homelessness eligibility in the preferred order as required by HUD (third-party, intake observation, self-certification), participation agreements, service plans, case notes, information on the services provided both directly and through referrals to community agencies and individuals, discharge paperwork, CMIS service transactions, and any follow-up and evaluation data that is compiled.
- b. Client information must be entered into CMIS in accordance with the data quality, timeliness and additional requirements found in the CMIS/HMIS Policies and Procedures manual, and implemented in the RNCOC Performance Standards. At a minimum, programs must record the date the client enters and exits the program, and update the client's information as changes occur.
- c. The program will maintain each participant file in a secure place and shall not disclose information from the file without the written permission of the participant as appropriate, except to project staff and other agencies as required by law. Participants must give informed consent to release any personal identifying information (PII) data to be utilized for research, teaching and public interpretation.

- d. All records pertaining to Continuum of Care funds must be retained for the greater of 5 years or the participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.
- e. Where Continuum of Care funds are used for the acquisition, new construction, or rehabilitation of a project site, records must be retained until 15 years after the date that the project site is first occupied, or used, by program participants. Records pertaining to other funding sources must adhere to those record retention requirements.

8. EVALUATION AND PLANNING

Minimum standards shall include program planning and evaluation procedures as follows:

- a. The program shall have written goals and objectives for its housing and services that are consistent with RNCoC goals and objectives, and includes any commitments made to participants and the local community.
- b. The program shall include a review of the case management, housing, and follow-up needs of participants served by the program and the existing services that are available to meet these needs, on at least an annual basis.
- c. The program shall include a process where the agency will review and revise, as appropriate, goals, objectives and activities based upon the data generated through the review of participant's needs, existing services, and the follow-up evaluations on at least an annual basis.
- d. The program shall include a process for conducting on-going evaluations of its services to participants.
- e. The program shall exhibit due regard for the participant's privacy in conducting and reporting its evaluation.
- f. The program's planning process shall be open to paid and volunteer staff, program participants, the agency's Board of Directors, if applicable, and members of the RNCoC Steering Committee.

9. HOUSING FIRST APPROACH

The most successful model for housing people who experience chronic homelessness is permanent supportive housing using a "Housing First" approach, which is a client-driven strategy that provides immediate access to housing without requiring participation in psychiatric treatment, treatment for sobriety, or other service participation requirements. After settling into housing, clients are offered a wide range of supportive services that focus primarily on helping them maintain their housing. The RNCoC strongly encourages recipients of PH/PSH funding to implement a Housing First approach. Grantees that implement a Housing First approach must ensure written standards include the following core components:

- a. Few to no programmatic prerequisites to permanent housing entry
 - People experiencing homelessness are offered permanent housing with no programmatic preconditions such as demonstration of sobriety, completion of alcohol or drug treatment, or agreeing to comply with a treatment regimen upon entry into the program.

People are also not required to first enter a transitional housing program in order to enter permanent housing.

- b. Low barrier admission policies**
 - Permanent supportive housing's admissions policies are designed to "screen-in" rather than "screen-out" applicants with the greatest barriers to housing, such as having no or very low income, poor rental history and past evictions, or criminal histories. Housing programs may have tenant selection policies that prioritize people who have been homeless the longest or who have the highest service needs as evidenced by vulnerability assessment or the high utilization of crisis services.
- c. Rapid and streamlined entry into housing**
 - Many people experiencing chronic homelessness may experience anxiety and uncertainty during a lengthy housing application and approval process. In order to ameliorate this, Housing First permanent supportive housing models make efforts to help people experiencing homelessness move into permanent housing as quickly as possible, streamlining application and approval processes, and reducing wait times.
- d. Supportive services that are voluntary, but can and should be used to persistently engage tenants to ensure housing stability**
 - Supportive services are proactively offered to help tenants achieve and maintain housing stability, but tenants are not required to participate in services as a condition of tenancy. Techniques such as harm reduction and motivational interviewing may be useful. Harm reduction techniques can confront and mitigate the harms of drug and alcohol use through non-judgmental communication while motivational interviewing may be useful in helping households acquire and utilize new skills and information.
- e. Tenants have full rights, responsibilities, and legal protections**
 - The ultimate goal of the Housing First approach is to help people experiencing homelessness achieve long-term housing stability in permanent housing. Permanent housing is defined as housing where tenants have leases that confer the full rights, responsibilities, and legal protections under Federal, state and local housing laws. Tenants are educated about their lease terms, given access to legal assistance, and encouraged to exercise their full legal rights and responsibilities. Landlords and providers in Housing First models abide by their legally defined roles and obligations. For instance, landlords and providers do not enter tenants' apartments without tenant's knowledge and permission except under legally-defined emergency circumstances, or as required applicable housing programs (e.g. HOME and Low-Income Housing Tax Credit programs requires 24-hour notice to conduct inspections for health and safety). Many Housing First permanent supportive housing programs also have a tenant association or council to review program policies and provide feedback, and formal processes for tenants to submit suggestion or grievances.
- f. Practices and policies to prevention lease violations and evictions are in place**

- Housing First supportive housing programs should incorporate practices and policies that prevent lease violations and evictions among tenants. For instance, program policies consistent with a Housing First approach do not consider alcohol or drug use in and of itself to be lease violations, unless such use results in disturbances to neighbors or is associated with illegal activity (e.g. selling illegal substances.) Housing First models may also have policies that give tenants some flexibility and recourse in the rent payment, which in many subsidized housing programs is 30% of the participant's income. For example, rather than moving towards eviction proceedings due to missed rent payments, programs may allow tenants to enter into payment installment plans for rent arrearages, or offer money management assistance to tenants.
- g.** Is applicable in a variety of housing models
- The Housing First approach can be implemented in different types of permanent supportive housing settings, including scattered-site models in private market apartments, where rental assistance is provided, and tenants have access mobile and site-based supportive services; single-site models in which permanent supportive housing buildings are newly constructed or rehabilitated and tenants have access to voluntary on-site services; and set-asides, where supportive services are offered to participants in designated units within affordable housing developments.

DEFINITIONS

At-risk of Homelessness – An individual or family who has income below 30% of area median family income for the area, as defined by HUD, and who does not have sufficient resources or support networks immediately available to prevent them from moving into an emergency shelter or other place described in the “homeless” definition (See Exhibit A and Exhibit B), and meets one if the following definitions defined under 24 CFR 578.3 (CoC program) or 24 CFR 576.2 (ESG program). May also include a child or youth who qualifies as homeless under other Federal programs.

CMIS/HMIS – Community Management Information System (formerly the Homeless Management Information System) means the information system designated by the Continuum of Care to comply with the HMIS requirements prescribed by HUD.

CMIS/HMIS Lead Agency – The entity designated by the Continuum of Care to operate the CMIS/HMIS on its behalf.

Chronically Homeless – (Revised as of January 4, 2016) A person (or family with an adult or minor “head of household”) is chronically homeless if they have been homeless for at least 12 months or on at least 4 separate occasions in the last 3 years, **as long as the combined occasions equal at least 12 months and each break in homelessness separating the occasions included at least 7 consecutive nights of not living in a place not mean for human habitation, a safe haven, or in an emergency shelter.** For this definition, **persons must have been homeless in a place not meant for human habitation, in an emergency shelter, or in a safe haven immediately prior to being defined as a chronically homeless person.** In addition, persons must have a documented diagnoses of one or more of the following conditions: Substance abuse disorder, serious mental illness, developmental disability, post-traumatic stress disorder, cognitive impairments resulting from brain injury, or chronic physical illness or disability. (Refer to 24 CFR 578.3 for specific requirements).

CoC/Continuum of Care – A group composed of representatives of relevant organizations, which generally includes nonprofit homeless providers; victim service providers; faith-based organizations; governments; businesses; advocates; public housing agencies; school districts; social services providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless or formerly homeless persons that are organized to plan for and provide a system of outreach, engagement, and assessment; emergency shelter; rapid re-housing; transitional housing; permanent housing; and prevention strategies to address the various needs of homeless persons and persons at risk of homelessness for a specific geographic area.

ESG – Emergency Solutions Grant Program (24 CFR part 576)

Developmental Disability – Defined in Section 102 of the Developmental Disability Assistance and Bill of Rights Act of 2000, and means a severe, chronic disability that is attributable to a mental or physical impairment or combination, **and** is manifested before age 22, **and** is likely to continue indefinitely. It must result in substantial limitations in 3 or more major life activities (self-care, receptive and expressive

language, learning, mobility, self-direction, capacity for independent living, or economic self-sufficiency) **AND** reflects need for special services or individualized support, or other form of assistance this is lifelong or extended duration.

Disabling Condition – A physical, mental, or emotional impairment, including an impairment caused by alcohol or drug abuse, post-traumatic stress disorder, or brain injury, which is expected to be of long-continued and indefinite duration, substantially impedes the person’s ability to live independently, and is of such a nature that such ability could be improved with more suitable housing conditions; a developmental disability as defined in Section 102 of the Developmental Disabilities Assistance Bill of Rights Act of 2000; or Acquired immunodeficiency Syndrome (AIDS) or any conditions arising from the etiologic agent for Acquired Immunodeficiency Syndrome, including infection with the Human Immunodeficiency Virus (HIV).

Emergency Shelter – 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 does not require occupants to sign leases or occupancy agreements.

Fair Market Rent – Means the rents published in the Federal Register annually by HUD

Families – Family includes, but is not limited to, regardless of marital status, actual or perceived sexual orientation, or gender identity, the followings: (1) A single person, who may be an elderly person, displaced person, disabled person, near-elderly person, or any other single person; or (2) A group of persons residing together, and such group includes, but is not limited to (a) A family with or without children (a child who is temporarily away from the home because of placement in foster care is considered a member of the family); (b) An elderly family; (c) A near-elderly family; (d) A disabled family; (e) A displaced family; and (f) The remaining member of a tenant family.

Homeless – There are 4 categories within the definition of homelessness, as defined under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act); the most common definition being an individual or family who lacks a fixed, regular, and adequate nighttime residence under Category 1. **See Exhibit A**

Homeless Prevention – A program targeted to individuals and families at risk of homelessness. Specifically, this includes those that meet the criteria under the “at risk of homelessness” definition at 576.2, as well as those who meet the criteria in Category 2, 3, and 4 of the “homeless definition and have an annual income **below 30%** of family median income for the area.

Housing First – An approach to quickly and successfully connect individuals and families experiencing homelessness to permanent housing without preconditions and barriers to entry, such as sobriety, treatment or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry.

Permanent Housing – Community-based housing without a designated length of stay, and includes both Permanent Supportive Housing and Rapid Re-housing.

Permanent Supportive Housing – Permanent housing in which supportive services are provided to assist homeless persons with a disability to live independently.

Physical, Mental or Emotional Impairment – Expected to be long-continuing or of indefinite duration; substantially impedes the person’s ability to live independently, and could be improved by more suitable housing.

Rapid Re-housing – Housing relocation and stabilization services and short- or medium-term rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. Assistance may be provided for up to 24 months during any 3-year period, and may include rental arrear for up to six months, to eligible persons who qualify as homeless under Category 1 and 4 of the “homeless” definition. **See Exhibit A and Exhibit C**

Recipient – An applicant that signs a grant agreement with HUD.

Rent Reasonableness – A process conducted by the recipient or sub-recipient to determine if the rent charge for the unit receiving rental assistance is reasonable in relation to rents being charged for comparable unassisted units, taking into account the location, size, type, quality, amenities, facilities, and management and maintenance of each unit. Reasonable rent must not exceed rents currently being charged for comparable unassisted units.

Safe Haven – For the purpose of defining chronically homeless, supportive housing that means the following: (1) serves hard to reach homeless persons with severe mental illness who came from the streets and have been unwilling or unable to participate in supportive services; (2) provides 24-hour residence for eligible persons for an unspecified period; (3) has an overnight capacity limited to 25 or fewer persons; and (4) provides low-demand services and referrals for the residents.

Street Outreach – The act of reaching out to unsheltered homeless people; connecting them with emergency shelter, housing or critical services; and provide urgent, **nonfacility-based** care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Sub-recipient – A private nonprofit organization, State, local government, or instrumentality of State or local government that receives a sub-grant from the recipient to carry out a project.

Transitional Housing – Facilitates the movement of homeless individuals and families to permanent housing within 24 months

Unsheltered Homeless – Individuals and families who qualify as homeless under Category 1(i) of the “homeless” definition. **See Exhibit A**

Victim Service Provider – A private nonprofit organization whose primary mission is to provide services to victims of domestic violence, dating violence, sexual assault, or stalking. This term includes rape crisis centers, battered women’s shelters, domestic violence transitional housing programs, and other programs.

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EXHIBIT A: HUD DEFINITION FOR HOMELESS

HUD CRITERIA FOR DEFINING HOMELESSNESS	Category 1	Literally Homeless	<p>Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:</p> <ul style="list-style-type: none"> i. Has a primary nighttime residence that is a public or private place not meant for human habitation; ii. Is living in a publicly or privately operating shelter designated to provide temporary living arrangements (including congregate shelters; transitional housing; and hotels and motels paid for by charitable organization or by federal, state, and local government programs); <u>or</u> iii. Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	<p>Individual or family who will imminently lose their primary nighttime residence, provide that:</p> <ul style="list-style-type: none"> i. Residence will be lost within 14 days of the date of application for homeless assistance; ii. No subsequent residence has been identified; <u>and</u> iii. The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal Statutes	<p>Unaccompanied youth under 24 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:</p> <ul style="list-style-type: none"> i. Are defined as homeless under the other listed federal statutes; ii. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; iii. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; <u>and</u>; iv. Can be expected to continue in such status for an extended period of time due to special needs or barriers <p><i>Note: CoC projects may serve unaccompanied youth and families with children under this category only if the CoC applies to HUD Field Office to serve such populations, and HUD approves the request. If approved, no more than 10% of the total amount of funds awarded to all recipients within the CoC may be used to serve Category 3 population.</i></p>

	Category 4	Fleeing/Attempting to Flee DV	Any individual or family who: <ul style="list-style-type: none"> i. Is fleeing, or is attempting to flee, domestic violence; ii. Has no other residence; <u>and</u> iii. Lacks the resources or support networks to obtain other permanent housing
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EXHIBIT B: HUD DEFINITION FOR AT RISK OF HOMELESSNESS

HUD CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	Category 1	Individuals and Families	An individual or family who: <ul style="list-style-type: none"> i. Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u> ii. Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; <u>AND</u> iii. Meets one of the following conditions: <ul style="list-style-type: none"> A. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u> B. Is living in the home of another because of economic hardship; <u>OR</u> C. Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u> D. Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u> E. Lives in an SR or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u> F. Is exiting a publicly funded institution or system of care; <u>OR</u> G. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan (not applicable in rural Nevada)
	Category 2	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute

	Category 3	Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.
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EXHIBIT C: CROSS WALK OF HUD HOMELESS AND AT RISK DEFINITIONS AND ELIGIBILITY TO ESG PROGRAM COMPONENTS

ESG ELIGIBILITY BY COMPONENT	Emergency Shelter	<p>Individuals and families defined as “homeless” under the following categories are eligible for assistance in ES projects:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless • Category 2: Imminent Risk of Homelessness • Category 3: Homeless Under Other Federal Statutes • Category 4: Fleeing/Attempting to Flee DV
	Rapid Re-Housing	<p>Individuals and families defined as “homeless” under the following categories are eligible for assistance in RRH projects:</p> <ul style="list-style-type: none"> • Category 1: Literally Homeless • Category 4: Fleeing/Attempting to Flee DV (if the individual or family is also literally homeless) <p><i>Note: Clients assisted through CoC-RRH programs, which are <u>funded through the CoC</u>, are eligible to receive assistance if the individual or family meet the definition of homeless under all four Categories. <u>(Not currently available through the RNCOC)</u></i></p>
	Homelessness Prevention	<p>Individuals and families defined as “homeless” under the following categories are eligible for assistance in HP projects:</p> <ul style="list-style-type: none"> • Category 2: Imminent Risk of Homelessness • Category 3: Homeless Under Other Federal Statutes • Category 4: Fleeing/Attempting to Flee DV (if the individual or family is NOT also literally homeless)

EXHIBIT D: RECORDKEEPING REQUIREMENTS

HUD RECORDKEEPING REQUIREMENTS	Category 1	Literally Homeless	<ul style="list-style-type: none"> v. Written observation by the outreach worker; <u>or</u> v. Written referral by another housing or service provider; <u>or</u> i. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; i. For individuals exiting an institution-one of the forms of evidence above and: <ul style="list-style-type: none"> o Discharge paperwork <u>or</u> written/oral referral, <u>or</u> o Written record of intake worker’s due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution
	Category 2	Imminent Risk of Homelessness	<ul style="list-style-type: none"> iv. A court order resulting from an eviction action notifying the individual or family that they must leave: <u>or</u> v. For individual and families leaving a hotel or motel-evidence that they lack the financial resources to stay; <u>or</u> vi. A documented and verified oral statement; and vii. Certification that no subsequent residence has been identified; <u>and</u> viii. Self-certification or other written documentation that the individual lack the financial resources and support necessary to obtain permanent housing
	Category 3	Homeless under other Federal Statutes	<ul style="list-style-type: none"> v. Certification by the nonprofit or state or local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute; <u>and</u> vi. Certification of no PH in last 60 days; <u>and</u> vii. Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; <u>and</u> viii. Documentation of special needs <u>or</u> 2 or more barriers.
	Category 4	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> iv. <i>For victim service providers:</i> <ul style="list-style-type: none"> o An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources. Statement must be documented by a self-certification or a certification by the intake worker. • <i>For non-victim service providers:</i> <ul style="list-style-type: none"> o Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-

			<p>certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; <u>and</u></p> <ul style="list-style-type: none">○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u>○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.
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EXHIBIT E: VULNERABILITY INDEX TOOL (VI-SPDAT / VI-F-SPDAT)

The Vulnerability Index Tool allows homeless service providers to assess and prioritize the universe of people who are homeless in a community and identify whom to treat first based on acuity of their needs. It is a brief survey that service providers, outreach workers, and even volunteers can use to determine an acuity score for each homeless person who participates. The scores can then be used to identify and prioritize candidates for different housing interventions based upon their acuity. Using the VI-SPDAT, providers can move beyond only assisting those who present at their particular agency and begin to work together to prioritize all homeless people in the community, regardless of where they are assessed, in a consistent and transparent manner.

To help with the solution of addressing and ending chronic homelessness in rural Nevada, the Rural Nevada Continuum of Care (RNCoC) has implemented the VI-SPDAT as part of the Coordinated Assessment and Referral System, to allow those with the highest vulnerability score to be referred to housing providers for housing vouchers. Case management is provided by homeless service providers located within each community.

The VI-SPDAT Manual for Single Person Households is located at:

<http://www.orgcode.com/wordpress/wp-content/uploads/2014/08/VI-SPDAT-Manual-2014-v1.pdf>

Eligibility Requirements

All potential clients will be screened for the following:

Income – Only households with income **below** 30% of the Area Median Income are eligible for Homelessness Prevention services

PLUS

Trigger Crisis – An event has occurred which is expected to result in housing loss within 30 days due to one of the listed reasons (**See Attachment A** for qualifying trigger crisis)

PLUS

No resources or support network to prevent homelessness – No other options are possible for resolving this crisis. “But for this assistance” this household would become literally homeless-staying in a shelter, a car, or another place not meant for human habitation.

OR

Unaccompanied children and youth who qualify as homeless under another Federal statute – See “Runaway and Homeless Youth Act” definition. (See Attachment B for other definitions of homelessness)

OR

Families with children or youth who qualify as homeless under another Federal statute – See Runaway and Homeless Youth Act definition. (See attachment B for other definitions of homelessness)

PLUS

Score of at least 20 points – or 15-19 points with override sign-off (**See attachment A** for score sheet)

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Attachment A
Homeless Prevention Risk Assessment

Household Name/Identifying Number: _____

Date of Application: _____

1) Household will imminently lose their primary residence and no subsequent residence has been identified **AND** the household lacks the resources or support networks needed to obtain other permanent housing; and household income is **less than** 30% of area median income as defined by HUD for area served.

No **STOP!! Not eligible**

Yes **Continue**

2) Trigger Crisis

Household will lose housing within 30 days due to one of the following (check all that apply):

- _____ Household has moved twice or more in the past 60 days
- _____ Household is living in the home of another person because of economic hardship
- _____ Household has been notified that the right to occupy their current housing or living situation will be terminated within 21 days after date of application
- _____ Household is living in hotel or motel and cost is not paid for by charitable organization or government program for low-income people
- _____ Household is living in SRO or efficiency where more than 2 people live; or in a larger housing unit with more than 2 people per room
- _____ Person is exiting a publicly funded institution or system of care
- _____ Person is exiting a public or privately funded inpatient substance abuse treatment program or transitional housing program
- _____ Household is living in rental housing that is being condemned by a government agency and tenants are being forced to move out

3) Prioritization Scoring

Income Scoring

_____ Rent burden is 66 – 80% of income 5 points **and**

_____ Income at or below 15% AMI 20 points *or*
 _____ Income 16-29% AMI 10 points

4) Tenant Barriers/Risk Factors Scoring

Tally	Screening Barrier	Points per Barrier
_____	Eviction history	1 point
_____	No credit references/has not credit history	1 point
_____	Lack of rental history/has not rented in the past	1 point
_____	Unpaid rent or broken lease in the past (separate from current unpaid rent)	1 point
_____	Poor credit history/late or unpaid bills, excessive debt, etc.	1 point
_____	Past Misdemeanors	1 point
_____	Past Felony other than critical Felonies listed below	1 point
_____	Exiting criminal justice system where incarcerated for less than 90 days	1 point
_____	Critical Felony (drugs, sex crime, arson, crimes against other people)	5 points
_____	Pregnant or has a least one child ages 0-6	5 points
_____	Head of household under 30 years old	5 points
_____	Family experienced literal homelessness in past 3 years	5 points
_____	Adult in household with children	5 points
_____	TOTAL (Tally of Income & Tenant Barriers Scoring)	

Override

If a household has 15 to 19 points but the lead agency believes there is compelling reason to provide homelessness prevention services, the program can document reasons for overriding the score. The override must be signed off by an agency representative at a higher level of authority than direct service staff and documented in the case file.

Attachment B

Other Definitions of Homelessness

- **Runaway and Homeless Youth Act (42 U.S.C. 5701 et seq.)**

Runaway and Homeless Youth is administered by the Family and Youth Services Bureau within the Administration for Children & Families (ACF) of the U.S. Department of Health and Human Services (HHS). Information about the Runaway and Homeless Youth program grantees is available online at:

<http://www.acf.hhs.gov/programs/fysb/programs/runaway-homeless-youth>

- **Head Start Act (42 U.S.C. 9831 et seq.)**

Head Start funding is administered by the Office of Head Start (OHSO) within ACF/HHS. A listing of Head Start programs, centers, and grantees is available online at:

<http://eclkc.ohs.acf.hhs.gov/hslc/HeadStartOffices>

- **Violence against Women Act of 1994; subtitle N (42 U.S.C. 14043e et seq.)**

Violence against Women Act established the Office on Violence against Women (OVW) within the U.S. Department of Justice (DOJ). OVW administers financial and technical assistance to communities across the country that are developing programs, policies, and practices aimed at ending domestic violence, dating violence, sexual assault, and stalking. Currently, OVW administers one formula grant program and eleven discretionary grant programs, all of which were established under VAWA and subsequent legislation. More information about OVW is available online at: <http://www.justice.gov/ovw>

- **Public Health Service Act; section 330 (42 U.S.C. 254b)**

The Public Health Service Act authorizes the Health Center Program, which is administered by the Bureau of Primary Health Care within the Health Resources and Services Administration (HRSA) of HHS. Information about local Health Centers can be found online at: <http://www.bphc.hrsa.gov/index.html>

- **Food and Nutrition Act of 2008 (7 U.S.C. 2011 et seq.)**

Food and Nutrition Act of 2008 relates to the Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps. SNAP is administered by the U.S. Department of Agriculture (USDA). More information about SNAP can be found online at:

<http://www.fns.usda.gov/snap/supplemental-nutrition-assistance-program-snap>

- **Child Nutrition Act of 1966; section 17 (42 U.S.C. 1786)**

Child Nutrition Act of 1966 authorized numerous programs related to school lunches and breakfasts and funds for meals for needy students. For more information about these programs, contact the local School District.

- **McKinney-Vento Act; subtitle B of title VII (42 U.S.C. 11431 et seq.)**

McKinney-Vento Act authorized the McKinney-Vento Education for Homeless Children and Youths Program, which is administered via the Office of Elementary and Secondary Education within the U.S. Department of Education. More information about this program is available online at:

<http://www2.ed.gov/programs/homeless/index.html>. Also contact the local School District's representative.

Attachment C

RURAL NEVADA CONTINUUM OF CARE & STATE EMERGENCY SOLUTIONS GRANT PROGRAM PROGRAM PERFORMANCE EVALUATION TOOL

The following guidelines and program evaluation tool has been developed by the Rural Nevada Continuum of Care (RNCOC) and the State of Nevada Housing Division to determine if programs funded through the RNCOC and the State ESG Program are meeting goals and objectives of the RNCOC.

Federal Performance Goals:

- Reduce lengths of homeless episodes
- Reduce new and return entries into homelessness
- Increase jobs and income

Background

The purpose of the HUD McKinney-Vento homeless assistance programs, as defined by the U.S. Department of Housing and Urban Development (HUD), is to reduce the incidence of homelessness in communities by assisting homeless individuals and families to quickly transition into permanent housing and self-sufficiency, and to assist eligible households who are at imminent risk of homelessness from becoming homeless. It is the expectation of HUD that programs funded through the McKinney-Vento homeless programs be evaluated annually to ensure goals and objectives set by the local CoC are met. In order to be consistent with 402(f) and 413(b) of the McKinney-Vento Act, ESG recipients must also consult with local CoC's in developing performance standards and evaluating outcomes of ESG-assisted projects; and CoC's must in turn analyze patterns of use of ESG funds and help evaluate outcomes for ESG-funded projects.

In the rural Continuum of Care the Governing Board (aka RNCOC Steering Committee) is the decision-making body responsible for the oversight of the RNCOC. The Grantee Peer Review Subcommittee evaluates the quarterly performance of RNCOC Grantees. The RNCOC Evaluation Subcommittee reviews local applications under the leadership of the RNCOC Coordinator (SEI), and provides funding recommendations to the Governing Board, while incorporating information provided by the Grantee Peer Review Subcommittee throughout the year. The State ESG Program Manager is responsible for reporting ESG-related data to the RNCOC Governing Board and the general membership.

Methodology

The RNCOC Governing Board has created goals to help the RNCOC, its grantees, and ESG sub-recipients to meet certain objectives of HUD and the RNCOC. A program review process will be used to evaluate recipient performance with both federal and RNCOC goals. Evaluations will be assessed at least annually, and the timing of the program achievements will work in conjunction with completion of the annual consolidated funding application (the NOFA) to HUD, and the Consolidated Annual Performance Report (CAPER) submitted on behalf of the State ESG program.

The attached Program Performance Evaluation Report will be completed for each McKinney-Vento program funded within the RNCOC. A continuum-wide report will also be completed for all programs funded within the RNCOC. These reports will act as a performance evaluation tool and will indicate program achievement in each of the performance standards outlined below. Achievement of the established performance standard varies as defined by each standard. Points are allocated for each standard ranging from zero to twenty-five points, depending on the Standard. Performance standards will be marked as either "achieved", "not achieved" or "not applicable". Overall program achievement will be assessed based on the percent of all performance standards achieved.

RNCoC-funded programs which meet less than half of the performance standards will be considered “programs of concern” and may be required to develop a 12-month action plan for improving program performance in the area(s) identified as “not achieved”. Programs of concern may be required to provide quarterly progress reports to the RNCoC Governing Board at Steering Committee meetings. The Governing Board will assess the program performance at the end of the 12-month period and will determine if the program is improving in the areas identified and meeting federal and local goals. If the program performance has not improved significantly, as determined by the Governing Board, then the program may be at risk for reallocation or program repurposing during local HUD McKinney-Vento NOFA cycles (beginning with the 2014 NOFA).

State-ESG funded programs which meet less than half of the performance standards may also be considered “programs of concern”. It shall be the responsibility of the State’s ESG Program Manager to develop an action plan with the applicable sub-recipient, as defined under Section 8.0 of the ESG Program’s Policies and Procedures Manual, to ensure the goals and objectives of the ESG and the RNCoC are met. The State’s ESG Program Manager will provide status reports to the RNCoC Governing Board at least annually.

Program Performance Evaluation Report

All data generated for the Program Performance Evaluation Report will be derived from the Homeless Management Information System (HMIS), the RNCoC Recipient’s Annual Performance Report (APR), or ESG reports obtained from the sub-recipient or the State’s ESG Program Manager. Either the RNCoC’s Grantee Peer Review Sub-committee, the RNCoC’s Evaluation Sub-committee, or the State’s ESG Program Manager will work with the HMIS Administrator to obtain the necessary data to generate the Program Performance Evaluation Report.

Reallocations or Repurposing of RNCoC Funding

RNCoC funded programs which meet less than 50% of the performance standards will be considered “programs of concern” and will be required to submit a detailed corrective action plan for improving program performance in the area(s) identified as not achieved. Programs of concern will be evaluated by the RNCoC Evaluation Subcommittee when it is time to consider local applications for possible funding, reallocation or repurposing beginning with the 2014 HUD McKinney-Vento NOFA cycle.

Funding reallocation or repurposing will be determined and recommended by the RNCoC Evaluation Subcommittee as part of the NOFA process. Appeals on the basis of fact may be requested about the decision of the RNCoC Evaluation Subcommittee to reallocate program funding. An appeals review will be held, if necessary, and will be facilitated by the RNCoC Governing Board. (If a member of the Board is also a recipient of CoC funding they will recuse themselves from the appeals process.) The decision of the appeals review will be considered final. Funding reallocation would be contingent on HUD approval during the annual consolidated funding application process.

Program repurposing will be recommended by the RNCoC Evaluation Subcommittee, and determine by a vote by the RNCoC Governing Board. Program repurposing will be recommended if a program is not performing up to the federal and local expectations and if there is an opportunity to improve performance and meet local and federal needs by changing the program model. Repurposing would mean working with the program and the local HUD office to reclassify the program from one program model to another. For example, a transitional housing program could be converted, or repurposed, to become an emergency shelter program a permanent housing program, or a rapid re-housing program. The RNCoC Evaluation

Subcommittee would work closely with the program staff and the local HUD office on the repurposing plan and the timeline for completion of the program repurposing. Program repurposing would be contingent on HUD approval during the annual consolidated funding application process.

Scoring Factors and Points Available

Factor	Points
1. Program serves “hard to serve” homeless population	25 (All participants)
2. Reduce length of homeless episodes and new and returned entries into homelessness	15 (RNCOC) 35 (ES) 5 (HP & RRH)
3. Increase jobs, income and self-sufficiency	35 (RNCOC/HP/RRH) 15 (ES Only)
4. HMIS participation/Data Quality	15 (All participants)
5. Timely disbursement of funds	10 (All participants)
6. Families designated as homeless under other Federal programs	10 (HP programs only)
7. Priority households served	10 (RRH only)
Total Available	100

35 point scale distribution	25 point scale distribution	10 point scale distribution	5 point scale distribution
35 points = 95-100% achieved	25 points = 95-100% achieved	10 points = 95-100% achieved	5 points = 91-100% achieved
34 points = 90-94% achieved	24 points = 90-94% achieved	9 points = 90-94% achieved	4 points = 81-90% achieved
32 points = 85-89% achieved	22 points = 85-89% achieved	8 points = 85-89% achieved	3 points = 71-80% achieved
30 points = 80-84% achieved	20 points = 80-84% achieved	7 points = 80-84% achieved	2 points = 61-70% achieved
28 points = 75-79% achieved	18 points = 75-79% achieved	6 points = 75-79% achieved	1 point = 51-60% achieved
26 points = 70-74% achieved	17 points = 70-74% achieved	5 points = 70-74% achieved	0 points = 0-50% achieved
23 points = 65-69% achieved	16 points = 65-69% achieved	4 points = 65-69% achieved	
20 points = 60-64% achieved	15 points = 60-64% achieved	3 points = 60-64% achieved	
15 points = 55-59% achieved	14 points = 55-59% achieved	2 points = 55-59% achieved	
10 points = 50-54% achieved	13 points = 50-54% achieved	1 point = 0-49% achieved	
0 = 0-49% achieved	= 12 points = 0-49% achieved	0 points = 0-49% achieved	
		Outcome Achievement:	
		Outcome achieved = Y	

		Outcome not achieved = N	
		Outcome measure not applicable =N/A	

RURAL NEVADA CONTINUUM OF CARE and STATE ESG PROGRAM	
OBJECTIVES AND OUTCOMES SUMMARY	
Objective #1	Grantees shall assist “harder to serve” homeless populations
Outcome #1	All programs: Homeless PERSONS served will be “harder to serve” populations, having one or more of the following issues: Mental Illness, Alcohol Abuse, Drug Abuse, Chronic Health Conditions, HIV, Developmental Disabilities, Physical Disabilities, Domestic Violence, Unaccompanied Youth under age 18, or Unaccompanied TAY age 18-24 years
Performance Measures	<i>At least 50% of PERSONS served by program will be” harder to serve” homeless</i>
Objective #2	Grantees shall reduce length of homeless episodes, and new and returned entries into homelessness
Outcome #2(a)	PH program only: Homeless PERSONS will stay in PH over six months
Outcome #2(b)	TH program only: Homeless PERSONS in TH will exit to PH
Outcome #2(c)	TH Program only: Average days from program entry to exit into PH will be reduced year to year
Performance Measures	
Outcome #2(a)	<i>At least 80% of homeless PERSONS in PH stay over 6 months</i>
Outcome #2(b)	<i>At least 80% of homeless PERSONS in TH move to PH</i>
Outcome #2(c)	<i>(To be determined. Baseline year)</i>
ESG Program Only	
Outcome #2(d)	Shelters only: Homeless PERSONS will exit from shelter into TH or PH upon discharge

Outcome #2(e)	Shelters only: PERSONS exited into TH or PH stayed less than 45 days in shelter
Outcome #2(f)	Rapid Re-Housing (RRH) only: Homeless PERSONS were provided access to PH
Outcome #2(h)	Homeless Prevention (HP) only: HOUSEHOLDS where stabilized and diverted from shelters
Performance Measures	
Outcome #2(d)	<i>ES: At least 10% of homeless PERSONS are placed into TH or PH upon discharge from shelter</i>
Outcome #2(e)	<i>ES: 20% of shelter PERSONS exiting into PH or TH stayed less than 45 days in the shelter</i>
Outcome #2(f)	<i>RRH: At least 80% of PERSONS placed in PH will remain after 6 months from exit</i>
Outcome #2(g)	<i>HP: At least 80% of PERSONS did not become homeless within 6 months of program exit</i>
Objective #3	Grantees shall increase jobs, income and self-sufficiency of program participants
Outcome #3(a)	All programs except ES: ADULTS in the household will have increased or sustained employment income; OR
Outcome #3(b)	All programs except ES: ADULTS in the household will have increased or sustained other cash income (not including ES clients); OR
Outcome #3(c)	All programs except ES: ADULTS in the household will have increased or sustained mainstream non-cash benefits ; OR
Outcome #3(d)	All programs except ES: PERSONS shall have improved education by program exit
Outcome #3(e)	ES only: Homeless ADULTS residing in shelters shall have increased income from all sources (employment, benefits, mainstream resources)
Performance Measures	
Outcome #3(a)	<i>At least 20% of ADULTS will have increased or sustained employment income; OR</i>
Outcome #3(b)	<i>At least 54% of ADULTS will have increased or sustained other cash income; OR</i>
Outcome #3(c)	<i>At least 56% of ADULTS will have increased or sustained mainstream non-cash benefits; OR</i>
Outcome #3(d)	<i>At least 10% of ADULTS will have improved education by program exit</i>

Outcome #3(e)	<i>At least 20% of homeless ADULTS residing in shelters will increase income from all funding sources.</i>
Objective #4	<i>Grantees comply with HMIS data quality standards</i>
Outcome #4(a)	<i>All programs:</i> Percentage of PERSONS in housing and utilizing shelter beds who exit to known destinations
Outcome #4(b)	<i>All programs:</i> Income data ADULTS will be collected at program entry and exit, and is updated at least annually
Outcome #4(c)	<i>All programs:</i> Limit # of DATA ELEMENTS with “Don’t Know” and/or “Refused”
<i>Performance Measures</i>	
Outcome #4(a)	<i>At least 90% of PERSONS who exit programs will have “known destinations” fields completed</i>
Outcome #4(b)	<i>At least 90% of ADULTS will have income data collected at program entry and exit and updated at least annually</i>
Outcome #4(c)	<i>No more than 10% of DATA ELEMENTS reflect “Don’t Know”, “Refused” or “Missing” as entries</i>
Objective #5	<i>Timely disbursement of grant funds</i>
Outcome #5	<i>All Programs:</i> Grantee and ESG sub-recipients submit draw reimbursements at least quarterly and are on target to spend funds by end of grant period
Performance Measure	<i>95% of the time grantee and ESG sub-recipients submit quarterly draw reimbursement request by the due date</i>
<i>ESG Program Only</i>	
Objective #6	<i>Assist families and youth defined as homeless under other Federal Programs</i>
Outcome #6	<i>HP only:</i> Percentage of HOUSEHOLDS served shall meet the definition of homeless under other Federal Programs
Performance Measure	<i>At least 50% of HOUSEHOLDS provided HP assistance met the definition of homeless under other Federal programs</i>
Objective #7	<i>Provide assistance to priority households</i>
Outcome #7(a)	<i>RRH only:</i> A portion of HOUSEHOLDS provided access to RRH will be homeless families with children

Outcome #7(b)	RRH only: Homeless veterans shall be provided access to TH or PH
Performance Measure Outcome 7(a)	<i>At least 25% of HOUSEHOLDS provided access to RRH will be homeless families with children</i>
Outcome 7(b)	<i>25% of homeless veterans served will be provided access to transitional or permanent housing</i>
Bonus Points: Additional requirements to be reviewed annually (RNCoC grantees will be reviewed prior to the NOFA. ESG sub-recipients will be reviewed at application and at year end for CAPER reporting)	
Objective #8	ES/TH/PH only: Increase utilization of available ES, TH and PH beds
Outcome #8	ES/TH/PH only: Bed utilization rates shall be greater than 65% and no more than 105%
Performance Measure	<i>Average utilization rate for transitional, permanent and emergency shelter beds is not less than HUD's standard of 65%, and does not exceed HUD's standard of 105%</i>
Objective #9	All Programs: Integration with local Continuums of Care
Outcome #9	RNCoC grantees and ESG sub-recipients shall attend local Continuum of Care meetings
Performance Measure	<i>RNCoC grantees and ESG sub-recipients shall attend at least 75% of all local CoC meetings held annually</i>
Objective #11	All Programs: Collaboration efforts
Outcome #11	RNCoC grantees and ESG sub-recipients shall obtain sufficient cash and non-cash funds to meet match requirements for the CoC and ESG programs
Performance Measure	<i>RNCoC Grantees shall obtain at least 25% match for programs funded through the CoC. ESG sub-recipients shall provide enough match to cover at least 100% of the ESG allocation</i>
Objective #12	Coordination efforts
Outcome #12(a)	RNCoC grantees and ESG sub-recipients shall engage other community partners to address issues of homelessness

Outcome #12(b)	Program participants shall be provided access and referrals to available resources
Performance Measure Outcome #12(a)	<i>RNCoC grantees and ESG sub-recipients shall participate in at least 4 local Workforce Investment Boards or Community Coalition meetings annually</i>
Outcome #12(b)	<i>RNCoC grantees and ESG sub-recipients shall participate in local coordinated assessment and referral systems in order to provide program participants with access to other available resources</i>
Objective #13	Discharge Planning
Objective #13	RNCoC Grantees and ESG sub-recipients shall oversee local efforts to develop community-wide discharge plans
Performance Measure	<i>RNCoC Grantees and ESG sub-recipients shall participate in community discharge planning initiatives that is documented via executed MOU's with other participating agencies</i>

Rural Nevada Continuum of Care

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State Emergency Solutions Grant Program

Performance Evaluation Form

Agency Name: _____

Program Name: _____

Program Type: Permanent Transitional ESG

Amount Funded: _____

Total # of ES/TH/PH Beds _____ Date of Assessment: _____

Monitored

by: _____

Goal	Performance Measure	Data	Points Available <i>(refer to instructions on page 2)</i>	Actual Points	Achieved Y N or N/A <i>(N/A will receive full score)</i>
Project serves "harder to serve" homeless populations	<p>All Programs: Select all "Harder to Serve" homeless or at-risk of homeless populations served:</p> <p><input type="checkbox"/> Mental Illness</p> <p><input type="checkbox"/> Alcohol Abuse</p> <p><input type="checkbox"/> Drug Abuse</p> <p><input type="checkbox"/> Chronic Health Conditions</p> <p><input type="checkbox"/> HIV</p> <p><input type="checkbox"/> Developmental Disabilities</p> <p><input type="checkbox"/> Physical Disabilities</p> <p><input type="checkbox"/> Domestic Violence</p>	<p>HMIS, APR</p>	<p>50% of persons in program meet any <u>one</u> criteria = 15</p> <p>50% of persons in program meet any <u>two</u> Criteria = 20</p> <p>50% of persons in program meet any <u>three</u> criteria = 25</p>		

	<input type="checkbox"/> Unaccompanied Youth to 18 <input type="checkbox"/> Unaccompanied TAY age 18-24				
Reduce length of homeless episodes and new and return entries into homelessnes s	Permanent Housing (PH) only: At least 80% of homeless PERSONS in PH stay over six months.	HMIS, APR	15		
	Transitional Housing (TH) only: At least 80% of homeless PERSONS in TH move to PH	HMIS, APR	15		
	TH only: Average days from program entry to exiting into PH	HMIS APR	Baseline year		
	Emergency Shelter (ES) only: At least 10% of homeless PERSONS are placed into transitional or permanent housing upon discharge from shelter	HMIS	15		
	(NEW) ES Only: 20% of homeless PERSONS exited into TH or PH, shelter stay was less than 45 days	HMIS	20		
	Rapid Re-Housing (RRH) only: At least 80% of homeless PERSONS placed in permanent housing remain in that housing at least 6 months after program exit	HMIS	5		
	Homeless Prevention (HP) only: At least 80% of PERSONS did not become homeless within 6 months after program exit	HMIS	5		
Increase jobs, income	All programs except ES: At least 20% of ADULTS will have increased or sustained employment income; or	HMIS, APR	50% of persons in program meet any <u>one</u> criteria = 15		

and self-sufficiency	All programs except ES: At least 54% of ADULTS will have increased or sustained other cash income. or	HMIS, APR	50% of persons in program meet any <u>two</u>		
	All programs except ES: At least 56% of ADULTS will have increased or sustained mainstream non-cash benefits; or	HMIS, APR	Criteria = 20 50% of persons in program meet any <u>three</u> criteria = 25		
	All programs except ES: At least 10% of PERSONS will have improved education	HMIS, APR	50% of persons in program meet any <u>four</u> criteria = 35		
	ES only: At least 20% of ADULTS residing in emergency shelters increased income from all sources	HMIS	15		
HMIS Data Quality	All programs: At least 90% of PERSONS in housing and utilizing shelter beds who exit programs will have “known destinations” fields completed	HMIS	5		
	All programs: At least 90% of ADULTS have Income Data updated at least annually, and at entry and exit	HMIS, APR	5		
	All programs: No more than 10% of DATA ELEMENTS reflect “Don’t Know”, “Refused”, or “Missing” as entries	HMIS	5		
Timely disbursement of grant funds	All programs: 95% of the time Grantee and ESG sub-recipients submit quarterly draw reimbursement requests by the due date	Manual Report	95% -100 % = 10 80% - 95% = 5 < 80% = 0		
ESG Program Only					

Families and youth defined as homeless under other Federal programs	HP only: At least 50% of HOUSEHOLDS served met the definition of homeless under other Federal programs	HMIS	10		
Priority Households served	RRH only: At least 25% of HOUSEHOLDS provided access to housing will be homeless families with children	HMIS	5		
	RRH only: 25% of homeless participants served will be veterans who are provided access to transitional or permanent housing	HMIS	5		
Total Outcome Achievement			100		
Points Available					
Points may be deducted with a history of grant funds returned to HUD, or who are currently at risk of recapture of grant funds. (maximum of 10)			Points Deducted		
			Total Points Awarded		
Programs which meet less than 50% of performance standards will be considered "programs of concern"			Program		
Performance Percentage					
BONUS – Additional requirements to be reviewed annually (RNCOC grantees will be reviewed prior to the NOFA. ESG sub-recipients will be reviewed at application and at year end for CAPER reporting)					
(NEW) Increase utilization of available beds	(NEW) ES/TH/PH only: Average utilization rate for transitional, permanent and emergency shelter beds is no less than 65%, and not more than 105%	HMIS	90% - 100% = 5 80% - 89% = 3 65% - 80% = 1 <65% = 0		

			>105% = 0		
Integration with local Continuums of Care	RNCoC grantees & ESG sub-recipients attend at least 75% of Continuum of Care meetings held annually	Manual Report	5		
Collaboration efforts to obtain additional resources	RNCoC grantees and ESG sub-recipients meet match requirement of 25% for CoC and 100% for ESG	Manual Report	101% and above = 5 95% - 100% = 3 85%- 94% = 2 < 85% = 0		
Coordination efforts	RNCoC grantees and ESG sub-recipients participate in at least 4 local Workforce Investment Boards or Community Coalition meetings; and RNCoC grantees and ESG sub-recipients participate in local coordinated assessment and referral systems	Manual Report	3 7		
Discharge Planning	RNCoC grantees and ESG sub-recipients participate in community discharge plans; documented by executed MOU's with at least 2 participating agencies	Manual Report	5		
BONUS POINTS			130		
			Maximum Points		

Program of Concern: Yes/No

Recommendations for Improvement:

DRAFT

DRAFT

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**With the State of Nevada Housing Division and
the State of Nevada Health Division**

For the U.S. Department of Housing and Urban Development (HUD)