

St. Louis County
Draft Amendments to the
FY 2011 and FY 2012 Action Plans
For the
Emergency Solutions Grant Program
April 2, 2012

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I. Introduction

St. Louis County is amending its Fiscal Year 2011 and Fiscal Year 2012 Action Plans to comply with requirements for use funding from the new Emergency Solutions Grant Program. The Emergency **Shelter** Grant Program underwent revisions through federal legislation known as the Homeless Emergency Assistance and Rapid Transition to Housing Act or HEARTH. The revisions included change of program name to the Emergency **Solutions** Grant Program and change of eligible activities similar to those eligible under the Homeless Prevention and Rapid Re-housing Program (HPRP).

The Action Plans were submitted to the U.S. Department of Housing and Urban Development (HUD) on March 14, 2011 and March 14, 2012 respectively. The County will receive \$60,203 in FY 2011 and \$190,582 in FY 2012 Emergency Solutions Grant Program funds that constitute a total allocation of \$250,785.

On November 15, 2011, the U.S. Department of Housing and Urban Development (HUD) posted the interim rule for the Emergency Solutions Grants program and Consolidated Plan conforming amendments (Interim Rule) on HUD's Homelessness Resource Exchange website at www.hudhre.info. On December 5, 2011, the Interim Rule was published in the Federal Register (see 76 FR 75954). Also, on November 15, 2011 HUD announced the amounts of the second allocation of FY 2011 Emergency Shelter Grants program/Emergency Solutions Grants program funds. To receive the Emergency Solutions Grant funds, the County must submit substantial amendments to its FY 2011 and FY 2012 Consolidated Plan Annual Action Plans to HUD by May 15, 2012.

This Notice advises recipients of the 24 CFR part 91 requirements that apply to substantial amendments, highlights the relevant changes under the Interim Rule, and provides guidance on critical decisions to be made in the planning process.

II. Citizen Participation and Public Comments

In accordance with 24 CFR 91.105(c)(3) for local governments and territories, Public Notice of the amendments for the use of ESG funds was released for public review and comments on April 2, 2012. During the 30-day public comment period from April 2, through May 3, 2012, the Draft ESG Amendments were made available to the public at St. Louis County Planning and Community Development offices in Duluth and Virginia and the St. Louis County Internet site at www.stlouiscountymn.gov.

Following the 30-day public comment period, the St. Louis County Board of Commissioners will hold a public hearing on May 8, 2012 to review the public comment to the amendments. The St. Louis County Board is anticipated to then approve the FY 2011 and FY 2012 Action Plan Amendments for submission to HUD.

Notice for the 30-day public comment period is presented in Appendix A. Notice of the public hearing is presented in Appendix B. Summary of public comments received during the 30-day public comment period and the public hearing and responses to these public comments are presented in Appendix C. Resolution of the St. Louis County Commissioners appears in Appendix D.

The substantial amendments are prepared and submitted in accordance with the St. Louis County Citizen Participation Plan for federal entitlement funding and the requirements of 24 CFR Part 91, as amended by the Interim Rule.

III. Consultation

St. Louis County has a comprehensive and coordinated Continuum of Care strategy that includes participation of communities, County Departments, community service providers, and other community groups including non-profits, state and federal agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools and other stakeholders.

In addition, St. Louis County has developed a comprehensive homelessness plan, Heading Home St. Louis County—A Ten Year Plan to End Homelessness (the Plan), adopted by the St. Louis County Board and Duluth City Council. The Plan is directed by the Heading Home St. Louis County Leadership Council. The Plan outlines the key goals and strategies necessary to eliminate homelessness in St. Louis County and includes strategies to increase and improve the efficacy of the current systems of housing and services for the homeless. The strategies strive to coordinate housing with case management and skills training to create future housing stability for clients.

St. Louis County has two distinct geographic service areas; the city of Duluth, and the remaining rural areas outside Duluth. The rural areas include smaller cities and townships spread throughout the County. The Continuum of Care process involves two groups that represent these areas. The Affordable Housing Coalition (AHC) is made up of agencies and community representatives from Duluth, and the Rural Housing Coalition (RHC) is made up of agencies and community representatives from the rural areas of the county. The AHC and RHC meet monthly and provide input to gaps in homeless services, unmet needs, and priorities. St. Louis County Public Health and Human Services Department (PHHS) staff also attends these meetings. The AHC and RHC input flows to the Heading Home Leadership Council to shape allocation of homeless funding, performance measurement, funding policy, procedures, and data collection through the Homeless Management Information System (HMIS).

St. Louis County requires all agencies receiving Continuum of Care, CDBG, and ESG funding to participate in HMIS. The Ten Year Plan also prioritizes common client assessment, coordinated client referral, and enhanced data collection across the system of care for homeless individuals and families.

IV. Summary of Consultation Process

The St. Louis County Public Health and Human Services Department (PHHS) facilitates the County Continuum of Care process. The County consulted with the Continuum of Care agencies, the Affordable Housing Coalition, and the Rural Housing Coalition to plan for the FY 2011 and FY 2011 ESG allocations. These groups assist the County to:

- Coordinate services across the jurisdiction by developing and utilizing standardized eligibility and assessment tools
- Support federal, state, and St. Louis County goals for priority populations
- Develop performance standards, funding policy and procedures
- Review HMIS data and promote enhanced HMIS usage and development

PHHS provides the collective input from this process to the Heading Home St. Louis County Leadership Council as the administering body of the Ten Year Plan. The Leadership Council assures alignment of proposed ESG activities with the goals and strategies outlined in the Plan.

St. Louis County requires all public service projects and activities providing services to homeless individuals and families to actively participate in the Homeless Management Information System (HMIS). The Ten Year Plan also prioritizes the strengthening of data collection and participation across the system of care for homeless individuals and families.

V. Match

Organizations must match ESG funds at minimum of 100% from non-ESG sources. Agencies submit documentation of ESG match funding as part of the annual ESG application process. Matching funds must be provided after the date of the grant award. Funds used to match a previous ESG activity may not be used to match a subsequent grant award. Applicants may use any of the following as sources of match: cash; the value or fair rental value of any donated material or building; the value of any lease on a building; salary paid to staff to carry out the program; and the value of time and service contributed by volunteers to carry out the program.

VI. Proposed Activities and Overall Budget

A. Proposed Activities

1. Priority Needs: The Heading Home St. Louis County–A Ten Year Plan to End Homelessness established the following four broad goals:
 - a. Prevent new occurrences of homelessness
 - b. Shorten length of homelessness and rapidly re-house in the most permanent arrangement
 - c. Expand access points to housing and services
 - d. Increase supports needed to maintain housing
2. Concise description of the activity, including the number and types of persons to be served

The County intends combine the FY 2011 second allocation and the FY 2012 allocation in one application process. Eligible activities will include emergency shelter, street outreach/essential services, rapid re-housing, homeless prevention, Homeless Management Information System participation (HMIS), and necessary administrative costs. Specific activity awards and corresponding performance measurement outcomes will be established through the application submission, review, and recommendation process outlined previously.

St. Louis County does not intend to use FY 2011 ESG second allocation funding for additional FY 2011 emergency shelter or street outreach/essential services activities.

3. Corresponding standard objective and outcome categories

Performance measurement for the Emergency Solutions Grant allocations is included in St. Louis County's Summary of Specific Objectives - Combined Table 1C_2C of the respective FY 2011 and FY 2012 Action Plans. ESG activities are reported in the tables as follows:

- Primary Objective: Suitable Living Environment
- Outcome: Availability/Accessibility
- Performance Indicator: Persons Assisted
- Specific Objective #: SL-1.1

4. Start date and completion date

Anticipated start date upon execution of grant agreement with HUD and ending 18 months from that date.

5. ESG and other funding amounts

The FY 2011 Emergency Solutions Grant allocation will be used for prevention and rapid re-housing activities. The FY 2012 allocation will be used for street outreach, prevention, rapid re-housing, and HMIS data collection.

6. One or more performance indicators

Persons assisted

7. Projected accomplishments, in accordance with each indicator, to be made within one year

To be determined by funding award process.

8. Projected accomplishments, in accordance with each performance indicator

To be determined by funding award process.

B. Discussion of Funding Priorities

The Homelessness Prevention and Rapid Re-housing Program (HPRP) provided greater flexibility to assist clients within the Continuum of Care than previous funding sources. Lessons learned from HPRP include the need for greater prevention funding and its value both for clients and longer-term cost savings for the CoC. HPRP experience with use of a common assessment tool will also be maintained with the ESG funding.

St. Louis County has worked collaboratively to coordinate creation of the Heading Home St. Louis County-Ten Year Plan to End Homelessness. This effort involved County agencies that serve the homeless, a public/private working group, and many other critical stakeholders. Components of this

plan include homeless prevention, emergency shelter, and rapid re-housing. The Plan is reflective of best practices and policies across the nation and of those included in the Federal Strategic Plan to Prevent and End Homelessness.

Funding priorities are determined through the collaborative process discussed previously under Consultation in Section III.

C. Detailed Budget

FY 2011 and FY 2012 Detailed Budget Table 3s are attached in Appendix E.

VII. Written Standards for Provision of ESG Assistance

- A. Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.
- B. Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.
- C. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance. All program participants are already literally homeless and will only be using rapid re-housing assistance.
- D. Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.
- E. Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.
- F. Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participants receives assistance; or the maximum number of times the program participants may receive assistance.

St. Louis County Standards for Provision of ESG Assistance Response:

St. Louis County, in collaboration with the Heading Home Leadership Council, will utilize assessment and evaluation instruments developed through the consultation process outlined previously under Consultation in Section III. St. Louis County convenes the Leadership Council and will assure the ongoing effectiveness of the program's design and standards. In addition, the County will assure that ESG-funded agencies comply with program eligibility and verification requirements including HMIS.

ESG-funded agencies will conduct an initial client intake using a common assessment tool to verify program eligibility and determine the level of client need. The common assessment tool assists with client referral and agency performance measurement. In order to be eligible for the program, clients must be homeless based upon HUD definition of homeless. A client must be at or below 50% of Area Median Income as defined by HUD. ESG-funded agencies will complete income verification forms and maintain client files with program eligibility documentation.

VIII. Describe Process for Making Sub-awards

St. Louis County will conduct a competitive request for proposal (RFP) process utilizing a common application. Applications will be reviewed by County Departments, the Heading Home Leadership Council, the Affordable Housing Coalition, and the Rural Housing Coalition. Funding recommendations will be made by the Heading Home Leadership Council in consultation with St. Louis County Departments after input from the AHC and RHC, which is consistent with the Continuum of Care funding process. The Leadership Council recommendation will be provided to the St. Louis County Board of Commissioners for authorization to contract with recommended agencies.

IX. Homeless Participation Requirement

St. Louis County has a comprehensive and coordinated Continuum of Care strategy that includes participation of communities, County Departments, community service providers, and other community groups including non-profits, state and federal agencies, faith-based organizations, the homeless and formerly homeless, interested business leaders, schools and other stakeholders. The Affordable Housing Coalition, Rural Housing Coalition, and Heading Home Leadership Council include homeless or formerly homeless persons.

X. Performance Standards

The St. Louis County ESG allocations will compliment and contribute to the CoC system through the County's alignment of the ESG funding process with the Continuum of Care funding process discussed previously.

XI. Certifications

- A. Written standards required for recipients who are eligible and decide to use part of the second allocation of FY 2011 funds for emergency shelter and street outreach activities.

Not applicable: the FY 2011 second allocation will be used for prevention and rapid re-housing activities only.

B. Requirements for recipients who plan to use the risk factor under paragraph (1) (iii) (G) of the “at risk of homelessness” definition

Not applicable.

C. Requirements for Optional Changes to the FY 2011 Annual Action Plan

1. Centralized or Coordinated Assessment System

The St. Louis County Continuum of Care does not use a centralized assessment system but did use a common assessment tool with HPRP funding. A common assessment tool will also be used by agencies funded with ESG.

2. Monitoring

St. Louis County will monitor the grant activities carried out by ESG-funded agencies using the goals and objectives of the Consolidated Plan and the Continuum of Care to assure long term compliance with program requirements. St. Louis County will conduct ongoing monitoring to assure program expenditure goals and requirements are met in accordance with HUD guidelines.

XII. Required Contents of Substantial Amendments

Appendix F contains the ESG Certifications and SF-424s.

Appendix A: Public Notice of 30-Day Comment Period
To FY 2011 and FY 2012 Action Plan Amendments
For the Emergency Solutions Grant Program

PUBLIC NOTICE

St. Louis County will receive public comment on amendments to its FY 2011 and FY 2012 Action Plans for proposed use of Emergency Solutions Grant funding from the U.S. Department of Housing and Urban Development (HUD).

Copies of the draft amendments are available at the St. Louis County Planning and Community Development Departments located at 307 1st Street South, Suite 117, Virginia, MN, and 100 Missabe Building, 227 West 1st Street in Duluth, MN, and on the County's website at:
www.stlouiscountymn.gov .

The public comment period is from April 2, 2012, through May 3, 2012. Comments may be transmitted via mail, fax, phone, or e-mail to: Steve Nelson, 307 South 1st Street, Suite 117, Virginia, MN 55792, 218-742-9561, fax 218-749-7194, or nelsonst@stlouiscountymn.gov.

Appendix B: Public Hearing Notice of the FY 2011 and FY 2012 Action Plan Amendments
For the Emergency Solutions Grant Program

The public hearing is anticipated to take place on Tuesday, May 8, 2012 prior to the regularly scheduled meeting of the St. Louis County Board of Commissioners.

Notice of the public hearing will be published in the Duluth News Tribune after authorization by the St. Louis County Board. Setting of the public hearing is on the Committee of the Whole agenda for the April 3, 2012 meeting and is expected to move forward for Board approval at the April 10, 2012 meeting.

Appendix C: Public Comments to FY 2011 and FY 2012 Action Plan Amendments
For the Emergency Solutions Grant Program

Public comments received and St. Louis County responses will be entered after completion of the 30-day public comment period and public hearing.

Appendix D: Resolution of the St. Louis County Board of Commissioners
To adopt the FY 2011 and FY 2012 Action Plan Amendments
For the Emergency Solutions Grant Program

A copy of the resolution will be attached after its adoption by the County Board.

Appendix E: Table 1 and Table 3
To FY 2011 and FY 2012 Action Plan Amendments
For the Emergency Solutions Grant Program

Table 1: Declaration of FY 2010 Emergency Shelter Grant Budget

Activity Type	Obligated Amount
Essential Services/Street Outreach	25,888
Homeless Prevention	31,960
Shelter Operations	43,575
Administration	5,113
Total	106,536

Table 3

FY 2011 Detailed Budget Table					
First Allocation	\$107,028.00	FY 2011 Emergency Shelter Grants/Emergency Solutions Grants Program Allocations			
Second Allocation	\$60,203.00				
Grant Amount	\$167,231.00				
Total Administration	\$12,542.33				
		First Allocation		Second Allocation	Total Fiscal Year 2011
	Eligible Activities	Activity Amount	Reprogrammed Amount	Activity Amount	Activity Amount
Emergency Shelter Grants Program	Homeless Assistance	\$69,878.00	\$0.00		\$69,878.00
	<i>Rehab/Conversion</i>	\$0.00			\$0.00
	<i>Operations</i>	\$44,478.00			\$44,478.00
	<i>Essential Services</i>	\$25,400.00			\$25,400.00
	Homelessness Prevention	\$31,800.00			\$31,800.00
	Administration	\$5,350.00			\$5,350.00
	Emergency Shelter Grants Subtotal	\$107,028.00	\$0.00		\$107,028.00
Emergency Solutions Grants Program	Emergency Shelter**			\$0.00	\$0.00
	<i>Renovation**</i>			\$0.00	\$0.00
	<i>Operation**</i>			\$0.00	\$0.00
	<i>Essential Service**</i>			\$0.00	\$0.00
	<i>URA Assistance**</i>			\$0.00	\$0.00
	Street Outreach - Essential Services**			\$0.00	\$0.00
	HMIS				\$0.00
	Rapid Re-housing ¹		\$0.00	\$30,000.00	\$30,000.00
	<i>Housing Relocation and Stabilization Services</i>				\$0.00
	<i>Tenant-Based Rental Assistance</i>				\$0.00
	<i>Project-Based Rental Assistance</i>			\$0.00	\$0.00
	Homelessness Prevention ¹		\$0.00	\$23,011.00	\$23,011.00
	<i>Housing Relocation and Stabilization Services</i>				\$0
	<i>Tenant-Based Rental Assistance</i>				\$0
	<i>Project-Based Rental Assistance</i>				\$0.00
	Administration			\$7,192.00	\$7,192.00
		Emergency Solutions Grants Subtotal		\$0.00	\$60,203.00
		Total Grant Amount:			\$167,231.00

**Allowable only if the amount obligated for homeless assistance activities using funds from the first allocation is less than the expenditure limit for emergency shelter and street outreach activities (see Section III.B. of this Notice).

¹Funding amounts are estimates. Actual activity funding will be determined through the application process identified in the substantial amendment.

CERTIFICATIONS

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

Affirmatively Further Fair Housing -- The jurisdiction will affirmatively further fair housing, which means it will conduct an analysis of impediments to fair housing choice within the jurisdiction, 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.

Anti-displacement and Relocation Plan -- It will comply with the acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, and implementing regulations at 49 CFR 24; and it has in effect and is following a residential antidisplacement and relocation assistance plan required under section 104(d) of the Housing and Community Development Act of 1974, as amended, in connection with any activity assisted with funding under the CDBG or HOME programs.

Drug Free Workplace -- It will or will continue to provide a drug-free workplace by:

1. Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
2. Establishing an ongoing drug-free awareness program to inform employees about -
 - (a) The dangers of drug abuse in the workplace;
 - (b) The grantee's policy of maintaining a drug-free workplace;
 - (c) Any available drug counseling, rehabilitation, and employee assistance programs; and
 - (d) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
3. Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph 1;
4. Notifying the employee in the statement required by paragraph 1 that, as a condition of employment under the grant, the employee will -
 - (a) Abide by the terms of the statement; and
 - (b) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;
5. Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph 4(b) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

6. Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph 4(b), with respect to any employee who is so convicted -
 - (a) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or
 - (b) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;
7. Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs 1, 2, 3, 4, 5 and 6.

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

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

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

Consistency with plan -- The housing activities to be undertaken with CDBG, HOME, ESG, and HOPWA funds are consistent with the strategic plan.

Section 3 -- It will comply with section 3 of the Housing and Urban Development Act of 1968, and implementing regulations at 24 CFR Part 135.

Barbara Hayden, Director

St. Louis County
Planning and Community Development

ESG Certifications

The Emergency Solutions Grants Program Recipient certifies that:

Major rehabilitation/conversion – If an emergency shelter’s rehabilitation costs exceed 75 percent of the value of the building before rehabilitation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed rehabilitation. If the cost to convert a building into an emergency shelter exceeds 75 percent of the value of the building after conversion, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 10 years after the date the building is first occupied by a homeless individual or family after the completed conversion. In all other cases where ESG funds are used for renovation, the jurisdiction will maintain the building as a shelter for homeless individuals and families for a minimum of 3 years after the date the building is first occupied by a homeless individual or family after the completed renovation.

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

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

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

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

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

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

Consolidated Plan – All activities the jurisdiction undertakes with assistance under ESG are consistent with the jurisdiction’s consolidated plan.

Discharge Policy – The jurisdiction will establish and implement, to the maximum extent practicable and where appropriate policies and protocols for the discharge of persons from

publicly funded institutions or systems of care (such as health care facilities, mental health facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent this discharge from immediately resulting in homelessness for these persons.

Barbara Hayden, Director

St. Louis County

Planning and Community Development

APPENDIX TO CERTIFICATIONS

INSTRUCTIONS CONCERNING LOBBYING AND DRUG-FREE WORKPLACE REQUIREMENTS:

A. Lobbying Certification

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

B. Drug-Free Workplace Certification

1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification.
2. The certification is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HUD, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.
3. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.
4. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio stations).
5. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see paragraph three).
6. The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

307 South 1st Street, Suite 117
Virginia, MN 55792

Check if there are workplaces on file that are not identified here.

This information with regard to the drug-free workplace is required by 24 CFR part 21.

7. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

**APPLICATION FOR
FEDERAL ASSISTANCE**

Version 7/03

1. TYPE OF SUBMISSION: Application <input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		2. DATE SUBMITTED		Applicant Identifier					
		3. DATE RECEIVED BY STATE		State Application Identifier					
<input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		<input type="checkbox"/> Construction <input type="checkbox"/> Non-Construction		4. DATE RECEIVED BY FEDERAL AGENCY		Federal Identifier			
5. APPLICANT INFORMATION									
Legal Name:				Organizational Unit:					
				Department:					
Organizational DUNS:				Division:					
Address:				Name and telephone number of person to be contacted on matters involving this application (give area code)					
Street:				Prefix:		First Name:			
City:				Middle Name					
County:				Last Name					
State:		Zip Code		Suffix:					
Country:				Email:					
6. EMPLOYER IDENTIFICATION NUMBER (EIN):				Phone Number (give area code)		Fax Number (give area code)			
<input type="text"/> - <input type="text"/>									
8. TYPE OF APPLICATION:				7. TYPE OF APPLICANT: (See back of form for Application Types)					
<input type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision If Revision, enter appropriate letter(s) in box(es) (See back of form for description of letters.)				Other (specify)					
<input type="checkbox"/> <input type="checkbox"/>									
Other (specify)								9. NAME OF FEDERAL AGENCY:	
10. CATALOG OF FEDERAL DOMESTIC ASSISTANCE NUMBER:				11. DESCRIPTIVE TITLE OF APPLICANT'S PROJECT:					
TITLE (Name of Program):				<input type="text"/> - <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>					
12. AREAS AFFECTED BY PROJECT (Cities, Counties, States, etc.):									
13. PROPOSED PROJECT				14. CONGRESSIONAL DISTRICTS OF:					
Start Date:		Ending Date:		a. Applicant		b. Project			
15. ESTIMATED FUNDING:				16. IS APPLICATION SUBJECT TO REVIEW BY STATE EXECUTIVE ORDER 12372 PROCESS?					
a. Federal		\$.00		a. Yes. <input type="checkbox"/> THIS PREAPPLICATION/APPLICATION WAS MADE AVAILABLE TO THE STATE EXECUTIVE ORDER 12372 PROCESS FOR REVIEW ON					
b. Applicant		\$.00		DATE:					
c. State		\$.00		b. No. <input type="checkbox"/> PROGRAM IS NOT COVERED BY E. O. 12372					
d. Local		\$.00		<input type="checkbox"/> OR PROGRAM HAS NOT BEEN SELECTED BY STATE FOR REVIEW					
e. Other		\$.00		17. IS THE APPLICANT DELINQUENT ON ANY FEDERAL DEBT?					
f. Program Income		\$.00		<input type="checkbox"/> Yes If "Yes" attach an explanation. <input type="checkbox"/> No					
g. TOTAL		\$.00							
18. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION/PREAPPLICATION ARE TRUE AND CORRECT. THE DOCUMENT HAS BEEN DULY AUTHORIZED BY THE GOVERNING BODY OF THE APPLICANT AND THE APPLICANT WILL COMPLY WITH THE ATTACHED ASSURANCES IF THE ASSISTANCE IS AWARDED.									
a. Authorized Representative									
Prefix		First Name			Middle Name				
Last Name					Suffix				
b. Title					c. Telephone Number (give area code)				
d. Signature of Authorized Representative					e. Date Signed				