



Shelter Partnership

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Regulations Division
Office of General Counsel
Department of Housing and Urban Development
451 7th Street SW, Room 10276
Washington, DC 20410-0500

Re: Docket No. FR-5474-I-01: Homeless Emergency Assistance and Rapid Transition to Housing: Emergency Solutions Grants Program and Consolidated Plan Conforming Amendments

Shelter Partnership, Inc. is grateful for the opportunity to submit the following comments regarding the Emergency Solutions Grant Program interim rule published by HUD on December 5th.

We commend HUD for aligning ESG program requirements with HUD's other formula programs and rental assistance programs, whenever it was possible or beneficial. We also commend HUD for moving towards a Consolidated Plan that is better aligned with Homeless Assistance programs and Continuum of Care outcomes.

Latest data show that in the City of Los Angeles, the Homelessness Prevention and Rapid Re-Housing Program (HPRP) provided security deposits and move-in assistance to 7,853 of the city's most economically disadvantaged homeless residents, including 354 veterans who have been stably housed in partnership with the U.S. Department of Veterans Affairs and the Housing Authority of the City of Los Angeles. We look forward to working with HUD as the City and County of LA look at lessons learned through HPRP and continuing specific HPRP-type activities (albeit at a much lower funding level) through ESG funds.

§576.2 Definitions

Private nonprofit organization; Unit of general purpose local government; Subrecipient

The interim ESG rule says that public housing agencies would not be eligible subrecipients for ESG funds. If the new ESG regulations intend to foster more collaboration with other targeted homeless programs, then HUD should allow jurisdictions to leverage ESG funds with public housing agency expertise and resources. The City of Los Angeles was able to leverage HPRP dollars to provide housing location, security deposits and move-in assistance to hundreds of VASH voucher holders and recipients of Section 8 Homeless Set-Aside vouchers. Since the local public housing agency was already inspecting these units, determining rent reasonableness and issuing checks to landlords, providing additional HPRP funds to the public housing agency for

security deposits helped streamline the administration of this successful program. Furthermore, coupling the public housing agency's activities with HPRP-funded housing locators and case managers helped rapidly re-house hundreds of homeless households. We urge HUD to allow jurisdictions that have similar collaborative relationships with their local public housing agencies to continue to collaborate when appropriate. If necessary, HUD could allow a waiver process as it did in the HPRP.

§576.400 (d) and §576.400 (e)

Centralized or coordinated assessment; Written standards for providing ESG assistance
We commend HUD for understanding that imposing a requirement for a centralized or coordinated system may have certain costs and risks. We also commend HUD for noting that such systems must be designed locally in response to local needs and conditions. While a coordinated system is a goal that Los Angeles is moving towards, we hope that HUD would take into consideration that it is no simple task to provide coordinated assessment in an area that spans over 4,000 square miles and encompasses 88 cities and four Continuums of Care. In Los Angeles, the Los Angeles Homeless Services Authority (LAHSA) has begun coordinating services for homeless families using 211 and seven regional hubs, but with a general population of 10 million people and an estimated 51,000 homeless people on any given night, it remains a challenge to provide coordinated services to all those who are in need throughout the County. It will take considerable time and money to create and implement coordinated assessment for all homeless populations in our region. HUD should ensure that planning, implementing and carrying out activities under coordinated assessment are eligible expenses under ESG.

The ESG interim regulations also say that ESG recipients must have written standards for providing ESG assistance and must consistently apply those standards for all program participants. Once again, HUD should take into consideration the difficulties in implementing uniform standards within such a vast region that is also underfunded in proportion to the number of homeless people. According to research done by the United Way, Los Angeles receives fewer dollars per homeless person than the average jurisdiction – in some cases, Los Angeles receives homeless funding per homeless person that is six times less than other jurisdictions. This continued underfunding coupled with our large homeless population has created a landscape of uneven capacity and high need. We ask that HUD provide very clear guidelines around what is expected and how much flexibility is allowed for a jurisdiction of our size and diversity.

Once again, we thank you for the opportunity to submit comments on the ESG interim rule. Please feel free to contact me at rschwartz@shelterpartnership.org or 213-943-4580.

Sincerely,

Ruth Schwartz
Executive Director