

Sacramento Housing and Redevelopment Agency Emergency Solutions Grant Program

ESG Desk Guide

SHRA

ESG Desk Guide

Version 1.7 – Revised: August/2017

Please note that all program information is subject to change as HUD provides additional guidance on the ESG program.

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1. INTRODUCTION

The Emergency Solutions Grant (ESG: 24 CFR Parts 91 and 576) program is authorized by the McKinney-Vento Homeless Assistance Act (McKinney-Vento) funded through the U.S. Department of Housing and Urban Development (HUD) as amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act: 42 USC 11371-11378). Among other changes, the HEARTH Act revised the Emergency Shelter Grants program and renamed the program the Emergency Solutions Grants Program. This federally funded program is administered through HUD by a formula allocation to ESG entitlement localities and states. ESG funds can be used for five program components:

- Street Outreach (24 CFR 576.101)
- Emergency Shelter (24 CFR 576.102)
- Homelessness Prevention (24 CFR 576.103)
- Rapid Re-Housing (24 CFR 576.104)
- HMIS (24 CFR 576.107)

The Sacramento Housing and Redevelopment Agency (SHRA), on behalf of the City and County of Sacramento (Sacramento Region), coordinated (24 CFR 576.400) with the Continuum of Care, the Housing Authority of the City of Sacramento, the Housing Authority of the County of Sacramento to ensure consistency of the information received from HUD for the ESG program. It is the responsibility of the ESG subrecipients to disseminate information pertinent to their respective initiatives and ensure that their staff and partner agencies are aware of, understand and comply with ESG federal regulations, policies, procedures and HUD-issued guidance. Recipients and subrecipients should always refer to the federal regulations to ensure that they are in compliance.

24 CFR Part 91, Consolidated Submissions for Community Planning and Development (CPD) Programs, as amended by ESG Interim Rule and the Final Rules for Homeless and Chronic Homeless, explains Consolidated Submissions for Community Planning and Development Programs.

Subrecipients are required to follow 2 CFR 200, Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards, as well as, 24 CFR Part 576 – Emergency Solutions Grant regulations, OMB Circulars and Guidance, as amended from time to time.

Changes In Laws And Regulations

In the event an applicable law or regulation is modified or eliminated, or a new law or regulation is adopted, the revised law or regulation shall, to the extent inconsistent with this contract's scope of work, automatically supersede this contract. Notification will be provided in a letter to place in this program's administrative file and to be retained for five-years from close-out.

2. PROGRAM DESCRIPTION

ESG Program (24 CFR Part 576)

ESG is a federal entitlement program which is allocated by HUD to a jurisdiction—the Grantee. The percentage allocated to States, metropolitan cities, and urban counties will be equal to the percentage of the total amount available under the Community Development Block Grant for the prior fiscal year.

SHRA, on behalf of the Grantees (City of Sacramento and the County of Sacramento) allocates ESG funding to program providers (i.e., the subrecipients) to operate eligible projects upon adoption of the One-Year Action Plan (24 CFR 576.400(e)), by the Sacramento City Council and the Sacramento County Board of Supervisors. SHRA may contract with more than one subrecipient to operate multiple projects (e.g., emergency shelter projects, prevention projects, rapid re-housing projects, etc.).

ESG was created to assist those families who are experiencing homelessness to be quickly re-housed and stabilized. ESG is focused on housing for homeless and at-risk households (ATTACHMENT A: HOMELESS AND AT-RISK OF HOMELESSNESS DEFINITIONS). The ESG Program will provide temporary eligible financial assistance and stabilization services to individuals and families **who are homeless or would be homeless *but for* this assistance.**

The funds under this program are intended to target individuals and families who are experiencing homelessness (i.e., residing in emergency or transitional shelters or on the street) or who are at imminent risk of homelessness (i.e., no subsequent residence has been identified; and the individual or family lacks the resources or support networks needed to obtain other permanent housing) need temporary assistance in order to obtain housing and retain it (rapid re-housing/prevention).

HUD expects that these resources will be targeted and prioritized to serve households that are most in need of this temporary assistance and are most likely to achieve stable housing, whether subsidized or unsubsidized, outside of ESG after the program concludes.

ESG assistance is not intended to provide long-term support for program participants, nor will it be able to address all of the financial and supportive services needs of households that affect housing stability. Rather, assistance should be focused on housing stabilization, linking program participants to community resources and mainstream benefits, and helping them develop a plan for future housing instability.

Consolidated Plan and One-Year Action Plan (24 CFR Part 91)

In addition to meeting the application submission requirements in 24 CFR Part 5, subpart K, each State, Urban County, or metropolitan city must submit and obtain HUD approval of a Consolidated Plan in accordance with 24 CFR Part 91. As provided under 24 CFR 85.12, HUD may impose special conditions or restrictions on a grant, if the recipient is determined to be high risk.

SHRA must amend its approved Consolidated Plan in order to make a change in its allocation priorities; make a change in its method of distributing funds; carry out an activity not previously described in the plan; or change the purpose, scope, location, or beneficiaries of an activity. The amendment must be completed and submitted to HUD in accordance with the requirements under 24 CFR 91.505.

During the development of One-Year Action Plans (updates the Consolidated Plan) SHRA consults with the City of Sacramento, the County of Sacramento, Sacramento Steps Forward (Lead of the Continuum of Care) and other targeted homeless service providers to coordinate and integrate to the maximum extent practicable performance standards for, and evaluating the outcomes of, projects and activities assisted by ESG funds (24 CFR 576.400). Consultation is to provide coordinated and strategic community-wide system to prevent and end homelessness in the Sacramento Region.

Following its Procurement Policy, a request for proposal may be issued by SHRA from time-to-time for the prevention/rapid re-housing component. In addition, SHRA will enter into emergency shelter (or other eligible ESG activities) subrecipient agreements upon approval of the One-Year Action Plans (24 CFR 576.400(e)).

Following the adoption of the One-Year Action Plans, SHRA may enter into a subrecipient agreement with the Housing Authority of the City of Sacramento and the Housing Authority of the County of Sacramento (collectively known as the Housing Authority) and may layer additional financial assistance with ESG funds, including but not limited to, tenant-based rental assistance from HOME Investment Partnership (HOME) program for Housing Authority VASH and Shelter Plus Care participants; and, Housing Opportunity for Persons with AIDS (HOPWA) and ESG funds for Volunteers of America's Open Arms clients.

3. ADMINISTRATIVE ACTIVITIES (24 CFR 576.108)

As program administrator, SHRA will utilize 7.5 percent of the annual grant for eligible administrative costs related to the planning and execution of ESG activities. This does not include HMIS, subrecipient staff and overhead costs directly related to carrying out activities eligible under 24 CFR 576.01 through 24 CFR 576.107, because those costs are eligible as part of those activities. Eligible administrative activities include:

- General Management/Oversight/Coordination – Costs of overall program management, coordination, monitoring and evaluation
 - Administrative services performed under third party contracts or agreements, including general legal services, accounting services, and audit services
 - Other costs for goods and services required for the administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space
 - Staff salaries, wages, and related costs of staff engaged in eligible program administration activities, including:

- Developing systems for assuring compliance with program requirements;
 - Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities;
 - Monitoring program activities for progress and compliance with program requirements;
 - Preparing reports and other documents directly related to the program for submission to HUD:
 - Coordinating the resolution of audit and monitoring findings;
 - Evaluating program results against stated objectives; and
 - Managing or supervising persons whose primary responsibilities with regard to this program include such assignments as those described in section 24 576.108.
- Travel costs incurred for monitoring subrecipients
- Training on ESG Requirements
 - Costs of providing trainings on ESG requirements and attending HUD-sponsored ESG trainings
- Consolidated Plan
 - Costs of preparing and amending the ESG and homelessness related sections of the consolidated plan in accordance with ESG requirements and 24 CFR pat 91
- Environmental Review
 - Costs of Carrying out the environmental review responsibilities under 24 CFR 576.407 of the HUD regulations

4. INDIRECT COSTS (24 CFR 576.109)

ESG grant funds may be used to pay indirect costs in accordance with 2 CFR Part 200, and OMB Circulars A-87 or A-122, as applicable.

5. MATCH (24 CFR 576.201)

SHRA requires that subrecipients keep record of the source and use of contributions made to satisfy the matching requirement for each ESG grant year, and upon request, provide match information for its inclusion in the One-Year Action Plan and end-of-year reporting. The records must indicate the particular fiscal year grant for which each matching contribution is counted. SHRA will supply subrecipients with a sample reporting mechanism (i.e. Excel spreadsheet) to report match. The subrecipient must keep records to show how the value placed on third-party, noncash contributions was derived. To the extent feasible, volunteer services must be supported by the same methods that the organization uses to support the allocation of regular personnel costs.

Matching contributions may be obtained from any source, including any Federal source other than the ESG program, as well as state, local and private sources. However, the following requirements apply to matching contributions from a Federal source of funds:

- SHRA requires subrecipients to ensure the laws governing any funds to be used as matching contributions do not prohibit those funds from being used to match ESG funds.
- If ESG funds are used to satisfy the matching requirements of another Federal program, then funding from that program may not be used to satisfy the matching requirements.
- In order to meet the matching requirement, the matching contribution must meet all requirements that apply to the ESG funds provided by HUD, except for the expenditure limits in 24 CFR 576.100.
- The matching contributions must be provided after the date that HUD signs the grant agreement.
- To count toward the required match for the grant year, subrecipient must ensure cash and non-cash contributions are expended within the expenditure deadline in 24 CFR 576.203.
- Contributions used to match a previous ESG grant year may not be used to match a subsequent grant.
- Contributions that have been or will be counted as satisfying a matching requirement of another Federal grant or award may not count as satisfying the matching requirement.

Eligible Types of Match

- *Cash contributions.* Cash expended for allowable costs, as defined in 2 CFR Part 200, and OMB Circulars A-87 and A-122, of the recipient or subrecipient.
- *Non-cash contributions.* The value of any real property, equipment, goods or services contributed to the recipient's or subrecipients' ESG program, provided that if the recipient or subrecipient had to pay for them with grant funds, the costs would have been allowable. Noncash contributions may also include the purchase value of any donated building.
 - To determine the value of any donated material or building, or of any lease, the recipient must use a method reasonably established to calculate fair market value.
 - Some noncash contributions are real property, equipment, goods or services that, if the recipient or subrecipient had to pay for them with grant funds, the payments would have been indirect costs. Matching credit for these contributions must be given only if the recipient or subrecipient has established, along with its regular indirect cost rate, a special rate for allocating to individual projects or programs the value of those contributions.
- *In-kind services.* Services provided by individuals must be valued at rates consistent with those ordinarily paid for similar work in the recipient's or subrecipients' organization. If the recipient's or subrecipients' does not have employees

performing similar work, the rates must be consistent with those ordinarily paid by other employers for similar work in the same labor market.

- *Costs paid by Program Income.* Costs paid by program income shall count toward meeting the matching requirement, provided the costs are eligible ESG costs that supplement the ESG program.

6. REALLOCATION AND RECAPTURE (24 CFR 576.501)

Each subrecipient agreement will contain progress benchmarks, including accurate and timely input of client demographic data into HMIS, which SHRA will review monthly. After the initial six month contract period, subrecipient agreements may be terminated and ESG funds may be reallocated by SHRA from agencies with poor performance to agencies that have performed well. The term of the subrecipient agreements will be executed upon approval of the One-Year Action Plan by the Sacramento City Council and Sacramento County Board of Supervisors. All subrecipient agreements shall be approved to form by SHRA Counsel.

7. EXPENDITURE REQUIREMENTS (24 CFR 576.203)

SHRA must draw down ESG funds not less than once per quarter. All ESG grant funds must be expended on eligible activities within 24-months after the grant agreement is signed by HUD. *Subrecipients are required to invoice SHRA not less than once per quarter* and SHRA shall pay subrecipient for allowable costs within 30 days after receiving the subrecipient's complete payment request.

Reconciliation

Reconciliation process: The ESG funds are drawn on a first-in/first-out basis. Thus the funds remaining in the FY 2010 grant in LOCCS (and on the PR01) are not actually tied to FY 2010 activities. In order to properly reconcile the disbursements, you need to reconcile the awards (as shown on the PR01) with the activities funded for each year (as shown on the PR02).

8. SEPARATION OF ACCOUNTS

All funds received by the Subrecipient from SHRA pursuant to this contract shall be maintained in an account in a federally insured banking or savings and loan institution with record keeping of such accounts maintained pursuant to applicable 2 CFR 200.302 requirements. The Subrecipient must be able to account for receipt, obligation and expenditure of ESG funds pursuant to applicable 2 CFR 200.302 requirements.

9. AUDIT REPORT REQUIREMENTS

The Subrecipient will follow 2 CFR Part 200 audit requirements. The Subrecipient agrees that if it expends seven hundred fifty thousand (\$750,000) or more in federal funds, the Subrecipient shall have an annual audit conducted by a certified public accountant in accordance with the standards set forth and published by the United States Office of Management and Budget.

The Subrecipient shall provide SHRA with a copy of most recent audit upon request.

10. COMPLIANCE WITH LAW/PROGRAM INCOME

The Subrecipient agrees to follow all program income requirements as stipulated in 2 CFR Part 200 and 24 CFR Part 576.

The Subrecipient acknowledges that the funds being provided by SHRA for said program are received by SHRA pursuant to the ESG regulations as amended and that expenditure of these funds shall be in accordance with all pertinent regulations issued by agencies of the federal government, including, but not limited to, all regulations found at Titles 2 and 24 of the Code of Federal Regulations. Program income received by the Subrecipient shall be returned to SHRA unless otherwise provided for in this contract. The Subrecipient agrees to comply fully with the federal, state and local laws and court orders applicable to its operation whether or not referred to in this contract.

11. DISBARMENT

To protect the public interest and ensure the integrity of Federal programs, SHRA may only conduct business with responsible persons and may not make any award or permit any award to any party which is debarred or suspended or is otherwise excluded from or ineligible for participation in Federal assistance programs under Executive Order 12549, "Disbarment and Suspension". The Subrecipient shall be in good standing without suspension by the California Secretary of State, Franchise Tax Board and Internal Revenue Service. Any change in the corporate status or suspension of the Subrecipient shall be reported immediately to SHRA.

12. RESEARCH AND DEVELOPMENT (R&D)

R& D is not an eligible activity for this contract (2 CFR Part 200.87). R&D means all research activities, both basic and applied, and all development activities that are performed by non-Federal entities. The term research also includes activities involving the training of individuals in

research techniques where such activities utilize the same facilities as other research and development activities and where such activities are not included in the instruction function. “Research” is defined as a systematic study directed toward fuller scientific knowledge or understanding of the subject studied. “Development” is the systematic use of knowledge and understanding gained from research directed toward the production of useful materials, devices, systems, or methods, including design and development of prototypes and processes.

13. INTERNAL CONTROLS AND PROTECTED PERSONALLY IDENTIFIABLE INFORMATION

2 CFR Part 200.303 sets forth requirements for internal controls and safeguards to protect personally identifiable/confidential/private information. Without prejudice to any other provisions of this contract, the Subrecipient shall, where applicable, maintain the confidential nature of information provided to it concerning participants in accordance with the requirements of federal and state law. However, the Subrecipient shall submit to SHRA, State or the U.S. Department of Housing and Urban Development (HUD) or its representatives, all records requested, including audit, examinations, assessments, monitoring and verifications of reports submitted by the Subrecipient, costs incurred and services rendered hereunder.

The Subrecipient will supply SHRA with a copy of its Accounting and Internal Control Policies and Procedures, and other administrative policies and procedures upon request.

14. COORDINATED ENTRY/ASSESSMENT

ESG providers must participate in Coordinate Entry/Assessment per 24 CFR Part 576.400(d)-Program Requirements: Centralized or Coordinated Assessment. SHRA and the Subrecipient(s) must coordinate with Sacramento Steps Forward to ensure the screening, assessment and referral of program participants are consistent with the written standards required by section 24 CFR Part 576.400(e). Victim service providers are follow policies established for individuals and families who are fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, or stalking.

15. INELIGIBLE COSTS

Emergency Shelter Renovation, Rehabilitation or Conversion

This category pertains to the renovation, major rehabilitation, or conversion of buildings to be used as emergency shelters.

1. Acquisition of real property
2. New construction
3. Property clearance or demolition
4. Rehabilitation administration

5. Staff training or fund raising activities associated with rehabilitation
6. Building maintenance and repairs (See Operations)

Essential Services

ESG essential services funding is not available for the following activities:

1. Existing services and staff (services must be new or provided to more persons)
2. Salary of case management supervisor when not working directly on participant issues
3. Advocacy, planning, and organizational capacity building
4. Staff recruitment/training
5. Transportation costs not directly associated with service delivery
6. Substance abuse treatment services for inpatient detoxification and other inpatient drug or alcohol treatment

Operations

ESG operations funding is not available for the following activities:

1. Recruitment or on-going training of staff
2. Depreciation
3. Costs associated with the organization rather than the supportive housing project (advertisements, pamphlets about organization, surveys, etc.)
4. Staff training, entertainment, conferences, or retreats
5. Public relations or fund raising
6. Bad debts/late fees
7. Mortgage payments

Homelessness Prevention

ESG Homeless prevention funding is not available for the following activities:

1. Housing/services to homeless persons
2. Direct payments to individuals
3. Long-term assistance beyond several months
4. Application for Federal Funds or Un-programmed Funds
5. Legal services for immigration and citizenship matters
6. Issues related to mortgages
7. Retainer fee and arrangements and contingency fee arrangements
8. Payment of temporary storage fees in arrears
9. Financial assistance to a household for a purpose and time period supported by another public source
10. Payment or modification of a debt
11. Late payment penalties

Rapid Re-Housing

1. Refer to the ESG RRH Desk Guide

Administration

1. Purchase of office space

16. ELIGIBLE ACTIVITIES AND COSTS (24 CFR 576.100-104)

ESG funds may be used for five program components: emergency shelter, street outreach, homelessness prevention, rapid re-housing assistance and HMIS; as well as administrative activities. The five program components and the eligible activities that may be funded under each are set forth in 576.101 through 576.107 and are generally described below. Eligible administrative activities are set forth in 576.108.

The total amount of SHRA's annual ESG grant that may be used for emergency shelter and street outreach activities cannot exceed the greater of:

1. 60 percent of the annual ESG grant; or
2. The amount of the 2010 ESG grant funds committed to homeless assistance activities.
3. The total amount of ESG funds that may be used for administrative activities cannot exceed 7.5 percent of SHRA's annual ESG grant.

ESG is subject to the cost principles in 2 CFR Part 200, OMB Circulars A-87 and A-122, as applicable, and other requirements in 24 CFR 576, employee compensation and other overhead costs directly related to carrying out emergency shelter, street outreach, homelessness prevention, rapid re-housing and HMIS and eligible costs of those program components. These costs are not subject to the expenditure limit described below.

Emergency Shelter Renovation, Rehabilitation or Conversion

This category pertains to the renovation, major rehabilitation, or conversion of buildings to be used as emergency shelters.

1. **Conversion:** a change in the use of building to an emergency shelter for the homeless under this part, where the cost of conversion and any rehabilitation costs exceed 75 percent of the value of the building after conversion.
2. **Major rehabilitation:** rehabilitation costs in excess of 75 percent of the value of the building before rehabilitation.
3. **Renovation:** rehabilitation that involves costs of 75 percent or less of the value of the building before renovation.
4. **Value of the building:** the monetary value assigned to a building by an independent real estate appraiser, or as otherwise reasonably established by SHRA.

Homelessness Prevention and Rapid Re-Housing Eligible Activities and Costs per 24 CFR 576.103 and 104

All clients must be determined to be eligible for assistance and must have the Homeless Certification filled out and signed (**Attachment H**). The executed certification must be kept in the client file.

Requirements of Homelessness Prevention

SHRA must approve in writing the use of Prevention with the exception of Bringing Families Home households referred by Sacramento County Child Protective Services.

ESG homelessness prevention assistance is intended to provide rental assistance and housing relocation and stabilization services necessary to prevent an individual or family from moving into an emergency shelter, the streets, or a place not meant for human habitation.

Individual or family who meets one of the following categories of HUD's Homeless Definition at 24 CFR 576.2 **AND** has an annual income below 30 percent of median family income for Sacramento County.

- Category 2 (imminent risk of homelessness)*
- Category 3 (homeless under other federal statutes)
- Category 4 (fleeing/attempting to flee violence, and not living in a place described in Category 1)*

*The definition includes the requirement that individuals and families have no other residence AND lack the resources and support networks to obtain other permanent housing.

OR

Individuals or families who meet one of the three categories of HUD's At Risk of Homelessness Definition at 24 CFR 576.2 **AND** has annual income below 30 percent of median family income for Sacramento County.

- Category 1**
- Category 2 (children/youth who do not qualify as homeless under the homeless definition in 576.2 but qualify as homeless under another Federal Statute)
- Category 3 (children/youth and their families who do not qualify as homeless under the homeless definition in 24 CFR 576.2, but who do qualify as homeless under Section 725(2) of the McKinney-Vento Homeless Assistance Act)

See 24 CFR 576.103.

** The definition includes the requirement that individuals and families lack the resources and support networks immediately available prevent them from moving to an emergency shelter or another place described in Category 1 of the homeless definition.

Requirements for Rapid Re-Housing

Individual or family who meets one of the following categories of HUD's definition at 24 CFR 576.2:

- Category 1 (literally homeless)
- Category 4 (fleeing/attempting to flee violence and living in a place described in Category 1)*

*The definition includes the requirement that individuals or families have no other residences AND lack the resources and support networks to obtain other permanent housing.

Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Eligible costs include:

- Rental Assistance: short – medium term not to exceed 24-months
- Financial Assistance: Rental arrears, rental application fees, security and utility deposits, utility payments, last month's rent, moving costs
- Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

See 24 CFR 576.104

17. HOUSING STATUS

ESG regulations require that in order to be eligible, a household must be in Category 1 of the HUD homeless definition or in Category 4 of the HUD homeless definition and living in an emergency shelter or other place defined in Category 1.¹ Households eligible under Category 1 are literally homeless, living on the streets or in an emergency shelter or transitional housing program or exiting an institution where they lived less than 90 days and were previously literally homeless. Households eligible under Category 4 are fleeing or attempting to flee domestic violence and have no other residence or resources and supports to obtain other permanent housing.

In developing client eligibility criteria for the RRH program, SHRA chose to be more restrictive, in order to target those people and households most in need of the assistance. Because people should not be exiting institutional settings directly into homelessness (e.g. the institutions should have adequate housing and discharge planning), this subset of Category 1 was excluded.

¹“Emergency Solutions Grant Program.” Federal Register 76:233 (December 5, 2011) p. 75975; Subpart A §576.2.

SHRA's Assistant Director of Development & Federal Programs can override this restriction. For authorization, ESG Provider staff is to contact SHRA in writing describing the situation and for SHRA's Assistant Director of Development & Federal Programs written approval.

In reviewing the response provided by OneCPD on July 22, 2015, regarding transitional housing (24 CFR 576.2), SHRA has revised its restriction on transitional housing. Persons staying in transitional housing may be eligible for ESG RRH assistance, regardless of the length of time they have been living in the transitional housing program though it is preferred that clients enter the ESG RRH program through the Coordinated Entry system. SHRA may approve a client for ESG rapid re-housing under special circumstances outside the Coordinated Entry system. Program participants who meet the criteria under Category 1 of the homeless definition in 24 CFR 576.2, which includes persons living in transitional housing and persons living in emergency shelter, move to and achieve stability in permanent housing (24 CFR 576.105(b)(1)).

While it is technically eligible, HUD cautions recipients against using ESG RRH funds as a way of regularly exiting a person from transitional housing to permanent housing. This is because rapid re-housing is a model for helping people move from the streets or shelter to permanent housing – it was not intended for people exiting transitional housing. Additionally, transitional housing providers are supposed to have program designs that successfully exit people and should not be using rapid re-housing – another form of temporary assistance – as a regular part of the program design. Therefore, SHRA will follow HUD's recommendation that this is to be done on a case-by-case basis, so that it is not a common practice but is provided only when necessary to prevent the program participant from going back to the streets or emergency shelter. For authorization, the Subrecipient's staff is to contact SHRA in writing describing the situation and for SHRA's Assistant Director of Development & Federal Programs written approval.

Program participants living in transitional housing would need to be assessed for and determined to be eligible for ESG assistance, in accordance with the ESG eligibility and documentation requirements. This includes a requirement that the assistance be necessary to help the program participant move as quickly as possible into permanent housing and achieve stability in that housing. Note that such a household would have to be exited from the transitional housing program in HMIS, and entered into the ESG program in HMIS. The assessment, HMIS Exit and Entry form and ESG RRH Program eligibility documentation, including the SHRA's Assistant Director of Development & Federal Programs written approval, must be kept in the client file. Please see below for additional information. Clients must be entered into HMIS as an ESG RRH participant for the Consolidated Annual Performance Report (CAPER). Per the terms of the contract between SHRA and the ESG Provider, program participants must be entered into HMIS per Sacramento Steps Forwards HMIS adopted policies.

OneCPD also provided the following clarification regarding: Is an individual or family that is receiving RRH assistance considered homeless for purposes of remaining eligible for other permanent housing placements? OneCPD answered, yes. Program participants that are receiving RRH assistance through programs such as the ESG program, the Continuum of Care (CoC) Program, the Supportive Services for Veterans Families (SSVF) Program, or the Veterans Homelessness Prevention Demonstration Program (VHPD) maintain their homeless status for

the purpose of eligibility for other permanent housing programs, such as HUD-VASH and CoC-funded permanent supportive housing (so long as they meet any other eligibility criteria for these programs). Program participants only maintain their homeless status during the time period that they are receiving RRH assistance. RRH is a model for helping homeless individuals and families obtain and maintain permanent housing, and it can be appropriate to use as a bridge to other permanent housing programs. SHRA also adds that when an ESG RRH Program participant enters into a lease, they do maintain their homeless status while a program participant. RRH Program Provider(s) are required to document the program participant continued program eligibility at entry and reassessment. Program eligibility must be maintained in the client file. Please see below for additional information.

It is important to note that although the program participants in RRH are considered homeless for purposes of eligibility for other programs, the housing itself is still considered permanent housing; therefore, these program participants are not considered homeless for counting purpose, and must not be included in the CoC's sheltered point-in-time count.

As with income eligibility, RRH program staff must determine and document the household's housing status in the participant file. Refer to the ESG RRH Desk Guide for a file checklist including acceptable and preferred documentation for verifying housing status that complies with HUD record keeping requirements.² Providers are to use the Homeless Certification (Attachment H).

The ESG RRH Desk Guide is to be utilized by the ESG RRH Provider to implement and administer the RRH program. This guide provides a summary of eligible and non-eligible activities.

18. HOUSING RELOCATION AND STABILIZATION SERVICES (24 CFR 576.105)

- 1) **Financial Assistance:** Funds which are paid to housing owners, utility companies, or other third parties. Funds are not paid to the participant. Funds are paid directly to the housing owner, utility company or other third-party. Financial Assistance *does not include rental assistance.*

Eligible costs include:

- **Moving Costs:** such as truck rental or hiring a moving company, including one-month storage fee.
- **Rent Application Fees:** application fee that is charged by the owner to all applicants.
- **Security Deposit:** equal to no more than two month's rent
- **Last Month's Rent:** paid to the owner of housing at the time security deposit and first month's rent are paid
- **Utility Deposit:** standard utility deposit required by the utility company for all customers (i.e., gas, electric, water/sewage)

²https://www.onecpd.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf

- Utility Payment: up to three months of utility payments per participant per service (i.e., gas, electric, water/sewage), including up to three months of arrearages, per service.

2) Services

Housing Search and Placement:

Eligible costs include:

- Assessment of housing barriers, needs and preferences
- Development of an action plan for locating housing
- Housing search and outreach to and negotiation with owner
- Assistance with submitting rental applications and understand leases
- Assessment of housing compliance with ESG requirements for habitability, lead-based paint, and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

Housing Stability Case Management: Eligible activities include, assessing, arrange, coordinating and monitoring the delivery of individualized services to facilitate housing stability.

Eligible costs include:

- Using the centralized or coordinated assessment system to conduct the initial evaluation and re-evaluation
- Counseling
- Developing, securing and coordinating services including federal, state and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing stability plan

Staff salaries related to carrying out Housing Relocation and Stabilization Services is an eligible cost.

19. SHORT-TERM RENTAL ASSISTANCE (UP TO THREE MONTHS), MEDIUM-TERM RENTAL ASSISTANCE (4-24 MONTHS) AND RENTAL ARREARS (ONE-TIME PAYMENT FOR UP TO 6 MONTHS OF RENT IN ARREARS) (24 CFR 576.106)

Any combination of the above types, so long as the total amount of assistance does not exceed 24 months during any three-year period.

Rental Assistance: Key Requirements

- Subject to HUD’s requirements, SHRA may establish caps and conditions on the amount of assistance program participants may receive.
- FMR limits, rent reasonableness standards, housing habitability standards, and lead-based paint regulations apply.
- Rental assistance agreement and written lease agreement required. When assistance is for arrears only, an oral lease may serve as documentation but this is not the preferred method.
- Rental assistance cannot be provided to a program participant this is receiving Tenant-Based Rental Assistance or living in an unit receiving (Project-Based Rental Assistance or operating assistance through other or public sources (exception applies to rental arrears on tenant’s portion of rental payment)).

20. EMERGENCY SHELTER ELIGIBLE ACTIVITIES AND COSTS PER 24 CFR 576.102

Essential Services:

- 1) **Case Management:** Assessing housing and service needs and arranging/coordinating/monitoring the delivery of individualized services.

Eligible costs include:

- Using centralized or coordinated assessment system
- Initial evaluation; verifying and documenting eligibility
- Counseling
- Developing/securing/coordinating services
- Helping to obtain federal, state and local benefits
- Monitoring/evaluating participants’ progress
- Providing information and referral to other providers
- Developing an individualized housing/service plan
- Staff salaries related to carrying out Emergency Shelter activities is an eligible cost.

- 2) **Child Care:** Licensed child care for program participants with children under the age of 13, or disabled children under the age of 18.

Eligible costs include:

- Meals and snacks
- Comprehensive and coordinated sets of appropriate developmental activity

- 3) **Education Services:** Instruction or training to enhance participants’ ability to obtain and maintain housing, including literacy, English as a second language, GED, consumer education, health education and substance abuse prevention.

Eligible costs include:

- Screening, assessment and testing
- Individual or group instruction
- Tutoring

- Provision of books, supplies and instructional material
 - Counseling
 - Referral to community resources
- 4) **Employment Assistance and Job Training:** Job training programs and services assisting participants to secure employment.

Eligible costs include:

- Classroom, online and/or computer instruction
 - On-the-job instruction
 - Job-finding, skill building
 - Reasonable stipends for participants in employment assistance and job training programs
 - Books and instructional materials
 - Employment screening, assessment or testing
 - Structured job seeking support
 - Special training and tutoring, including literacy training and pre-vocational training
 - Counseling or job coaching
 - Referral to community resources
- 5) **Outpatient Health Services:** Direct outpatient treatment of medical conditions provided by licensed medical professionals.

Eligible costs include:

- Assessing health problems and developing a treatment plan
 - Assisting program participants to understand their health needs
 - Providing or helping participants obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services
 - Providing medication and follow-up services
 - Providing preventive and non-cosmetic dental care
- 6) **Legal Services:** Necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing.

Eligible costs include:

- Hourly fees for legal advice and representation by licensed attorneys (or persons under the supervision of the licensed attorney) and fees-for-service if the cost would be less than the hourly fees
- Client intake, preparation of cases for trial, provision of legal advice, representation at hearings and counseling
- Representation and advice to resolve legal problems that prevent participants from obtaining or retaining permanent housing
 - Eligible subject matters include child support; guardianship; paternity; warrants; appeal of veterans and public benefit claim denials; and orders

of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault and stalking.

- 7) **Life Skills Training:** Critical life skills necessary to assist the program participant to function independently in the community.

Eligible costs include:

- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition
- Using public transportation
- Parenting

- 8) **Mental Health Services:** Direct outpatient treatment of mental health conditions by licensed professionals, provided that other appropriate mental health services are unavailable or inaccessible within the community.

Eligible costs include:

- Crisis intervention
- Individual, family or group therapy sessions
- Prescription of psychotropic medications or explanations about the use and management of medications
- Combinations of therapeutic approaches to address multiple problems

- 9) **Substance Abuse Treatment Services:** Treatment services provided by licensed or certified professionals that are designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors. Services are eligible only if other appropriate substance abuse treatment is unavailable or inaccessible within the community.

Eligible costs include:

- Client intake and assessment
- Outpatient treatment for up to 30 days
- Group and individual counseling
- Drug testing

- 10) **Transportation:** Costs for travel by program participants to and from medical care, employment, child care, or other facilities that provide eligible essential services, and the cost of staff travel to support provision of essential services.

Eligible costs include:

- Cost of a program participant's travel on public transportation
- Mileage allowance for service workers to visit participants

- Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes and maintenance for the vehicle

11) **Services for Special Populations:** Otherwise eligible essential services that have been tailored to address the special needs for *homeless youth; victims of domestic violence and related crimes/threats; and/or people living with HIV/AIDS* who are in emergency shelters.

Eligible costs include all ten categories of essential services described above.

Shelter Operations:

Costs to operate and maintain emergency shelters (or provide hotel/motel vouchers if no appropriate emergency shelter is available).

Eligible costs include:

- Maintenance (including minor or routine repairs)
- Rent
- Security
- Insurance
- Utilities
- Food (for participants only)
- Furnishings
- Equipment
- Supplies necessary for the operation of the emergency shelter
- Hotel/motel voucher for an homeless individual or family

All emergency shelters are responsible for developing their own policies/procedures regarding safety standards, admission, diversion, referral, discharge, and client assessment. This includes domestic violence service providers. SHRA will coordinate with the Continuum of Care and shelter providers to develop system-wide policies and procedures where appropriate.

21. STREET OUTREACH ELIGIBLE ACTIVITIES AND COSTS PER 24 CFR 576.101

1) **Engagement:** Activities to locate, identify, and build relationships with unsheltered homeless people for the purposes of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.

Eligible costs include:

- Initial assessment of needs and eligibility
- Crisis counseling
- Addressing urgent physical needs

- Actively connecting and providing information and referral to programs and services
 - Cell phone costs of outreach workers
- 2) **Case Management:** Assessing housing and service needs and arranging/coordinating/monitoring the delivery of individualized services.

Eligible costs include:

- Using centralized or coordinated assessment system
 - Initial evaluation; verifying and documenting eligibility
 - Counseling
 - Developing/securing/coordinating services
 - Helping to obtain federal, state and local benefits
 - Monitoring/evaluating participants' progress
 - Providing information and referral to other providers
 - Developing an individualized housing/service plan
 - Staff salaries related to carrying out street outreach and case management activities are eligible activities.
- 3) **Emergency Health Services:** Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (including streets, parks and campgrounds) to eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.

Eligible costs include:

- Assessing participants' health problems and developing treatment plans
 - Assessing participants to understand their health needs
 - Providing or helping participants obtain appropriate emergency medical treatment
 - Providing medication and follow-up services
- 4) **Emergency Mental Health Services:** Outpatient treatment of urgent mental health conditions by licensed professionals in a community-based setting (including streets, parks and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.

Eligible costs include:

- Crisis intervention
 - Prescription of psychotropic medications
 - Explanation of the use and management of medications
 - Combinations of therapeutic approaches to address multiple problems
- 5) **Transportation:** Travel by outreach workers, social workers, medical professionals, or other service providers during the provision of street outreach services.

Eligible costs include:

- Transporting unsheltered people to emergency shelters or other service facilities
- Cost of a participants' travel on public transportation
- Mileage allowance for outreach workers to visit participants
- Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes and maintenance of the vehicle.

6) **Services to Special Populations:** Otherwise eligible essential services that have been tailored to address the special needs of *homeless youth; victims of domestic violence and related crimes/threats; and/or people living with HIV/AIDS who are literally homeless.*

Eligible costs include:

- Engagement
- Case management
- Emergency health services
- Emergency mental health services
- Transportation

22. SHELTER AND HOUSING STANDARDS (24 CFR 576.403)

Refer to ATTACHMENT C for information on applicable requirements for Rental Assistance and Housing Relocation and Stabilization Services matrix. This matrix is designed to provide a quick reference for assessing which ESG standards apply when providing rental assistance or housing relocation and stabilization services under Rapid Re-Housing or Homelessness Prevention components of the ESG program. Recipients and subrecipients should always refer to federal regulations to ensure that they are in compliance with all regulations.

Below is the Habitability Checklist that must be utilized for ESG programs.

ESG Minimum Habitability Standards for Emergency Shelters and Permanent Housing: Checklists

About this Tool

The Emergency Solutions Grants (ESG) Program Interim Rule establishes different habitability standards for emergency shelters and for permanent housing (the Rapid Re-housing and Homelessness Prevention components).

- **Emergency Shelter Standards.**
 - Emergency shelters that receive ESG funds for renovation or shelter operations must meet the minimum standards for safety, sanitation, and privacy provided in §576.403(b).
 - In addition, emergency shelters that receive ESG funds for renovation (conversion, major rehabilitation, or other renovation) also must meet state or local government safety and sanitation standards, as applicable.
- **Permanent Housing Standards.** The recipient or subrecipient cannot use ESG funds to help a program participant remain in or move into housing that does not meet the minimum habitability standards under §576.403(c). This restriction applies to all activities under the Homelessness Prevention and Rapid Re-housing components.

Recipients and subrecipients must document compliance with the applicable standards.

Note that these checklists do not cover the requirements to comply with the Lead-Based Paint requirements at §576.403(a). For more discussion about how and when the standards apply, see *ESG Minimum Standards for Emergency Shelters and Permanent Housing*, located at <http://OneCPD.info/esg>.

The checklists below offer an optional format for documenting compliance with the appropriate standards. These are intended to:

1. Provide a clear summary of the requirements and an adaptable tool so recipients and subrecipients can formally assess their compliance with HUD requirements, identify and carry out corrective actions, and better prepare for monitoring visits by HUD staff.
2. Provide a tool for a recipient to monitor that its subrecipient is in compliance with HUD requirements. Where non-compliance is identified, the ESG recipient can use this information to require or assist the subrecipient to make necessary changes.

Prior to beginning the review, the subrecipient should organize relevant files and documents to help facilitate their review. For instance, this may include local or state inspection reports (fire-safety, food preparation, building/occupancy, etc.), or policy and procedure documents related to emergency shelter facility maintenance or renovations.

Carefully read each statement and indicate the shelter's or unit's status for each requirement (Approved or Deficient). Add any comments and corrective actions needed in the appropriate box. The reviewer should complete the information about the

project, and sign and date the form. This template includes space for an “approving official,” if the recipient or subrecipient has designated another authority to approve the review. When the assessment is complete, review it with program staff and develop an action plan for addressing any areas requiring corrective action.

Minimum Standards for Emergency Shelters

Instructions: Place a check mark in the correct column to indicate whether the property is approved or deficient with respect to each standard. A copy of this checklist should be placed in the shelter’s files.

Sample

Approved	Deficient	Standard (24 CFR part 576.403(b))
		1. <i>Structure and materials:</i> a. The shelter building is structurally sound to protect the residents from the elements and not pose any threat to the health and safety of the residents. b. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance uses Energy Star and Water Sense products and appliances.
		2. <i>Access.</i> Where applicable, the shelter is accessible in accordance with: a. Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; b. The Fair Housing Act (42 U.S.C. 3601 et seq.) and implementing regulations at 24 CFR part 100; and c. Title II of the Americans with Disabilities Act (42 U.S.C. 12131 et seq.) and 28 CFR part 35.
		3. <i>Space and security:</i> Except where the shelter is intended for day use only, the shelter provides each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
		4. <i>Interior air quality:</i> Each room or space within the shelter has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents.
		5. <i>Water Supply:</i> The shelter’s water supply is free of contamination.
		6. <i>Sanitary Facilities:</i> Each program participant in the shelter has access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
		7. <i>Thermal environment:</i> The shelter has any necessary heating/cooling facilities in proper operating condition.
		8. <i>Illumination and electricity:</i> a. The shelter has adequate natural or artificial illumination to permit normal indoor activities and support health and safety. b. There are sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
		9. <i>Food preparation:</i> Food preparation areas, if any, contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
		10. <i>Sanitary conditions:</i> The shelter is maintained in a sanitary condition.
		11. <i>Fire safety:</i> a. There is at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors are located near sleeping areas. b. All public areas of the shelter have at least one working smoke detector. c. The fire alarm system is designed for hearing-impaired residents. d. There is a second means of exiting the building in the event of fire or other emergency.
		12. If ESG funds were used for renovation or conversion, the shelter meets state or local government safety and sanitation standards, as applicable.
		13. Meets additional recipient/subrecipient standards (if any).

CERTIFICATION STATEMENT

I certify that I have evaluated the property located at the address below to the best of my ability and find the following:

- Property meets all of the above standards.
- Property does not meet all of the above standards.

COMMENTS:

ESG Recipient Name: _____

ESG Subrecipient Name (if applicable): _____

Emergency Shelter Name: _____

Street Address: _____

City: _____ State: _____ Zip: _____

Evaluator Signature: _____ Date of review: _____

Evaluator Name: _____

Approving Official Signature (if applicable): _____ Date: _____

Approving Official Name (if applicable): _____

Minimum Standards for Permanent Housing

Instructions: Place a check mark in the correct column to indicate whether the property is approved or deficient with respect to each standard. The property must meet all standards in order to be approved. A copy of this checklist should be placed in the client file.

Sample

Approved	Disapproved	Standard <i>(24 CFR part 576.403(c))</i>
		1. <i>Structure and materials:</i> The structure is structurally sound to protect the residents from the elements and not pose any threat to the health and safety of the residents.
		2. <i>Space and security:</i> Each resident is provided adequate space and security for themselves and their belongings. Each resident is provided an acceptable place to sleep.
		3. <i>Interior air quality:</i> Each room or space has a natural or mechanical means of ventilation. The interior air is free of pollutants at a level that might threaten or harm the health of residents.
		4. <i>Water Supply:</i> The water supply is free from contamination.
		5. <i>Sanitary Facilities:</i> Residents have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
		6. <i>Thermal environment:</i> The housing has any necessary heating/cooling facilities in proper operating condition.
		7. <i>Illumination and electricity:</i> The structure has adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There are sufficient electrical sources to permit the safe use of electrical appliances in the structure.
		8. <i>Food preparation:</i> All food preparation areas contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.

		9. <i>Sanitary condition:</i> The housing is maintained in sanitary condition.
		10. <i>Fire safety:</i> <ul style="list-style-type: none"> a. There is a second means of exiting the building in the event of fire or other emergency. b. The unit includes at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors are located, to the extent practicable, in a hallway adjacent to a bedroom. c. If the unit is occupied by hearing-impaired persons, smoke detectors have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. d. The public areas are equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, day care centers, hallways, stairwells, and other common areas.
		11. Meets additional recipient/subrecipient standards (if any).

CERTIFICATION STATEMENT

I certify that I have evaluated the property located at the address below to the best of my ability and find the following:

- Property meets all of the above standards.
- Property does not meet all of the above standards.

COMMENTS:

ESG Recipient Name: _____

ESG Subrecipient Name: _____

Program Participant Name: _____

Street Address: _____

Apartment: _____

City: _____ State: _____ Zip: _____

Evaluator Signature: _____ Date of review: _____

Evaluator Name: _____

Approving Official Signature (if applicable): _____ Date: _____

Approving Official Name (if applicable): _____

23. PARTICIPANT ELIGIBILITY (24 CFR 576.2, 576 Subpart B and 24 CFR 576.500)

The intent of ESG is to provide funding for housing expenses to individuals and families who are homeless or are at-risk of becoming homeless and program operation/delivery expenses. This program targets persons who meet the HUD definition of homeless. For complete information on eligibility and documentation requirements, please review the homeless and at-risk of homelessness definitions at 24 CFR 576.2, the eligibility criteria at 24 CFR 576 Subpart B and ESG recordkeeping and reporting requirements at 24 CFR 576.500, and ATTACHMENTS A: HOMELESS AND AT-RISK OF HOMELESSNESS DEFINITIONS AND F: 24 CFR PART 576-EMERGENCY SOLUTIONS GRANT PROGRAM.

Subrecipient agencies are required to verify and document a participant's actual homelessness. Income eligibility and need for assistance must be evaluated and certified at least once every three months for participants or at time of entry into the program if assistance is one-time or only lasts three months.

Please refer to ATTACHMENT B: SNAPS-Shots dated March 25, 2013 for caps on types of services. For example, security deposits cannot be for more than two months.

24. TERMINATING ASSISTANCE (24 CFR 576.402)

The ESG Provider may terminate assistance to a household who violates program requirements. In terminating assistance to a household, the ESG provider must provide a formal process that recognizes the rights of the individuals receiving assistance to due process of law. This process must be in writing and available for review in the program file and, at a minimum, consist of:

1. Written notice to the household containing a clear statement of the reason(s) for termination;
2. A review of the decision, in which the household is given the opportunity to present written or oral objections before a person other than the person (or a subordinate of that person) who made or approved the termination decision; and
3. Prompt written notice of the final decision to the household.

Appeals and Grievances

The program participant has the right to register formal complaints regarding ESG funded services and will not be denied these services based upon such complaints. The ESG Provider must have a written grievance and appeals procedure that is presented to the Participant during the initial assessment, whether they are provided assistance or not. The Participant is to print their name and sign in blue ink that they have had the grievance procedure explained to them, the document is to be placed in the Participant file.

The ESG Provider's grievance procedure is intended to address only issues specific to the ESG program. The program is not expected to address complaints lodged by one Participant in reference to another Participant's issues; neither is it expected to address complaints regarding other agencies or external programs.

25. ABSENCE DUE TO MEDICAL REASONS

If any family member leaves the household to enter a facility such as hospital, nursing home, or rehabilitation center, the ESG Provider will seek advice from a reliable qualified source as to the likelihood and timing of their return. If the verification indicates that the family member will be permanently confined to a nursing home the family member will be considered permanently absent. If the verification indicates that the family member will return in less than thirty (30) consecutive days the family member will not be considered permanently absent as long as rent and other charges remain current. The ESG Provider will conduct a re-assessment once it is confirmed that the family member is considered to be permanently absent.

If the person who is determined to be permanently absent or deceased and is the sole member of the household, assistance will be terminated in accordance with the ESG "Absence of Entire Family" policy.

26. REMAINING MEMBER OF RESIDENT FAMILY – RETENTION OF UNIT

To be considered the remaining member of the resident family, the person must have been previously approved by the ESG RRH Provider to be living in the unit. The family member must be on the lease. The ESG RRH Provider will conduct a re-assessment once it is confirmed that the household composition has changed.

A live-in aide, by definition, is not a member of the family and will not be considered a remaining member of the family. A live-in-aide is not considered a roommate and will not be considered a remaining member of the family. A roommate must be qualified separately to receive ESG RRH assistance and have s(he) own lease for the unit.

27. ABSENCE OF ENTIRE FAMILY/HOUSEHOLD

These policy guidelines address situations when the family is absent from the unit, but has not moved out of the unit. In cases where the family has moved out of the unit the ESG Provider will terminate the household from the program. The household is required to notify the ESG Provider and their landlord/property manager before they move out of a unit in accordance with the lease and to give the ESG RRH Provider information about any family absence from the unit. During the period of absence the rent and other charges must remain current.

"Absence" means that no authorized family member is residing in the unit. The authorized household may not sublease the unit nor have unauthorized guests live in the unit while the family is absent.

In order to determine if the family is absent from the unit, the ESG Provider may:

- Conduct home visit
- Write letters to the family at the unit
- Post letters on exterior door
- Telephone the family at the unit
- Interview neighbors, landlord and/or property manager
- Verify if utilities are in service
- Check with Post Office for forwarding address
- Contact emergency contact

If the entire family is absent from the unit, without the ESG RRH Provider's permission, for more than thirty (30) consecutive days, the unit will be considered to be vacant and the ESG RRH Provider will terminate rental assistance.

28. ABSENCE DUE TO INCARCERATION

Any member of the household will be considered permanently absent if s/he is incarcerated for thirty (30) or more consecutive days. The ESG Provider will determine if the reason for incarceration is for drug-related or criminal activity, which would threaten the health, safety and right to peaceful enjoyment of the dwelling unit by other residents. The ESG Provider will conduct a re-assessment once it is confirmed that the family member is considered to be permanently absent.

The rent and other charges must remain current during this period and may result in the termination of rental assistance.

29. RECORD KEEPING (2 CFR Part 200 and 24 CFR 576.500)

On December 5, 2011, HUD published its final rule on the definition of homelessness in the Federal Register. The new rule went into effect on January 4, 2012 and altered the regulations found in 24 CFR Parts 91, 582 and 583. All programs funded under ESG must use the definition of homelessness and at-risk of homelessness found in HUD's recently updated regulations. See ATTACHMENT A: HOMELESS AND AT-RISK OF HOMELESSNESS DEFINITIONS and ATTACHMENT B for SNAPS-Shot for additional information. Refer to 24 CFR 576.500 for detailed record keeping requirements. Following is a summation.

Record Keeping and Retention

All accounting records, reports, and evidence pertaining to all costs, expenses and the ESG funds of the Subrecipient and all documents related to the contract shall be maintained and kept available at the Subrecipient's office or place of business for the duration of the contract and thereafter for five (5) years (§Parts 91, 200 and 576) from the date of final payment under this contract. Additionally, the reporting requirements under the Federal Funding Accountability and Transparency Act of 2006, (31 U.S.C. 6101 note), which are set forth in 2 CFR part 170, as applicable must also be followed. Records which relate to (a) complaints, claims, administrative proceedings or litigation arising out of the performance of this contract, or (b) costs and expenses of this contract to which SHRA or any other governmental agency or law enforcement take exception, shall be retained beyond the five (5) years until complete resolution or disposition of such appeals, litigation claims, or exceptions. In the event the Subrecipient does not make above-referenced documents available to SHRA, the Subrecipient agrees to pay all necessary and reasonable expenses incurred by SHRA in conducting any audit at the location where said records and books of account are maintained.

30. ACCESS TO RECORDS

Law enforcement, SHRA, State, and the United States Federal Government and their representatives or auditors shall have access for purposes of monitoring, auditing, and examining the Subrecipient activities and performance, to books, documents and papers, and the right to examine records of the Subrecipient subcontractors, bookkeepers and accountants, employees and participants in regard to said program. SHRA, State and United States Federal Government and their representatives or auditors shall also schedule on-site monitoring at their discretion. Monitoring activities may also include, but are not limited to, questioning employees and participants in said program and entering any premises or any site in which any of the services or activities funded hereunder is conducted or in which any of the records of the

Subrecipient are kept. Nothing herein shall be construed to require access to any privileged or confidential information as set forth in federal or state law.

31. HUD'S PREFERRED ORDER FOR DOCUMENTATION

Under HUD's new regulations, there are three categories of at-risk homelessness and for program eligibility at least one of the three categories must be met and documented.

When documenting homelessness, program staff should use the following methods, listed in HUD's preferred order:

- 1) Third-party Verification
 - a. Source: Documents that exist for the purpose other than determination of eligibility (such as bank statements, pay stubs, benefit letters, termination notices, etc.)
 - b. Written: Documents (such as letters or written referrals) that are prepared for the purpose of determining eligibility for program services
 - c. Oral: Verbal confirmation of status by a third-party (i.e., verification by phone)
- 2) Intake Staff Observation
- 3) Self-Certification

Standards for Documentation (by at-risk categories):

Category 1 – Individuals and Families (must meet all three conditions)

Condition 1: Income below 30 percent of Area Median Income, as determined by HUD

Condition 2: Lack of resources and support networks to prevent homelessness

- Documentation: termination notice, unemployment compensation statement, bank statement, health care or utility bill showing arrears.
- Self-certification is sufficient, supported by other documentation when practical

Condition 3: Meets one of seven risks specified in ESG regulations

- Documentation should follow HUD's preferred order, as appropriate
- Intake observation is only appropriate for Risks 2, 4 and 5 below
- Due diligence must be documented if third-party verification is unavailable

Risk 1: Persistent housing instability (two or more moves within 60 days) due to economic reasons

- Intake observation is not acceptable
- Economic reasons may include termination from employment, unexpected medical costs, inability to maintain housing (including utilities), etc.
- Examples of acceptable documentation include HMIS records, referral form housing or service provider, letter from owner, notice of job termination, health care bills indicating arrears and utility bills indicating arrears

Risk 2: Living in the home of another because of economic hardship

- Intake observation is acceptable
- Housing must be in the home of another
- Example of appropriate documentation is a letter from tenant/owner
- Economic reasons may include termination from employment, unexpected medical costs, inability to maintain housing (including utilities), etc.

Risk 3: Housing loss within 21 calendar days

- Intake observation is not acceptable
- Only third-party documentation (source or written) is appropriate
- Examples of appropriate documentation includes an eviction notice or court order to leave within 21 days

Risk 4: Living in a rental hotel or motel (costs not covered by charitable organization or government program)

- Intake observation is acceptable
- Preferred documentation is a letter from hotel/motel confirming that the household is living there and covering the costs themselves
- Verification that costs are covered by the household can include cancelled checks, receipts and credit card statements

Risk 5: Living in a severely over-crowded unit as defined by the US Census Bureau

- Intake observation is acceptable
- Census Bureau definition of an over-crowded unit is more than two people in a SRO or efficiency apartment OR more than 1.5 persons per room in larger housing units (i.e. two or more people in a one bedroom unit)
- Documentation must include the number of rooms in the unit and the number of individuals in the unit
- Examples of documentation include a copy of the lease, unit details from Tax Assessor's office

Risk 6: Exiting a publicly funded institution or system of care

- Intake observation is not acceptable
- Documentation must verify discharge from a health care facility, foster care or other youth facility or correction program
- Verification can be oral (i.e. verbal confirmation by phone) which is recorded and certified by intake worker
- Examples of written documentation include discharge paperwork, referral letter from facility

Risk 7: Living in housing associated with instability and increased risk of homelessness as described in approved Consolidated Plan

- The approved Consolidated Plan includes the risks 1-6 which makes Risk 7 not applicable as eligibility would fall under one of the previous six risks.

Category 2 – Unaccompanied Children and Youth Who Qualify Under Another Federal Statute

- Verification of homeless status must be proved by the agency administering the applicable federal program
- Third-party written verification is the only acceptable form of documentation
- Acceptable documentation includes a letter or standardized form from the agency administering the program which confirms the client’s homeless status

Category 3-Families with Children and Youth Who Qualify Under McKenny-Vento

- Verification of homeless status must be proved by the agency administering the applicable federal program
- Third-party written verification is the only acceptable form of documentation
- Acceptable documentation includes a letter or standardized form from the agency administering the program which confirms the client’s homeless status
- Documentation must confirm that family/guardian is residing with children/youth

33. INCOME DOCUMENTATION STANDARDS (24 CFR 576.500)

Refer to Sections 8 through 12 for additional information regarding participant eligibility.

Income documentation is required for homelessness prevention services and rapid re-housing clients at intake and client file must be retained for five (5) years from program exit.

Types of Acceptable Documentation

- 1) Third-party Verification
 - a. Source: Documents that exist for the purpose other than determination of eligibility (such as bank statements, pay stubs, benefit letters, termination notices, etc.)
 - b. Written: Documents (such as letters or written referrals) that are prepared for the purpose of determining eligibility for program services
 - c. Oral: Verbal confirmation of status by a third-party (i.e., verification by phone)
- 2) Self-Certification (not preferred and to be utilized in rare circumstances)

Income Inclusions and Examples of Acceptable Documentation

- Earned Income: payment statement (pay stub), statement of income from employer
- Self-Employment/Business Income: most recent financial statement
- Interest/Dividend Income: most recent interest or dividend income statement
- Pension/Retirement Income: most recent benefit notice, pension statement or other payment statement from pension provider
- Armed Forces Income: payment statement (pay advice/pay stub), statement of income from a government official or agency

- Unemployment and Disability Income: most recent benefit or disability income notice from SSI or statement from SSI
- Public Assistance, including TANF: most recent benefit or income notice from public assistance administrator, statement from public assistance administrator
- Alimony and Child Support: court order, cancelled checks
- No Income Reported: self-certification

34. DATA COLLECTION AND EVALUATION (24 CFR 576.107)

ESG data collection and client demographic reporting is conducted through the HMIS (ATTACHMENT D – HMIS DATA STANDARDS and ATTACHMENT E: ESG DATA STANDARDS). Each participating agency is responsible for collecting and entering client data accurately and in a timely manner into HMIS per the terms of the subrecipient agreement. Agencies must comply if asked to participate in HUD-sponsored research and evaluation of ESG. ESG funds are eligible administration for costs to the agency of participating in HUD research and evaluation of the program.

All programs receiving ESG funding, with the exception of programs serving domestic violence victims, are required to report client demographics in HMIS. Subrecipients are required to comply with current HUD-standards on HMIS participation, data collection and reporting. Failure to comply with the federal requirements will be grounds to terminate the subrecipient from the ESG program. SHRA will work with the subrecipient on compliance issues. The subrecipient must communicate in writing to SHRA why client demographic data is not being entered into HMIS, what steps they are taking to rectify the situation including completion deadline. SHRA reserves the right to terminate the subrecipient from the program if the subrecipient fails to enter data correctly into HMIS. Please also refer to Section 6. REALLOCATION AND RECAPTURE (24 CFR 576.501) for additional information.

Reasonable and appropriate costs associated with operating HMIS, or a comparable database, are allowable expenses.

Eligible Costs:

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, fax machines and furniture
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute to the HMIS
- Paying salaries for operating HMIS, including:
 - Completing data entry
 - Monitoring and reviewing data quality

- Completing data analysis
- Reporting to the HMIS Lead
- Training staff on using the HMIS or comparable database
- Implementing and complying with HMIS requirements
- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of McKinney-Vento Act
- Paying staff travel costs to conduct intake
- Paying participation fees charged by HMIS Lead, if SHRA or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the Continuum of Care to operate the area's HMIS.
- If the subrecipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) and generates unduplicated aggregate reports based on the data. Information entered into a comparable database must not be entered directly into or provided to an HMIS.

35. REPORTING (24 CFR 576.500)

Reporting ESG activities to HUD is done by SHRA in an annual reporting vehicle called the Consolidated Annual Performance and Evaluation Report (CAPER). SHRA must collect and report data on its use of ESG funds in the Integrated Disbursement and Information System (IDIS) and other reporting systems, as specified by HUD. Annual performance reports are due 90 days after the close of the recipient's consolidated program year which for SHRA is March 31st. SHRA must also comply with the reporting requirements in §Parts 200, 91 and 576, as well as, the reporting requirements under the Federal Funding Accountability and Transparency Act of 2006, (31 U.S.C. 6101 note), which are set forth in ATTACHMENT A to 2 CFR part 170.

The ESG Provider(s) are to enter all client demographics into HMIS per Sacramento Steps Forward's Data Quality Plan and work with Sacramento Steps Forward and SHRA on producing the data for the HUD mandated eCart to report ESG accomplishments. SHRA will provide financial aggregate data into IDIS to complete the CAPER. Please refer to ATTACHMENT E: ESG DATA STANDARDS AND REPORTING for additional information.

36. IDIS

The ESG program uses IDIS to manage program funds. Refer to ATTACHMENT G – USING IDIS ONLINE FOR THE ESG PROGRAM (note that the reader should always check online for the most current IDIS Version. These instructions explain how to use IDIS for ESG and assume that readers have basic knowledge of how to navigate IDIS.

37. ONECPD RESOURCE EXCHANGE

The OneCPD Resource Exchange website (<https://www.onecpd.info/>) provides a one-stop shop for resources, updates, and information related to all CPD programs.

The reader should also sign up for the OneCPD Mailing List to ensure that they are made aware of any updates to the IDIS requirements. Refer to ATTACHMENT G – USING IDIS ONLINE FOR THE ESG PROGRAM’S APPENDIX B: IDIS RESOURCES for information on signing up for the OneCPD Mailing List.

38. ENVIRONMENTAL CLEARANCE

SHRA shall conduct *environmental review* in accordance with 24 CFR 58 – Protection and Enhancement of Environmental Quality. Contracts will not be executed until SHRA has completed the environmental review.

39. FAITH-BASED ORGANIZATIONS

Organizations that are religious or faith-based are eligible, on the same basis as any other organization, to receive ESG funds. Neither the Federal Government nor a State or local government receiving funds under ESG shall discriminate against an organization on the basis of the organization’s religious character or affiliation. Organizations that are directly funded under the ESG program may not engage in inherently religious activities, such as worship, religious instruction, or proselytization as part of the programs or services funded under ESG. If an organization conducts these activities, the activities must be offered separately, in time or location, from the programs or services funded under ESG, and participation must be voluntary for program participants. Any religious organization that receives ESG funds retains its independence from Federal, State, or local governments, and may continue to carry out its mission, including the definition, practice, and expression of its religious beliefs, provided that the religious organization does not use direct ESG funds to support any inherently religious activities, such as worship, religious instructions or proselytization. Among other things, faith-based organizations may use space in their facilities to provide ESG funded services, without removing religious art, icons, scriptures, or other religious symbols. In addition, an ESG funded religious organization retains its authority over its internal governance, and the organization may retain religious terms in its organization’s name, select its board members on a religious basis, and include religious references in its organization’s mission statement and other governing documents. An organization that receives ESG funds shall not, in providing ESG

assistance, discriminate against a program participant or prospective program participant on the basis of religion or religious belief.

40. OTHER FEDERAL REQUIREMENTS

Added February 3, 2017, SHRA, subrecipients and participants shall abide by CPD- Notice 17-01: Notice Establishing Additional Requirements for a Continuum of Care Centralized or Coordinated Entry System which is cross-referenced in 24 CFR Part 578, 42 U.S.C 11381, *et seq.*, 24 Part 576, and 42 U.S.C. 11371, *et seq.*, Notice CPD-014-12, 42 U.S.C. 13925, *et seq.*

SHRA, subrecipients and participants shall abide by, and document its compliance, all sections contained within the 2 CFR Part 200 and 24 CFR 576, including but not limited to Conflicts of Interest (24 CFR 576.404), Homeless Participation (24 CFR 576.405, Faith-Based Activities (24 CFR 576.406), Other Federal Requirements (24 CFR 576.407), and Displacement, Relocation and Acquisition (24 CFR 576.408).

- SHRA and ESG Providers, and subrecipients, shall abide by, and document its compliance, all sections contained within the 24 CFR 576, including but not limited to Conflicts of Interest (24 CFR 576.404), Homeless Participation (24 CFR 576.405, Faith-Based Activities (24 CFR 576.406), Other Federal Requirements (24 CFR 576.407), and Displacement, Relocation and Acquisition (24 CFR 576.408).
- SHRA shall conduct *environmental review* in accordance with 24 CFR 50 – Protection and Enhancement of Environmental Quality. Contracts will not be executed until SHRA has completed the environmental review.
- SHRA and the ESG Providers must keep *documentation showing that ESG grant funds were spent on allowable costs* in accordance with the requirements for eligible activities under 576.101 – 576.109 and the cost principles 2 CFR Part 200 and in OMB Circulars A-87 and A-122, as applicable and amended from time to time.
- SHRA and the ESG Providers must retain records of the receipt and use of *program income*.
- SHRA and the ESG Providers *must retain copies of all solicitations of and agreements* with subrecipients, contractors, records of all payment requests by and dates of payment made to subrecipients, and documentation of all monitoring and sanctions of subrecipients, as applicable for five-years from contract completion date per §Parts 200 and 576.
- SHRA and the ESG Providers must *retain copies of all procurement contracts and documentation of compliance with the procurement requirements* in 2 CFR Part 200.

- SHRA and the ESG Providers *must comply with recordkeeping requirements specified by HUD notice or regulations.*
- SHRA and the ESG Providers *must keep other records as specified by HUD.*
- SHRA and the ESG Providers *must develop and implement written confidentiality procedures.*
- *All records pertaining to each Grant Award year of ESG funds must be retained for a period of five-years from Grant Award execution.* Copies made by microfilming, photocopying, or similar method may be substituted for original records. SHRA and ESG RRH Provider must make available said documents upon request of SHRA or other federal official.
- *Documentation of each program participant's qualification* as a family or individual at risk of homelessness or as a homeless family or individual and other program participant records must be *retained for five years* after the expenditure of all funds from the grant under which the program participant was served.
- *Access to records. Federal government rights.* Notwithstanding confidentiality procedures, HUD, the HUD Office of the Inspector General, and the Comptroller General of the United States, or any of their authorized representatives, must have the right of access to all books, documents, papers, or other records of SHRA and ESG Providers that are pertinent to the ESG program grant, in order to make audits, examinations, excerpts and transcripts. These rights of access are not limited to the required retention period but last as long as the records are retained.
- *Public Rights.* SHRA must provide citizens, public agencies, and other interested parties with reasonable access (consistent with state and local laws regarding privacy and obligations of confidentiality and the confidentiality requirements in this part) to records regarding any uses of ESG funds the recipient received during the preceding five years.
- *Drug-Free Workplace Requirements.* The Drug-Free Workplace Act of 1988 (41 U.S.C. 701, et seq.) and HUD's implementing regulations at 24 CFR part 21 apply to ESG. The use of illegal drugs is cause for termination from employment.

SHRA strongly encourages the ESG RRH Provider to implement a Drug-Free Workplace Policy to provide a workplace that is drug and alcohol free. This Policy should state,

- A. The unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance or alcohol in the workplace is prohibited.
- B. The requirements of paragraph A of this section are a condition of employment of all employees.

- C. The Employer retains the right, with reasonable suspicion, to test employees for drug or alcohol influence while at work. Refusal to submit to a test will be considered a positive test and will result in disciplinary action up to and including termination.

41. NONDISCRIMINATION AND EQUAL OPPORTUNITY REQUIREMENTS

EQUAL ACCESS TO HOUSING IN HUD PROGRAMS REGARDLESS OF SEXUAL ORIENTATION OR GENDER IDENTITY. “Equal Access Rule of 2012” (24 CFR Parts 5, 200, 203, 236, 400, 570, 574, 576, 882, 891, and 982). HUD has implemented a policy to ensure that its core programs are open to all eligible individuals and families regardless of sexual orientation, gender identity, or marital status. The ESG RRH Provider shall follow all HUD policies and guidance. For additional information, refer to Final Rule published February 3, 2012 and HUD Docket No. FR 5863-F-02 - *Equal Access in Accordance with an Individual’s Gender Identity in Community Planning and Development Programs*.

VIOLENCE AGAINST WOMEN REAUTHORIZATION ACT OF 2013 (“VAWA 2013”)

Final Rule is effective December 16, 2016. See **Appendix I** for VAWA forms. VAWA 2013 continues to bar eviction and termination due to a tenant’s status as a survivor, and requires landlords to maintain survivor-tenant confidentiality. It also continues to prohibit a tenant who is a survivor of domestic violence from being denied assistance, tenancy, or occupancy rights based solely on criminal activity related to an act of domestic violence committed against them.

VAWA 2013 now expressly extends housing protections to survivors of sexual assault, and adds “intimate partner” to the list of eligible relationships in the domestic violence definition. Protections also now cover an “affiliated individual,” which includes any person living with the survivor and related to him or her by blood or marriage including the survivor’s spouse, parent, brother, sister, child, or any person to whom the survivor stands in loco parentis.

It continues to allow a lease bifurcation so a tenant or lawful occupant who engages in criminal acts of physical violence against affiliated individuals or others may be evicted or removed without evicting or removing or otherwise penalizing a victim who is a tenant or lawful occupant. If victim cannot establish eligibility, the landlord must give a reasonable amount of time to find new housing or establish eligibility under another covered housing program.

New housing protections in VAWA 2013 includes the requirement that each appropriate agency develop a notice of rights under VAWA for tenants and provide such notice at the time a person applies for housing, when a person is admitted as a tenant of a housing unit, and when a tenant is threatened with eviction or termination of housing benefits.

VAWA 2013 requires each ESG RRH Provider to adopt a transfer plan for use by owners or managers of housing. Tenants must request a transfer and reasonably believe that they are threatened with imminent harm from further violence if the tenant remains in the same unit.

Some of the critical components of the final rule include:

- **Extension of the core protections to Continuum of Care (CoC), Emergency Solutions Grants (ESG) and Housing Opportunities for Persons With AIDS (HOPWA)** – The rule codifies the core protection across HUD’s covered programs ensuring survivors are not denied assistance as an applicant, or evicted or have assistance terminated as a tenant, because the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, and stalking.
- **Emergency transfers** – One of the key elements of VAWA’s housing protections is the emergency transfer plan which allows for survivors to move to another safe and available unit if they fear for their life and safety. The final rule includes a model emergency transfer plan, which was required in VAWA 2013, and an emergency transfer request form.
- **Protections against denials, terminations, and evictions that directly result from being a victim of domestic violence, dating violence, sexual assault, or stalking** – Survivors often face denial, termination, or eviction from housing for a reason that seems unrelated to being a survivor (such as poor rental history or poor credit), but is actually a direct result of being a survivor of domestic violence, dating violence, sexual assault or stalking. For example, as part of an act of domestic violence an abuser may cause damage to the survivor’s apartment, which in turn may cause the survivor to be evicted and have a poor rental history. Or stalking may involve taking out credit cards in a person’s name and misusing them to cause the person emotional distress, and the misuse of those cards may cause the person to have poor credit. To protect survivors in situations like these, the final rule prohibits any denial, termination, or eviction that is “a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the applicant or tenant otherwise qualifies for admission, assistance, participation, or occupancy.”
- **Low-barrier certification process** – The final rule makes it clear that under most circumstances, a survivor need only to self-certify in order to document the domestic violence, dating violence, sexual assault, or stalking, ensuring third party documentation does not cause a barrier in a survivor expressing their rights and receiving the protections needed to keep themselves safe. The rule includes a certification form that may be used by covered housing providers.

ELIGIBILITY AND NON-DISCRIMINATION (SECTION 109). The Subrecipient shall not employ discriminatory practices in the provision of services, employment of personnel, or in any other respect on the basis of race, color, religion, sex, gender identity, national origin, ancestry, or physical or mental handicap, or age as more specifically set forth in 24 CFR 576.407 which requires compliance with the non-discrimination and equal opportunity requirements at 24 CFR 5.105(a), Section 504 of the Rehabilitation Act, Title II and III of the Americans with Disabilities Act.

The Subrecipient must take steps to ensure effective communication with individuals with disabilities. Subrecipients must provide appropriate auxiliary aids and services necessary to ensure effective communication (e.g., Braille, audio, large type, assistive listening devices, and sign language interpreters.)

CIVIL RIGHTS COVENANT. As provided in 24 CFR 5.105 and 570.602, and depending upon the type and nature of the grant of ESG funds, this program is subject to the requirements of Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and Title VIII of the Civil Rights Act of 1968 (P.L. 90-284) and HUD regulations. Subrecipient certifies that its activities under this Contract shall be conducted and administered in conformity with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and Title VIII of the Civil Rights Act of 1968 (P.L. 90-284) and that it will comply with the other provisions of Title 24 of the CFR and with other applicable laws, to the full extent of their application. Further pursuant to Executive Order 11063 (as amended pursuant to Executive Order 12259) set out in 24 CFR Part 107, in the sale, lease or other transfer of land acquired, cleared or improved with assistance provided under the Contract, Subrecipient shall cause or require a covenant running with the land to be inserted in the deed or lease for such transfer, prohibiting discrimination upon the basis of race, color, religion, sex, gender identity or national origin, in the sale, lease or rental, or in the use or occupancy of such land or any improvements erected or to be erected thereon, and providing that SHRA and the United States are beneficiaries of and entitled to enforce such covenant. Subrecipient, in undertaking its obligation in carrying out the program assisted hereunder, shall take such measures as are necessary to enforce such covenant and shall not itself so discriminate. In addition, the Subrecipient must take reasonable steps to ensure meaningful access to programs to persons with limited English proficiency (LEP), pursuant to Title VI of the Civil Rights Act of 1964, as amended from time to time.

ARCHITECTURAL BARRIERS ACT. The Subrecipient shall comply with the Architectural Barriers Act of 1968 (42 USC 4151), as applicable, which Act requires that the design of any facility, except a private residence, that is constructed, renovated, remodeled or rehabilitated with funds received pursuant to this Contract shall comply with the

"American Standard Specification for Making Buildings and Facilities Accessible, and Usable by, the Physically Handicapped", as described in 41 U.S.C.F.R. 10119.6, and Subrecipient shall cooperate with SHRA in its inspections pursuant to such provisions.

SECTION 504 OF THE REHABILITATION ACT. The Subrecipient shall comply with the Act which prohibits discrimination on the basis of disability under any program or activity receiving Federal financial assistance.

FAIR HOUSING REQUIREMENTS. Fair Housing laws apply to SHRA ESG-funded programs. The ESG program provider shall market housing and supportive services to eligible persons regardless of race, color, national origin, religion, sex, gender identity, age, familial status, or handicap. While participants must address barriers to housing retention and should be encouraged to engage in services, ESG-funded program providers may not require participation in disability-related services as a condition of receiving assistance. Housing Stability Plans must not contain predetermined therapeutic goals related to participants' disabilities.

41. HOMELESS DEFINITION §576.2

Reminder, each household must have an executed Homeless Certification (**Attachment H**) in their file.

To enter the program, an individual, household/family, or roommates, must meet one of the following categories of HUD's Homeless Definition:

- **Category 1** (Literally homeless)
 - Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - 1) Has a primary nighttime residence that is a public or private place not meant for human habitation;
 - 2) Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs);
 - 3) or (iii) Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
- **Category 4** (Fleeing/Attempting to Flee Violence and living in a place described in Category 1)

- Any individual or family who:
 - 1) Is fleeing, or is attempting to flee, domestic violence;
 - 2) Has no other residence; and
 - 3) Lacks the resources or support networks to obtain other permanent housing

At Prevention program entry (must receive SHRA written approval before program entry) the household's gross annual income must be at or below 30 percent of Area Median Income (AMI) and meet one of the following HUD definition:

- **Category 2 (Imminent Risk of Homelessness)**
 - See Definition, page 18.
- **Category 3 – Homeless Under Other Federal Statutes**
 - 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; and
 - Certification of no permanent housing in the last 60 days; and
 - 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; and
 - Documentation of special needs or two or more barriers.
- **Category 4 – Fleeing/Attempting to Flee Domestic Violence**
 - Any individual or family who:
 - Is fleeing, or is attempting to flee, domestic violence;
 - Has no other residence; and
 - Lacks the resources or support networks to obtain other permanent housing

The ESG Provider must follow SSF's policies and procedures on entering (and exiting) program participants into HMIS. The enrollment date is when the participant is told they are eligible for the ESG RRH Program per Sacramento Steps Forward guidelines.

42. CHRONICALLY HOMELESS DEFINITION

In December 2015, HUD issued the Final Rule for Chronically Homeless for **Part 91 - Consolidated Submissions for Community Planning and Development Programs**, the authority citation for 24 CFR part 91 reads as follows: **Authority:** 42 U.S.C. 3535(d), 3601-3619, 5301-5315, 11331-11388, 12701-12711, 12741-12756, and 12901-12912.

As stated in the Final Rule, in §91.5, the definition of “Chronically homeless” is revised to read as follows:

§ 91.5 Definitions.

Chronically homeless means:

- 1) A “homeless individual with a disability,” as defined in section 401(9) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11360(9)), who:
 - i. Lives in a place not meant for human habitation, a safe haven, or in an emergency shelter; and
 - ii. Has been homeless and living as described in paragraph (1)(i) of this definition continuously 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 as described in paragraph (1)(i). Stays in institutional care facilities for fewer than 90 days will not constitute as a break in homelessness, but rather such stays are included in the 12-month total, as long as the individual was living or residing in a place not meant for human habitation, a safe haven, or an emergency shelter immediately before entering the institutional care facility;
- 2) An individual who has been residing in an institutional care facility, including a jail, substance abuse or mental health treatment facility, hospital, or other similar facility, for fewer than 90 days and met all of the criteria in paragraph (1) of this definition, before entering that facility; or
- 3) A family with an adult head of household (or if there is no adult in the family, a minor head of household) who meets all of the criteria in paragraph (1) or (2) of this definition, including a family whose composition has fluctuated while the head of household has been homeless.

43. OTHER DEFINITIONS

Please refer to 24 CFR 576.2 for definitions of terms used in the ESG Program. A summary of key definitions used within this Desk Guide is provided below.

At risk of homelessness means:

An individual or family who:

- 1) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
- 2) Does not have sufficient resources or support networks, *e.g.*, family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in this section; and
- 3) Meets one of the following conditions:
 - a) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - b) Is living in the home of another because of economic hardship;
 - c) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - d) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
 - e) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
 - f) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
 - g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- 4) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- 5) A child or youth who does not qualify as “homeless” under this section, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42

U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Consolidated Plan means a plan prepared in accordance with 24 CFR part 91. An *approved consolidated plan* means a consolidated plan that has been approved by HUD in accordance with 24 CFR Part 91.

Continuum of Care means the 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 service providers; mental health agencies; hospitals; universities; affordable housing developers; law enforcement; organizations that serve homeless and formerly homeless veterans, and homeless and formerly homeless persons that are organized to plan for and provide, as necessary, 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.

Disabling Condition - HUD defines a disabling condition as: (1) A disability as defined in Section 223 of the Social Security Act; (2) a physical, mental, or emotional impairment which is (a) expected to be of long-continued and indefinite duration, (b) substantially impedes an individual's ability to live independently, and (c) of such a nature that such ability could be improved by more suitable housing conditions; (3) a developmental disability as defined in section 102 of the Developmental Disabilities Assistance and Bill of Rights Act; (4) the disease of acquired immunodeficiency syndrome or any conditions arising from the etiological agency for acquired immunodeficiency syndrome; or (5) a diagnosable substance abuse disorder.

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. Any project funded as an emergency shelter under a Fiscal Year 2010 Emergency Solutions grant may continue to be funded under ESG.

Fair Market Rent (FMR) – determined by HUD annually as the 40th percentile of gross rents for typical, non-substandard rental units occupied by recent movers in a local housing market.

HEARTH Act - The Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009, which consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program, and revises the Emergency Shelter Grants program and renames it as the Emergency Solutions Grants (ESG) program. The HEARTH Act also codifies into law the Continuum of Care planning process, a longstanding part of HUD's application

process to assist homeless persons by providing greater coordination in responding to their needs.

Homeless means:

- 1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - a) An individual or family 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) An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals); or
 - c) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution;
- 2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - a) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - b) No subsequent residence has been identified; and
 - c) The individual or family lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- 3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - a) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - b) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

- c) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
 - d) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- 4) Any individual or family who:
- a) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
 - b) Has no other residence; and
 - c) Lacks the resources or support networks, *e.g.*, family, friends, faith-based or other social networks, to obtain other permanent housing.

Homeless Management Information System (HMIS) means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

Housing First – a philosophy of providing housing to homeless individuals that focuses on providing services to individuals once they are in housing to assure housing stability and does not require sobriety, medication compliance or agreement to participate in specific services as a condition of receiving assistance.

Housing Stability Case Management – case management provided to households receiving rapid rehousing assistance which may or may not be linked to short- or medium- term rental assistance and other financial assistance. Housing stability case management focuses on addressing the immediate need for housing, stabilizing families and individuals in housing and connecting households to mainstream resources to ensure long term housing sustainability.

Housing Search and Placement – assistance to specifically identify and place households in appropriate, affordable housing for households receiving rapid re-housing assistance. This includes connecting households with properties that have low barriers to accessing housing,

negotiating fees, facilitating move in dates and identifying appropriate areas for housing based on household wants and needs.

Metropolitan City means a city that was classified as a metropolitan city under 42 U.S.C. 5302(a) for the fiscal year immediately preceding the fiscal year for which ESG funds are made available. This term includes the District of Columbia.

Participant Share – the amount of monthly contribution a household enrolled in rapid re-housing must contribute to rent.

Permanent Supportive Housing – deeply affordable housing with comprehensive services that are voluntary and tenant-centered.

Permanent Housing – housing that does not have occupancy limits. This can include market rental housing, subsidized housing, supportive housing and other types of housing where individual tenants hold a lease.

Private nonprofit organization means a private nonprofit organization that is a secular or religious organization described in section 501(c) of the Internal Revenue Code of 1986 and which is exempt from taxation under subtitle A of the Code, has an accounting system and a voluntary board, and practices nondiscrimination in the provision of assistance. A private nonprofit organization does not include a governmental organization, such as a public housing agency or housing finance agency.

Program income shall have the meaning provided in 24 CFR 85.25. Program income includes any amount of a security or utility deposit returned to the recipient or subrecipient.

Program participant means an individual or family who is assisted under ESG program.

Program year means the consolidated program year established by the recipient under 24 CFR part 91.

Recipient means any State, territory, metropolitan city, or urban county, or in the case of reallocation, any unit of general purpose local government that is approved by HUD to assume financial responsibility and enters into a grant agreement with HUD to administer assistance under this part.

State means each of the several States and the Commonwealth of Puerto Rico

Subrecipient means a unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

Territory means each of the following: the Virgin Islands, Guam, American Samoa, and the Northern Mariana Islands.

Unit of general purpose local government means any city, county, town, township, parish, village, or other general purpose political subdivision of a State.

Urban county means a county that was classified as an urban county under 42 U.S.C. 5302(a) for the fiscal year immediately preceding the fiscal year for which ESG funds is made available.

Victim service provider means 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.

44. DEFINITION OF A HOUSEHOLD

The Equal Access Rule provides that recipients of HUD funds, including recipients and subrecipients of CoC and ESG Program funds must serve individuals/families as they present regardless of marital status, actual or perceived sexual orientation, or gender identity. For HUD's homeless assistance programs, this means a family is defined as a group of persons residing together, and such group includes, but is not limited to per §5.403 Definitions:

Disabled family means a family whose head (including co-head), spouse, or sole member is a person with a disability. It may include two or more persons with disabilities living together, or one or more persons with disabilities living with one or more live-in aides.

Displaced family means a family in which each member, or whose sole member, is a person displaced by governmental action, or a person whose dwelling has been extensively damaged or destroyed as a result of a disaster declared or otherwise formally recognized pursuant to Federal disaster relief.

Elderly family means a family whose head (including co-head), spouse, or sole member is a person who is at least 62 years of age. It may include two or more persons who are at least 62 years of age living together, or one or more persons who are at least 62 years of age living with one or more live-in aides.

Family includes, but is not limited to, the following, regardless of actual or perceived sexual orientation, gender identify or marital status:

- 1) A single person, who may be an elderly 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;
- f. The remaining member of a tenant family (does not include live-in aide(s)).

Live-in aide is not considered a member of the family but means a person who resides with one or more elderly persons, or near-elderly persons, or persons with disabilities, and who:

- 1) Is determined to be essential to the care and well-being of the persons;
- 2) Is not obligated for the support of the persons; and
- 3) Would not be living in the unit except to provide the necessary supportive services.

Near-elderly family means a family whose head (including co-head), spouse, or sole member is a person who is at least 50 years of age but below the age of 62; or two or more persons, who are at least 50 years of age but below the age of 62, living together; or one or more persons who are at least 50 years of age but below the age of 62, living with one or more live-in aides.

Person with disabilities:

- 1) Means a person who:
 - a. Has a disability, as defined in [42 U.S.C. 423](#);
 - b. Is determined, pursuant to HUD regulations, to have a physical, mental, or emotional impairment that:
 - 2) Is expected to be of long-continued and indefinite duration;
 - 3) Substantially impedes his or her ability to live independently, and
 - 4) Is of such a nature that the ability to live independently could be improved by more suitable housing conditions; or
- 5) Has a developmental disability as defined in [42 U.S.C. 6001](#).
- 6) Does not exclude persons who have the disease of acquired immunodeficiency syndrome or any conditions arising from the etiologic agent for acquired immunodeficiency syndrome;
- 7) For purposes of qualifying for low-income housing, does not include a person whose disability is based solely on any drug or alcohol dependence; and
- 8) Means “individual with handicaps”, as defined in §8.3 of this title, for purposes of reasonable accommodation and program accessibility for persons with disabilities.

Further, the CoC and ESG Program interim rules establish initial eligibility requirements that program participants must meet in order to receive services under a particular program component (e.g., for RRH assistance funded through the ESG Program, the program participant must be defined at program entry as homeless under Category 1 or Category 4 of the homeless definition).

Further, the CoC and ESG Program interim rules establish initial eligibility requirements that program participants must meet in order to receive services under a particular program component (e.g., for RRH assistance funded through the ESG Program, the program participant must be defined at program entry as homeless under Category 1 or Category 4 of the homeless definition).

45. DEFINITION OF SHARED HOUSING – SEPARATE HOUSEHOLDS/ROOMMATES

Each roommate will have a separate lease. Where income must be calculated – either for purposes of eligibility, re-assessment or for determining the amount of rent paid – the ESG RRH Provider must consider the income of each individual as a separate household.

The ESG Program interim rule does not prescribe the type of housing that would qualify as permanent housing and thus allows for shared housing/roommate situations in rapid re-housing. However, participants in shared housing/roommate situations, there are certain requirements that must be met, and other considerations to keep in mind:

Each household being assisted with ESG rental assistance must have its own separate lease with the property owner to be considered a separate household for the purposes of ESG eligibility (note: subleases are not allowed under ESG). However, providing housing relocation and stabilization services and financial assistance does not require the program participant to have a lease.

As with all tenant-based rental assistance, it is up to the program participant to select a housing unit in which to live and the people with which they will share that housing (if any).

A habitability inspection is required for the unit into which the program participant will be moving - EVEN IF only services are provided. This will help ensure that the individual or family has adequate space and security for themselves and their surroundings, and that the unit is generally habitable (§576.403(c)). Doing this inspection may also help the ESG RRH Provider assess whether this can be a permanent living situation for the homeless household.

All housing for which leasing or rental assistance payments are made must meet FMR and rent reasonableness standards. Rent reasonableness should be determined by considering the reasonableness of the rent in relation to rents being charged for comparable unassisted units, taking into account the location, quality, size, type, and age of unit, as well as any amenities, housing services, maintenance, and utilities provided by the owner. (Note: The FMR for shared housing is the lower of the FMR for the family unit size or the pro-rata share of the FMR for the shared housing unit size. The pro-rata share is calculated by dividing the number of bedrooms

available for occupancy by the assisted family in the private space by the total number of bedrooms in the unit. For example, in the case of a single person household renting one room in a 4 bedroom house, the FMR used would be the lower of the 1-bedroom FMR or the pro-rata share of the 4-bedroom FMR (1/4 of the 4 bedroom FMR).

46. DEFINITION OF MIXED-ELIGIBILITY HOUSEHOLDS

When a group of individuals identifies as a family and presents as a family for assistance, they must be offered assistance together, as a family. Where members of the family have not been residing together prior to presenting for assistance (e.g., one parent in an emergency shelter and the other parent with children with friends, or other varying combinations), eligibility must be assessed using the adult head of household's (or minor head of household where no adult is present) homeless status. Where there is more than one adult present in the family, the family chooses which adult is the head of household. For example, in the ESG Program, this means that if one adult household member meets the criteria for Category 1 of the homeless definition (and identifies as the head of household) and would be eligible for Rapid Re-housing assistance, the whole family can be eligible for Rapid Re-housing assistance and no income check is required at initial intake.

Where income must be calculated – either for purposes of eligibility, re-assessment or for determining the amount of rent paid – recipients and subrecipients must consider the income of all family members that present for assistance.

The user should note that it is their responsibility to ensure that all federal regulations, Notices, etc. are followed and should consult OneCPD Resource Exchange for the most up-to-date information regarding the program.

**ATTACHMENT A: HOMELESS AND AT-RISK OF HOMELESSNESS
DEFINITIONS**

ATTACHMENT B: SNAPS-Shots

ATTACHMENT C: SHELTER AND HOUSING STANDARDS

ATTACHMENT D: HMIS DATA STANDARDS

ATTACHMENT E: ESG DATA STANDARDS AND REPORTING

ATTACHMENT F: 24 CFR Part 576-EMERGENCY SOLUTIONS GRANTS PROGRAM

**ATTACHMENT G: USING IDIS ONLINE FOR THE EMERGENCY SOLUTIONS
GRANTS PROGRAM**

ATTACHMENT H: HOMELESS CERTIFICATION

ATTACHMENT I: VAWA FORMS