

Emergency Solutions Grant ND Homeless Grant Recipient Training

JULY 2023



Award Terms



Contract Start Date July 1, 2023



Contract End Date June 30, 2023



No expenditures incurred prior to July 1, 2023 can be reimbursed using 2023 Program Funds.



ESG Environmental Review requirements must be satisfied prior to committing ESG funds.



Financial Award is reimbursement only.



No reimbursements until a Grant Agreement, Financial Award, W-9, ACH Form, and Program Staff List are received.



Awards will not be automatically renewed.

Financial Award/Grant Agreement Terms

- Practice and Post Non-Discrimination Policies
- Include Fair Housing and ADA Logos on ALL Informational Material.
- Maintain and Implement Drug Free Workplace Policy
- Avoid Conflicts of Interest



North Dakota-500 Statewide Continuum of Care

Written Standards for Emergency Solutions Grant and Continuum of Care Programs

CoC Board Approval: April 2023
CoC Membership Approval: May 2023
Dept. Of Commerce Approval: April 2023 (pending)
Next Review: April 2024



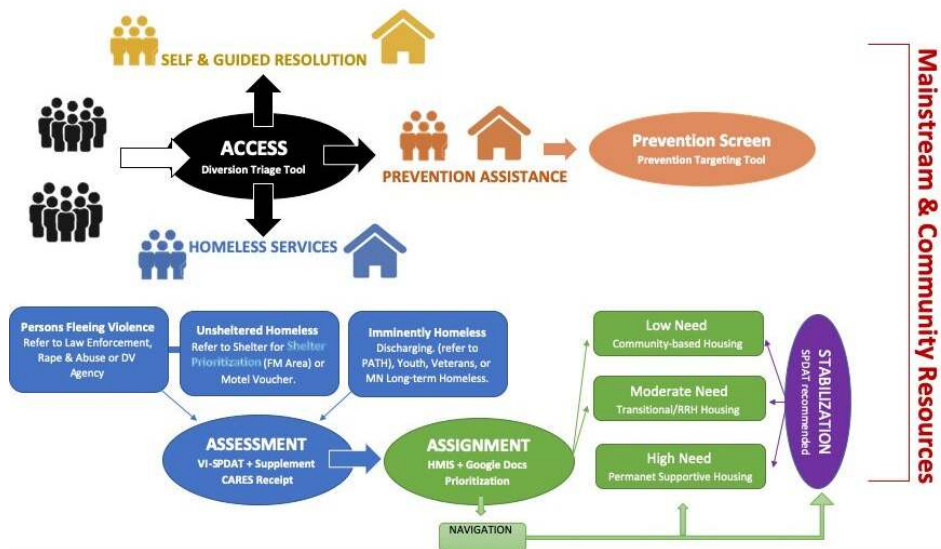
EMERGENCY SOLUTIONS GRANTS Administrative Manual



Written Policies and Procedures

- Written Standards for ESG and CoC
- NDHFA Administrative Manual (Am)
- Organizational Policy and Procedure
 - All Program Requirements (Pg. 11)
 - Program Activities
 - Correspond to Written Standards and Administrative Manual

Coordinated Entry and HMIS



- Data on all persons served and all activities assisted under ESG and NDHG are entered into HMIS or the CoC approved comparable database.
- Coordinated Access, Referral, Entry & Stabilization (CARES) System

Other Program Requirements

Homeless Participation

Continuum of Care (CoC)

Affirmative Outreach

Faith-Based Activities

Low-Barrier

Housing First

Environmental Review


Lead Based Paint

Match

ESG Match (page 27)

- ESG funds must be matched dollar for dollar.
- Matching funds contributed must be used for allowable ESG costs and activities.
 - Example, NDHG funds that support 50% AMI households would not qualify as match.

If using salary of employees as match, include the following source documents with your match reporting

- Name of Employee
 - Title of position
 - Amount of salary
 - Funding source
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Reimbursement Requests (page 23)

Reimbursement requests are required at least once every 90 days.

- Monthly requests will be accepted.
- Complete Request For Funds SFN 52681
- Complete Reimbursement Request Summary SFN 62333
- Supporting documentation includes invoice and proof of payment.
 - Review ESG Required Supporting Documentation Guidance

- Salary (page 24)
 - Time sheet SFN 62211
 - Hours must be billable by program component.
 - Include explanation of fringe calculations- required with initial salary request only.

Levels of Review

What are the Levels of Review?

The three levels of review most common for CoC Program and ESG Program projects are:

- **Exempt or Categorically Excluded Not Subject to 58.5 (CENST)** – For projects without any new environmental risks or impacts, including tenant-based rental assistance, tenant-based leasing, supportive services, and administrative costs, including leasing office or emergency shelter space
- **Categorically Excluded Subject to 58.5 (CEST)** – For projects with minor new risks and impacts, including project-based rental assistance and minor rehab
- **Environmental Assessment (EA)** – For any projects that include larger environmental impacts such as major rehabilitation, new construction, and demolition

Environmental Review (ESG)

Environmental Review (Continued)

HUD Matrix <https://files.hudexchange.info/resources/documents/Levels-of-Environmental-Review-for-ESG-Components-Matrix.pdf>

Emergency Shelter Operations/Essential Services- CENST ** so long as no repairs or minor rehabilitation.

Emergency Shelter Leasing Shelter Space- CEST

Rapid Rehousing/Homeless Prevention- Service Cost, Financial Assistance, TBRA- CENST at unit level

Project Based Rental Assistance – CEST

Leasing Office Space- CEST

HMIS Lead- EXEMPT

Program Components

- Street Outreach
- Emergency Shelter
- Homeless Prevention
- Rapid Rehousing
- HMIS

Street Outreach

Costs are limited to the costs of:

- Providing essential services necessary to reach out to **unsheltered homeless people**;
- Connecting unsheltered homeless people with emergency shelter, housing, or critical services; and providing urgent, non-facility- based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility.

Services are provided on the street, or in parks, abandoned buildings, bus stations, campgrounds, and other unsheltered settings.

Documentation Requirement

- Street Outreach caseworkers should keep documentation of daily activities in the form of a calendar, log or generalized case notes.
- The order of priority for obtaining evidence of homelessness is as follows: third-party documentation first, intake worker observations second, and certification from the person seeking assistance third.

You must retain supporting documentation for all costs charged to the ESG or NDHG Grants

Emergency Shelter (page 51)

- The ESG Program Interim Rules do not require recipients to disqualify individuals or families based on criminal history, including sex offenders. HUD requires only that all program participants meet the minimum eligibility criteria and that recipients comply with all local and federal requirements.
- For site-based projects (e.g., emergency shelters), it is possible that an individual or family may be screened out based on a background check (e.g., if the individual is a registered sex offender and cannot live near children and the site has a household with children residing in it). However, HUD encourages recipients or subrecipients to work with the individual or family presenting for assistance to identify another appropriate housing placement.
- Prohibition against involuntary family separation. The age, of a child under age 18 must not be used as a basis for denying any family's admission to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18.

Emergency Shelter

Gender Identity

HUD assumes that a grantee will make decisions about eligibility for or placement into single-sex emergency shelters in a shelter that corresponds to the gender with which the person identifies, taking health and safety concerns into consideration.


A client's or potential client's own views with respect to personal health and safety should be given serious consideration in making the placement.

For instance, if the potential client requests to be placed based on his or her sex assigned at birth, HUD assumes that the provider will place the individual in accordance with that request.

HUD assumes that a provider will not make an assignment or re-assignment based on complaints of another person when the sole stated basis of the complaint is a client or potential client's non-conformance with gender stereotypes.

NOTICE- BEFORE REIMBURMSENT

EMERGENCY SHELTER MUST

- Complete a Section 504 Evaluation
 - Conduct Minimum Habitability Standards- Emergency Shelter SFN 62377
 - Environmental Review
 - Lead Screening Worksheet SFN 62378
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Essential Services (page 60)




What Services Can Be Provided?

The following table summarizes and compares the essential services allowable under each component:

Street Outreach	Emergency Shelter
Engagement	--Not eligible--
Case Management	Case Management
--Not eligible--	Child Care
--Not eligible--	Education Services
--Not eligible--	Employment Assistance/Job Training
Emergency Health Services	Outpatient Health Services
--Not eligible--	Legal Services
--Not eligible--	Life Skills Training
Emergency Mental Health Services	Mental Health Services
--Not eligible--	Substance Abuse Treatment Services
Transportation	Transportation
Services for Special Populations	Services for Special Populations

Services eligible under the Emergency Shelter component are more expansive than the Street Outreach component because of the population being served and where they are located. Be sure to review the [ESG Program Interim Rule](#) for detailed descriptions of the essential service costs that are eligible under each

Homeless Prevention and Rapid Rehousing (page 62-63)

ELIGIBLE ACTIVITIES: RAPID RE-HOUSING AND HOMELESSNESS PREVENTION COMPONENTS	
<p>Rental Assistance° 24 CFR §576.106</p> 	<ul style="list-style-type: none"> • Short-term rental assistance (0-3 months) • Medium-term rental assistance (4-24 months) • Rental arrears (One-time payment for up to 6 months of rent in arrears) <p><i>Any combination of the above types, so long as the total amount of assistance does not exceed 24 months</i></p> <p>°Rental assistance can be project-based or tenant-based.</p>
<p>Housing Relocation and Stabilization Services</p>	<p>Financial Assistance 24 CFR §576.105</p>  <ul style="list-style-type: none"> • Rental Application Fees (when charged by owner to all applicants) • Security Deposits (no more than 2 month's rent) • Last Month's Rent (applies to 24-month cap) • Utility Deposits (when required by utility company for all customers) • Utility Payments (up to 24 months of payments per service, including up to 6 months of arrears per service) • Moving Costs (e.g., truck rental, moving company, up to 3 months of storage)
	<p>Services 24 CFR §576.105</p>  <ul style="list-style-type: none"> • Housing Search and Placement • Housing Stability Case Management • Mediation • Legal Services • Credit Repair (e.g., budgeting/ money management)

Participant Eligibility

Initial Evaluation of Eligibility:

Requirements for Homelessness Prevention – Initial Evaluation

Individual or family who meets one of the following categories of HUD's **Homeless Definition** at §576.2, **AND** has an annual income below 30% of median family income for the area:

- **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

Individual or family who meets one of the three categories of HUD's **At Risk of Homelessness Definition** at §576.2, **AND** has an annual income below 30% of median family income for the area:

- **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 §576.2, but who do qualify as homeless under Section 725(2) of the McKinney-Vento Homeless Assistance Act)

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

Note: 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.

Requirements for Rapid Re-Housing – Initial Evaluation

Individual or family who meets one of the following categories of HUD's **Homeless Definition** at §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 and families have no other residence AND lack the resources and support networks to obtain other permanent housing.

Re-Evaluations of Eligibility

While program participants receiving Homelessness Prevention assistance must be re-evaluated at least once every three months, program participants receiving Rapid Re-Housing assistance must only be re-evaluated at least once annually, unless the recipient/subrecipient requires more frequent re-evaluations. The chart below summarizes the ESG re-evaluation requirements. (See the [ESG regulation](#) at §576.401(a)-(c)).

Re-Evaluations of Eligibility		
Component	Frequency	Requirements
Rapid Re-Housing	Eligibility and types/amounts of assistance must be re-evaluated not less than once annually .	At a minimum, each re-evaluation must establish and document: <ul style="list-style-type: none">• The program participant does not have an annual income that exceeds 30% of median family income for the area.• The program participant lacks sufficient resources and support networks necessary to retain housing without ESG assistance.
Homelessness Prevention	Eligibility and types/amounts of assistance must be re-evaluated not less than once every 3 months .	

Third-Party Documentation

Staff/Intake Worker
Observation – SFN 62381

Certification From Person
Seeking Assistance – SFN
60319

Priority for
Verification
of Homeless
Status

Intake, Income Eligibility, Re-Certification

(page 70)

Emergency Shelter, Street Outreach

- Verification of homelessness. No Income Eligibility Requirements

CARES Housing Crisis Triage

- Complete with any households that presents in a housing crisis.

Housing Prioritization Tool

- Complete after triage with clients who are literally homeless or at-risk and unable to self resolve.

HMIS ESG/NDHG Intake Forms

- Complete when entering into ESG/NDHG project.

Income Eligibility (Page 72)

Homeless Prevention

- ESG 30% AMI
- NDHG 50% AMI
- Initial and Re-certification every 90 days

Rapid Rehousing

- No income at initial
- Recertification annually

Rental Assistance Requirements

Subrecipient Policy Requirements

- Standards for determining what percentage or amount of rent and utilities each program participant must pay while receiving assistance.
- Standards for determining how long a particular program participant will be provided with rental assistance and how that assistance may be adjusted over time.
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services, maximum amount of assistance; or the maximum number of months a participant may receive assistance; or the maximum number of times a participant may receive assistance.



Rental Assistance Requirements (Page 77)



Rental Assistance Agreement SFN 62097



Rent Reasonableness Checklist and Certification SFN 59386



Housing Habitability SFN 61266



Lead Screening Worksheet SFN 62378



Lead Based Paint Visual Assessment SFN 62379

Lead Based Paint

All participant files must have the Lead Screening Worksheet

Staff who conduct habitability standards may conduct the visual assessment if required, but must have HUD training.

HUD Training <https://apps.hud.gov/offices/lead/training/visualassessment/h00101.htm>

- MUST document the participant file that LBP was addressed, even if determined not applicable.

Rental Assistance Requirements

Fair Market Rent

- Maximum amount a participant may pay for a rental unit.

Late Payments

- Subrecipient is responsible for timely payment of rent. Late charges may not be paid with ESG or NDHG funds.

Use With Other Subsidies

- ESG or NDHG funds may not be provided to a household who receives the same type of assistance from another source for the same period of time, except if that assistance is the tenants portion of arrears.
- Funds may not be provided to a program participant who receives funds under URA.
- Funds MAY be provided to participants who reside in Low Income Housing Tax Credit, HOME, Housing Trust Fund, or HIF units so long as those units do not have project based rental assistance.

Participant Files

Staff Determination of Eligibility SFN TBD

Identification Documentation

Homeless / At-Risk Homeless Certification and supporting documentation

Release of Information

Intake/Assessment Form

Case notes

Income Documentation

Self Certification SFN 60319

Staff Certification of Homelessness SFN 62381

Fair housing brochure

“How to Protect Your Family from Lead” pamphlet

Rental Assistance Agreement

Lease Agreement

Habitability Standards

Lead Based Screen Worksheet

Reporting

Mid-Term Progress Report SFN 52677 DUE January 31

Final Progress Report SFN 62161 DUE with final reimbursement request or 30 days following end of grant year.

SAGE Reporting- ESG Only Due July 31 (30 days)

Questions

ESG/NDHG Program Contact

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slsiegrist@nd.gov

HMIS Questions? Contact HMIS Help Desk: ndhmis@icalliances.org

ESG/NDHG Program Questions: Shared Mailbox: hfahomelessprograms@nd.gov

www.ndhfa.org

