

**EMERGENCY  
SOLUTIONS GRANT  
&  
NORTH DAKOTA  
HOMELESS GRANT**





# **THE QUESTION?**


**WHY DO EMERGENCY SOLUTIONS  
GRANT & NORTH DAKOTA HOMELESS  
GRANT SUBRECIPIENTS NEED TO  
HAVE WRITTEN DOCUMENTED  
STANDARDS AND PROCEDURES?**

# THE ANSWER!



**Housing and Urban Development (HUD) says ESG subrecipients need to have written standards and policies in place.**

**North Dakota Housing Finance Agency is requiring NDHG Grant subrecipients to have written standards and policies.**



**HUD SAYS, AND NDHFA  
AGREES! SUBRECIPIENTS  
MUST HAVE POLICES AND  
PROCEDURES FOR THE  
FOLLOWING REASONS:**

1. TO ENSURE THE REQUIREMENTS OF THE PROGRAMS ARE ACHIEVED.
2. POLICES AND PROCEDURES MUST BE WRITTEN DOWN AND IMPLEMENTED BY SUBRECIPIENTS TO ENSURE GRANT FUNDS ARE USED IN ACCORDANCE WITH GRANT REQUIREMENTS.

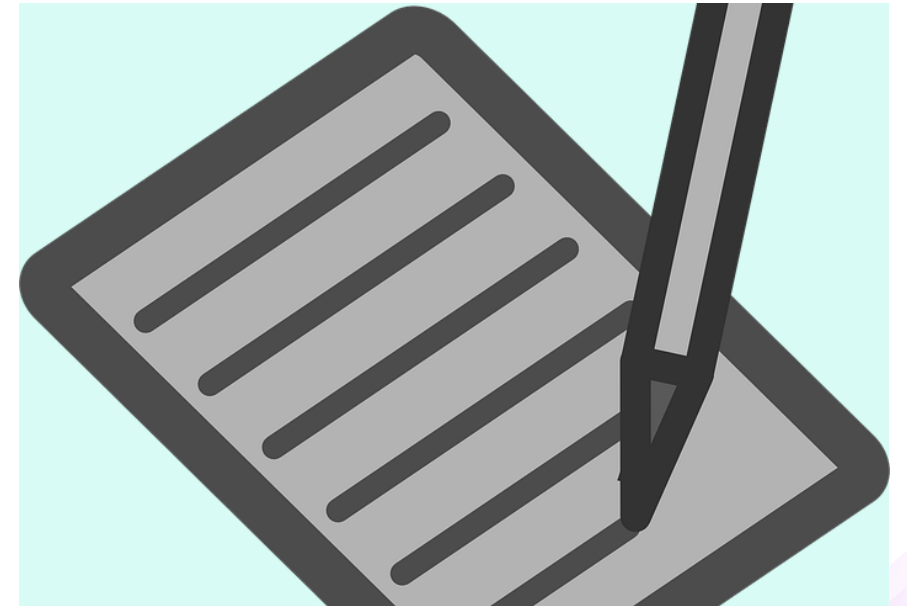
**SUBPART E—PROGRAM REQUIREMENTS**

**§ 576.400 AREA-WIDE SYSTEMS COORDINATION REQUIREMENTS.**

[HTTPS://WWW.ECFR.GOV/CURRENT/TITLE-24/SUBTITLE-B/CHAPTER-V/SUBCHAPTER-C/PART-576/SUBPART-E](https://www.ecfr.gov/current/title-24/subtitle-b/chapter-v/subchapter-c/part-576/subpart-e)

# **POLICIES AND PROCEDURES SHOULD....**

- Be written.
- Specify the steps staff need to follow when screening for eligibility.
- Include the documentation needed for the process.
- Must establish order of preference such as third-party documentation first.



# REQUIRED FOR ALL PROGRAMS

- **Written Operational Policies.**
- **Program Specific to the operations of each component of the subrecipient's grant.**
- **Subrecipients should have one manual for all ESG/NDHG program activities.**
- **Does not contain other information regarding any other grants, programs, or operations.**



# **AT A MINIMUM, WRITTEN STANDARDS MUST INCLUDE**

**1. Standard Policies  
and Procedures for  
evaluating eligibility for  
assistance.**

**Example:**

**The minimum eligibility  
process will include an  
initial phone call or in  
person screening.**

# AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE

**2. Coordination with other targeted homeless services.**

**§ 576.400 (B) and (c)**

**<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-576>**

**Example:**

**Rental assistance/housing supports working with victim service providers to provide services for homeless clients.**



# **AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE**

**3. Standards for targeting and providing essential services related to outreach if street outreach is a project component of the agencies grant.**

**Example:**

**What is the agency's plan to provide street outreach services for the homeless population.**

# AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE

The complete list of minimum standards specifically for Emergency Shelters

24 B Chapter V Subchapter C Part 776

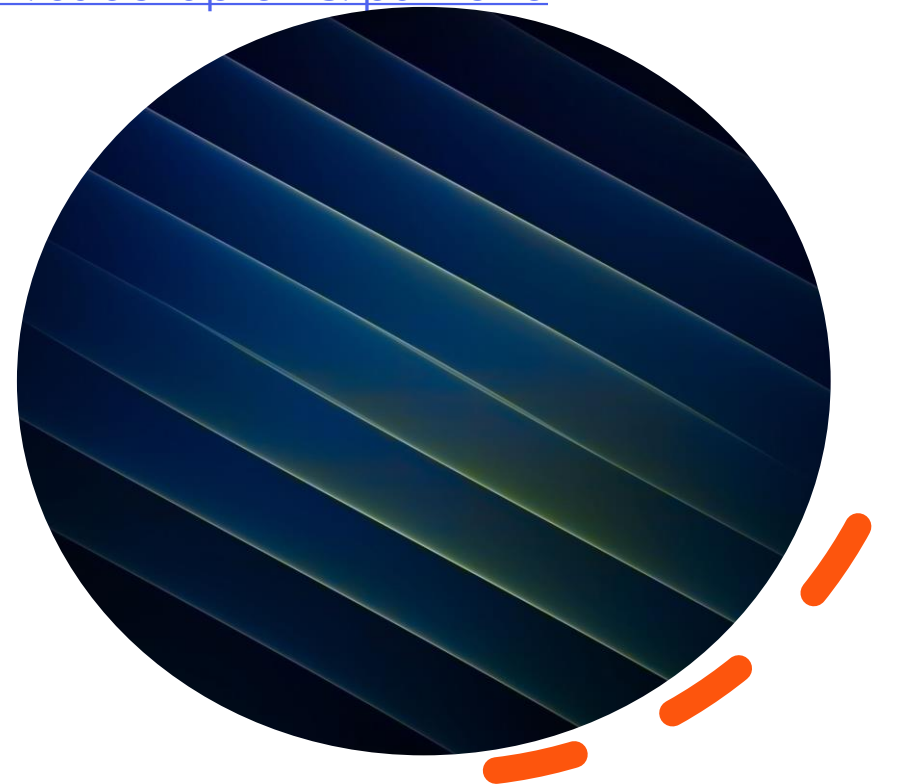
iii - V <https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-576>

4. Policies and procedures for admission, diversion, referral, etc for emergency shelters.

<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-576>.

Example:

The emergency shelter's policy for admitting families into the shelter.



# **AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE**

**5. Policies and procedures for determining and prioritizing which eligible families and individuals will receive homeless prevention and which will receive rapid rehousing (must also include emergency transfers). § 576.409**

**Example:**

**Agency will assess needs of the family to determine for which service they are eligible.**

# **AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE**

**6. Standards for determining what percentage or amount of rent and utilities each program participant must pay while receiving homelessness prevention or rapid re-housing assistance.**

## **Example:**

**Participants in both the rapid rehousing program will pay 10% of the rent and utilities for the first three months of the program and will increase 10% every three months thereafter.**

# **AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE**

**7. Standards for determining how long program participants will be provided rental assistance, and if the amount of assistance will be adjusted over time.**

## **Example:**

**Program participants will be provided rental assistance for a year. The first quarter of the program, participants will pay zero rent. Rent will increase every quarter by 25%.**

# **AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE**

**8. Participation in HMIS  
or victim services  
comparable database.**

**Example:**

**Entering all participants  
information into HMIS  
or an approved victim  
services comparable  
database to track data.**

**AT A  
MINIMUM,  
WRITTEN  
STANDARDS  
MUST  
INCLUDE**

**9. Low Barrier policies  
- a minimum number  
of expectations placed  
on program  
participants.**



**Example:  
Allowing people  
under the influence  
into emergency  
shelter.**



# FAIR HOUSING POLICY

**Fair Housing Policy needs the following language in the agency's policy and procedure manual:**

## **10. Fair Housing Policy**

- It is illegal to discriminate in the sale or rental of housing, including against individuals seeking a mortgage or housing assistance, or in other housing-related activities. The Fair Housing Act prohibits this discrimination because of race, color, national origin, religion, sex, familial status, and disability. A variety of other federal civil rights laws, including Title VI of the Civil Rights Act, Section 504 of the Rehabilitation Act, and the Americans with Disabilities Act, prohibit discrimination in housing and community development programs and activities, particularly those that are assisted with HUD funding. These civil rights laws include obligations such as taking reasonable steps to ensure meaningful access to their programs and activities for persons with limited English proficiency (LEP) and taking appropriate steps to ensure effective communication with individuals with disabilities through the provision of appropriate auxiliary aides and services. Various federal fair housing and civil rights laws require HUD and its program participants to affirmatively further the purposes of the Fair Housing Act.

**This must be written in your policy and procedure manual.**



# AT A MINIMUM, WRITTEN STANDARDS MUST INCLUDE

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## 11. Anti-Discrimination Policy

- This must ensure equal participation opportunity in homeless programs, without discrimination or harassment based on race, color, religion, sex, sexual orientation, gender identity or expression, age, disability, marital status, citizenship, genetic information or any other characteristic protected.

**This must be written in your policy and procedure manual.**



# AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE

## 12. Program Termination

- Per 24 CFR 576.402, if a program participant violates program requirements, their assistance may be terminated in accordance with a formal process established by the subrecipient, that recognizes the right of the individuals affected and allows for due process. The terminations of assistance policy must include a clearly outlined grievance and appeals process. The policy must include with who, how, and when the appeal can be filed. \_\_\_\_\_



# CONFIDENTIALITY

A white rectangular box with a red, distressed-style stamp that reads "CONFIDENTIAL". The stamp is tilted upwards from left to right. To the right of the box is a teal circle. The background of the slide is teal with a white diagonal striped pattern behind the box.

**CONFIDENTIAL**

## **13. Confidentiality**

The subrecipient must have procedures to ensure all records containing personal identifying information (as defined in HUD's standards for participation, data collection, and reporting in local HMIS and 24 CFR 576.500) of any individual or family who applies for and/or receives ESG/NDHG assistance will be kept secure and confidential.

# **AT A MINIMUM WRITTEN STANDARDS MUST INCLUDE**

## **14. Organization Program Description**

### **Must include:**

- **Program overview**
- **Program design**
- **Intake procedures**
- **Assistance time limit**
- **Program eligibility and the specific population served**

# **AT A MINIMUM, WRITTEN STANDARDS MUST INCLUDE**

## **15. Habitability Standards:**

- Subrecipients of Housing Stabilization Services (both rapid rehousing and homeless prevention components) are required (24 CFR 567.403) to conduct a habitability standards inspection on any unit receiving assistance. Subrecipients must certify that the unit has passed habitability standards before any ESG/NDHG funds may be released. In addition, an annual habitability standards inspection must be conducted for any unit which ESG/NDHG funds are being used.
- Subrecipients of Emergency Shelter Operations are required to conduct a habitability standards inspection yearly. The shelter must pass habitability standards before any ESG/NDHG funds may be released.

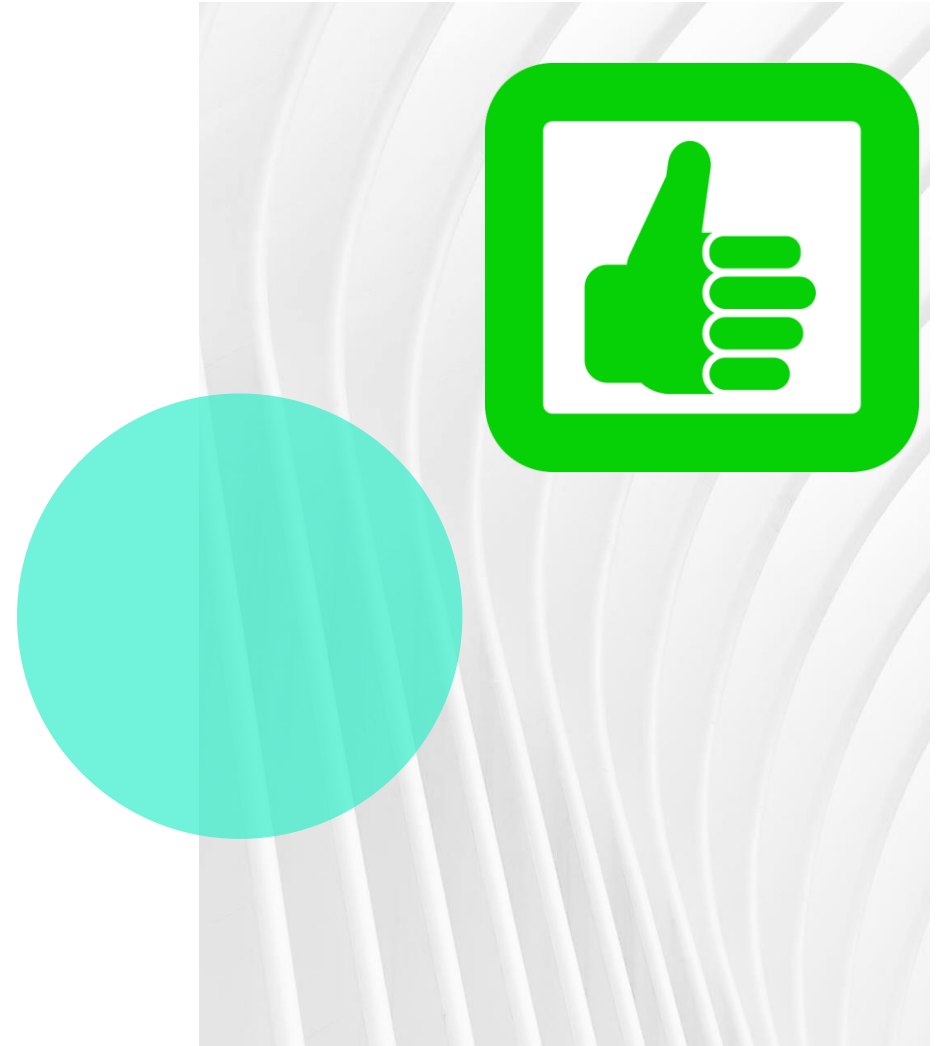


Standards

# IN SUMMARY

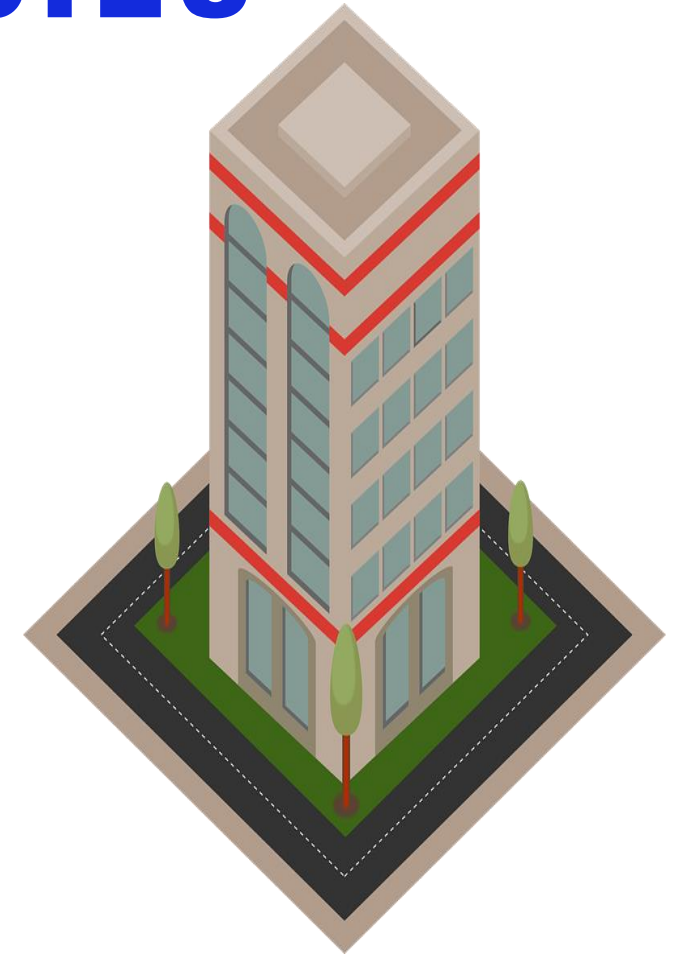
Each agency needs to have written policies and procedures for every program component of their ESG and NDHG grant.

This will help ensure that programs run smoothly while meeting HUD standards.



# OVERALL ORGANIZATION ESG/NDHG FOR POLICIES AND PROCEDURES **ALL AGENCIES**

1. Organization Mission
2. Housing Focus Policy (Housing First/Lower Barrier Policies)
3. Fair Housing Policy (Affirmatively Furthering Fair Housing Policy)
4. Anti-Discrimination Policy
5. Equal Access Policy
6. VAWA Policy
7. Appeals, Grievance Policy and Process
8. Termination of Assistance Policy
9. Confidentiality Policy
10. Record Keeping



# OVERALL ORGANIZATION ESG/NDHG FOR POLICIES AND PROCEDURES

**Break Down by Project  
Types**





# PROGRAM DESIGN & COMPONENT POLICIES STREET OUTREACH

1. Program Design or Overview  
(type of assistance offered)
2. Intake Procedures
3. Assistance Time Limit
4. Participant Eligibility Requirements
5. Specific Populations Served  
(if applicable)
6. Program Rules for the Participant



# **PROGRAM DESIGN & COMPONENT POLICIES** **EMERGENCY SHELTER**

1. Program Design or Overview
2. Intake Procedures
3. Assistance Time Limit
4. Participant Eligibility Requirements
5. Minimum Habitability Standards
6. Program Rules for Participants



# PROGRAM DESIGN & COMPONENT POLICIES RAPID REHOUSING

1. Program Design or Overview (type of assistance offered)
2. Intake Procedures
3. Assistance Time Limit
4. Participant Eligibility Requirements
5. Specific Populations Served
6. Case Management Expectations
7. Procedures for Determining Rental Assistance including determination of Participant share
8. Program Rules for Participants



# PROGRAM DESIGN & COMPONENT POLICIES HOMELESS PREVENTION

1. Program Design or Overview (type of assistance offered)
2. Intake Procedures
3. Assistance Time Limit
4. Participant Eligibility Requirements
5. Specific Populations Served
6. Case Management Expectations
7. Procedures for Determining Rental Assistance including  
Determination of Participant share
8. Program Rules for Participants



# RESOURCES USED

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**1. HUD Part 576 Emergency Solutions Grant Program 12 U.S.C. 1701x, 1701 x-1; 42 U.S.C. 11371 et seq., 42 U.S.C. 3535(d).**

<https://www.ecfr.gov/current/title-24/subtitle-B/chapter-V/subchapter-C/part-576>

**2. Emergency Solutions Grant and North Dakota Homeless Grant Administrative Manual  
North Dakota Housing Finance Agency**

<https://www.ndhfa.org/wp-content/uploads/2023/08/ESGNDHGAdminManual8.23.pdf>



## CONTACT INFORMATION

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For all the work you do  
helping people get housed!