

County of Riverside

ESG WRITTEN STANDARDS

Outreach Services
Emergency Shelter
Rapid Re-Housing
Homelessness Prevention

Adopted March 29, 2016

Revised July 21, 2020

Emergency Solutions Grant (ESG)

Reference 24 CFR Part 576.400 and 24 CFR Part 91.220

Emergency Solutions Grant Standards

The County of Riverside, through the Housing, Homelessness Prevention, and Workforce Solutions (HHPWS), is responsible for coordinating and implementing a system-wide approach to meet the needs of the population and subpopulation experiencing homelessness within the geographic area of Riverside County. The Emergency Solution Grant (ESG) regulations, the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), and the Continuum of Care (CoC) Program Interim Rules state that the CoC, in consultation with recipients of ESG program funds within the geographic area, must:

- (1) Establish and consistently follow written standards for providing CoC assistance;
- (2) Establish performance targets appropriate for population and program type; and
- (3) Monitor recipient and sub-recipient performance.

Pursuant to the Code of Federal Regulations 24 CFR Part 578, HHPWS has developed the following written standards. These standards will apply to all projects and activities that receive County ESG funding. These are intended as basic minimum standards to which subrecipients can make additions and/or enforce more stringent standards applicable to their own projects. In addition, all projects must comply with the Notice of Funding Availability (NOFA) under which the project was originally awarded and applicable HEARTH Act requirements. All programs that receive ESG funding are required to abide by these written standards.

Overview of Hearth Act:

- The Homeless Emergency and Rapid Transition to Housing Act, was approved on May 20, 2009, and amended the McKinney-Vento Homeless Assistance Act.
- Changes allow for increased flexibility in who may be served and what activities may be carried out.
- The HEARTH Act consolidates three of the separate homeless assistance programs administered by HUD under the McKinney-Vento Homeless Assistance Act into a single grant program and creates the Emergency Solutions Grant Program and the Rural Housing Stability Program.
- The focus changed from homeless shelter to homelessness prevention.

ESG and CoC Coordination/Collaboration

In collaboration with other ESG service providers, these written standards have been developed by ESG grantees within Riverside County, including HHPWS, the City of Riverside, City of Moreno Valley, and Continuum of Care (CoC) Membership. This collaboration allows for input on the standards and implementation process developed by organizations that directly provide homeless and housing services, Rapid Re-housing (R/R), and Homelessness Prevention (HP). The ESG Written Standards have been approved by the CoC, the County, and City ESG recipients. These written standards will be reviewed and revised at least annually, or as needed, to continue to build upon and refine this document.

Housing First Model

HUD encourages all ESG grantees and subrecipients as well as the COC to implement a “housing first” approach when providing assistance. The housing first approach prioritizes rapid placement and stabilization in permanent housing; it does not have service participation requirements or preconditions (such as sobriety or a minimum income threshold).

Transitional housing and supportive services only projects may also be considered when using the housing first approach, if they operate with low-barriers, work to quickly move people into permanent housing, do not require participation in supportive services, and do not require any preconditions for moving into transitional housing.

Universal Assessment

All individuals will be assessed using a comprehensive, universal assessment tool called the Vulnerability Index Service Prioritization Decision Assistance Tool (VI-SPDAT). This tool guarantees that an individual or family’s level of need and eligibility determination are made in an informed, reasonable, and objective manner.

Homeless Management Information System

All subrecipients are required to participate in the Homeless Management Information System (HMIS) per the ESG and CoC Interim Rule (24 CFR Part 576 and Part 578). HMIS provides an opportunity to document homelessness and helps to ensure coordination between service providers while avoiding duplication of services and client data.

Data Sharing Requirement

Data sharing is a multi-directional sharing relationship between multiple organizations. In order to systematically share data, the participating agencies must jointly establish a data sharing network formalized by the execution of guidelines, with the understanding they agree to future updates to the guidelines made by the HMIS Committee.

ESG Agreements

HHPWS enters into one or two-year agreements with ESG subrecipients. In general, these subrecipient agreements define:

- Key program components or activities (including benchmarks for success);
- The level of ESG funding;
- The anticipated source and amount of matching funds (24CFR Part 576.201) contributed by the agency/organization;
- Applicable laws and regulations; and
- Documentation or reporting requirements.

Expenditure Limits

Funds used for street outreach and emergency shelter activities will be limited to the greater of:

- 60 percent of the County of Riverside’s total current fiscal year (FY) grant for ESG; or

- the amount of FY 2010 ESG grant funds that were committed to street outreach and emergency shelter.

Matching Funds Requirements

- The recipient must make matching contributions to supplement the recipient’s ESG program in an amount that equals the amount of ESG funds provided by HUD.
- Matching contributions may be obtained from any eligible source, including any Federal source other than the ESG program, as well as state, local, and private sources. Additional requirements apply to matching contributions from a Federal source of funds.
- Matching contributions must be provided after the date that HUD signs the grant agreement.

Uniform Administrative Requirements

The use of ESG funding is subject to the applicable requirements of 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*. The purpose of 2 CFR Part 200 is to streamline the Federal Government’s guidance on administrative requirements to more effectively focus Federal resources on improving performance and outcomes, while ensuring the financial integrity of the Federal programs in partnership with non-federal stakeholders (e.g., grantees and sub-recipients). 2 CFR Part 200 supersedes, consolidates, and streamlines requirements from eight (8) OMB Circulars: A-21, A-87, A-89, A-102, A-110, A-122, A-133, and A-50. Subrecipients are required to maintain an acceptable general accounting system. A subrecipient’s general accounting system must include:

- Independent Single Audit: All ESG sub-recipients that expend more than \$750,000 of Federal funds (including all Federal sources) in a single year must have a single audit conducted in conformance with 2 CFR Part 200.514. Copies of the Single Audit must be sent to the County as well as HUD.
- All records must be maintained for a minimum of four (4) years.

Financial Management

Pursuant to 2 CFR Part 200, *Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards*, ESG Grantees and subrecipients must ensure compliance with regulations and requirements pertaining to the following key areas of financial management:

- | | |
|------------------------|--------------------------|
| • Usage of funds | • Required funding match |
| • Internal controls | • Budget controls |
| • Cash management | • Accounting controls |
| • Procurement Property | • Asset controls |
| • Audits | |

Documentation of Homelessness

ESG sub-recipients are required to maintain adequate documentation of homelessness status to determine eligibility of persons served by the ESG program.

- A copy of this documentation must be maintained by the subrecipient in the client’s or participant’s file. Documentation includes 3-day notice to pay or quit, public agency written verification of homelessness, or self-certification of homelessness are examples of required proof to require and maintain in client file.

Qualifications of Homelessness

A person is considered homeless only when he/she resides in one of the following places:

- In places not meant for human habitation such as a car, park, sidewalk, an abandon building, or on the street;
- In an emergency shelter;
- In transitional or supportive housing for homeless persons who originally came from the streets or emergency shelter; or
- In any of the above but is spending a short time (up to 30 consecutive days) in a hospital or other institution.

Monitoring and Site Visits

Monitoring can take a number of forms and can include review of progress reports, telephone consultation, and performance on-site assessments. The three basic goals for oversight and monitoring of the progress and performance of ESG grantees/recipients include:

- Ensure that ESG funds are used effectively to assist homeless individuals and families and that the basic ESG program goals are met;
- Ensure compliance with ESG regulations and program requirements in the usage of funds and in carrying out program activities; and
- Enhance and develop the management capacity of grantees or recipients.

Participation of Homeless Persons in Policy-Making and Operations

Pursuant to 24 CFR Part 576.405, recipients of ESG funds must provide for the participation of not less than one homeless or formerly homeless persons in a policy-making function within the subrecipient's organization. If the recipient is unable to meet this requirement, they must instead develop and implement a plan to consult with homeless or formerly homeless persons in a policy-making function regarding any facilities, services, or other assistance that received funding under ESG. All subrecipients of ESG funds are required to involve or encourage involvement of participants in the operation of an ESG-funded program or facility. ESG subrecipients will be required to provide documentation during HHPWS monitoring visits of their efforts to seek the participation of the homeless or formerly homeless.

Termination of Assistance (24 CFR Part 576.402):

The County and subrecipients may terminate assistance provided through ESG-funded activities to participants that violate program requirements. Written procedures must describe the specific program requirements and the termination, grievance, or appeal processes; this should include the procedures for a participant to request a hearing regarding the termination of their assistance. The federal regulation at 24 CFR Part 576.402 describes the termination provision:

(a) If a program participant violates program requirements, the recipient or subrecipient may terminate the assistance in accordance with a formal process established by the recipient or subrecipient that recognizes the rights of individuals affected. The recipient or subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases.

(b) Program participants receiving rental assistance or housing relocation and stabilization services. To terminate rental assistance or housing relocation and stabilization services to a program participant, the required formal process, at a minimum, must consist of:

- (1) Written notice to the program participant containing a clear statement of the reasons for termination;
- (2) A review of the decision, in which the program participant 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 program participant.

(c) Ability to provide further assistance. Termination under this section does not bar the recipient or subrecipient from providing further assistance at a later date to the same family or individual.

Reimbursement Responsibilities

Subrecipients will be responsible to submit reimbursement request, on a monthly basis, for eligible and reasonable expenditures. The following must be included in the request:

- request cover page and summary page
- cancelled checks, bank statements, electronic payment receipts, credit card receipt, etc.
- invoice, bill, contract, lease, etc. (*late charges are not eligible*)
- HMIS reporting

Final reimbursement request must be submitted no later than the date specified in the ESG subrecipient agreement.

Five ESG Program Components

The table below compares the two types of eligible ESG clients and which of the five ESG funding components each client group may receive:

Component	Those who are Homeless	Those who are at risk of Homelessness
1. Street Outreach	X	
2. Emergency Shelter	X	
3. Homelessness Prevention		X
4. Rapid Re-housing	X	
5. Homeless Management Information System (HMIS)	X	X

Standards for Programs Components

1. Street Outreach

Eligible Participants: “Unsheltered” individuals and families, meaning those who qualify under paragraph (1) (i) of the definition of “homeless.”

Eligible Activities: Essential services to eligible participants provided on the street or in parks, abandoned buildings, bus stations, campgrounds, and in other such settings where unsheltered persons are staying. Staff salaries related to carrying out street outreach activities is also eligible.

Eligible Costs:

Standards for targeting and providing essential services related to Street Outreach include:

- Engagement
Activities to locate, identify, and build relationships with unsheltered homeless people for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs.
- Case Management
Assessing housing need and arranging/coordinating/monitoring the delivery of individualized services.
- Emergency Health Services
Outpatient treatment for urgent medical conditions provided by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to eligible participants unwilling or unable to access emergency shelter or health care facility.
- Emergency Mental Health Services
Outpatient treatment for urgent mental health conditions provided by licensed professionals in community-based settings (e.g., streets, parks, and campgrounds).
- Transportation
Travel by outreach workers, social workers, medical professionals or other service providers during the provision of eligible street outreach services.
- Services to Special Populations
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.

2. Emergency Shelter

Eligible Participants are individuals and families who are homeless. ESG funds may be used to provide essential services to persons in emergency shelters, major renovation of an emergency shelter, conversion of a building into an emergency shelter, or shelter operating costs. Staff costs related to carrying out emergency shelter activities is also eligible.

Overview of eligible costs include:

- ♦ Essential Services
- ♦ Renovation
- ♦ Shelter Operations

A. Essential Services

Eligible costs to provide essential services to individuals and families who are in an emergency shelter are as follows:

- Case Management
- Life Skills Training
- Child Care
- Education Services
- Employment Assistance and Job Training
- Outpatient Health Services
- Legal Services
- Mental Health Services
- Substance Abuse Treatment Services
- Transportation
- Services for Special Populations

Note: Emergency Shelter agencies must include in their policies and procedures the process of admission, diversion, referral and discharge including standards regarding length of stay and safeguards to meet the safety and shelter needs of special populations and individuals, and families who have the highest barriers to housing and are likely to be homeless the longest.

B. Renovation and Conversion

Eligible costs include labor, materials, tools, and other costs for renovations. When ESG funds are used for renovations, other than major rehabilitation or conversion, the minimum period of use to be maintained as a shelter for homeless individuals and families is three (3) years. If the rehabilitation costs of an emergency shelter exceeds 75 percent of the value of the building before rehabilitation (major rehabilitation) or if the costs to convert a building into an emergency shelter exceeds seventy-five percent (75%) of the value of the building after the conversion, then the minimum period of use is 10 years. including soft costs, or conversion of a building to be used as an emergency shelter. The maximum funding allowed is **\$5,000**.

C. Shelter Operations

Eligible costs are the costs of maintenance necessary for the operation of an emergency shelter. In the case when no appropriate emergency shelter is available for a homeless family or individual, a hotel or motel voucher will also be considered eligible. Additional eligible shelter operation costs include the following:

- Maintenance (*including minor or routine repairs*)
- Food
- Insurance
- Rent
- Furnishings
- Security
- Supplies necessary for the operation of the emergency shelter
- Fuel, Utilities, or Equipment

3. **Rapid- Rehousing**

The purpose of Rapid Re-housing is to serve participants who meet the criteria under paragraph (1) of the “homeless” definition in 24 CFR Part 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition.

Sub-recipients must maintain standards to help homeless persons living on the streets or in an emergency shelter transition as quickly as possible into permanent housing, and then, to help such persons achieve stability in that housing.

Eligible participants are individuals and families literally homeless currently living in an emergency shelter or place not meant for human habitation. Eligible activities include the following services:

- Housing Relocation and Stabilization Services
- Short- and Medium-Term Rental Assistance

4. **Homelessness Prevention**

The purpose of Homelessness Prevention is to prevent persons from becoming homeless in a shelter or an unsheltered situation. Funding may also be used to help such persons regain stability in their current housing or other permanent housing. Eligibility for services applies to individuals and families who are *at imminent risk, or at risk, of homelessness*, meaning those who qualify under paragraph (2) and (3) of the homeless definition or those who qualify as at risk of homelessness. Individuals and families must have an income at, or below, 30% of median family income for the area (AMI). Eligible activities include the following:

- Housing Relocation and Stabilization Services
- Short- and Medium-Term Rental Assistance

Housing Relocation and Stabilization Services

The following guidelines apply to both Rapid-Rehousing and Homelessness Prevention.

FINANCIAL ASSISTANCE	SERVICES
Moving costs	Housing search & placement
Rent application fees	Housing Stability Case Management
Last month's rent	Mediation
Utility payments –up to 24 mos. of payments per program participant/including up to 6 mos. arrears per service	Credit repair
Security deposit –equal to no more than 2 months rent	Legal Services
Standard utility deposits	

Short- and Medium-Term Rental Assistance: Rapid Re-housing/Homelessness Prevention

Types of Rental Assistance

1. Short Term Rental Assistance
2. Medium Term Rental Assistance
3. Payment of Rental Arrears

Length of Assistance

- up to 3 Months
4 to 24 Months
One-time payment for up to 6 months of arrears including late fees.

Payment of Rental Assistance and Lease Requirements 24 CFR Part 576.106

Rent Restrictions: Pursuant to 24 CFR Part 576.106 (d), rental assistance cannot be provided unless the rent **does not exceed** the Fair Market Rent established by HUD, as provided under 24 CFR Part 888, and complies with HUD’s standard of rent reasonableness as established by 24 CFR Part 982.507.

Rental Assistance Agreement: ESG recipients and subrecipients **must** enter into Rental Assistance Agreements with the property owner prior to the payment of any rental assistance on behalf of a client. The agreements must comply with the provisions of 24 CFR Part 576.106 (e).

Leases: Pursuant to 25 CFR Part 576.106 (g), each program participant receiving ESG-funded rental assistance **must** have a legally binding written lease with the property owner for the rental unit unless the ESG assistance is for arrears. Rental assistance may be tenant-based or project-based. For tenant-based rental assistance, both the rental assistance agreement and lease **must** conform to the requirements found at 24 CFR Part 576.106 (h). For project-based rental assistance, both the rental assistance agreement and lease **must** conform to the requirements found at 24 CFR Part 576.106 (i). **NOTE: for project-based rental assistance, the initial lease must have a term of one year.**

A. Performance Standards

The ESG grantee must describe the performance standards for evaluating ESG activities which must be developed in consultation with the Continuum of Care.

Based on standards and goals of the local Continuum of Care, Riverside County is proposing the following performance standards for the Emergency Solutions Grant:

Performance Measures for Homelessness Prevention

- a. A reduction in the number of homeless individuals and families seeking emergency shelter services.
- b. Expected Outcome: At least thirty-five percent (35%) of participants assisted will remain in permanent housing six (6) months after the last assistance was provided under ESG.

Performance Measures for Homeless Rapid Re-Housing

- a. A reduction in the reoccurrence of homelessness for individuals and families who exit the shelter system.
- b. Expected Outcome: At least thirty-five percent (35%) of participants assisted will remain in permanent housing six (6) months after the last assistance provided under ESG.

B. EVALUATION OF ELIGIBILITY

Utilization of the Coordinated Entry System (HomeConnect) Requirement

Pursuant to 24CFR 576.400(10)(d) requires centralized or coordinated assessment requirement. The Continuum of Care has developed a coordinated assessment system in accordance with requirements established by HUD known as HomeConnect. ESG funded program or project within the Continuum of Care's area must use that assessment system. The recipient and subrecipient must work with the Continuum of Care to ensure the screening, assessment and referral of program participants are consistent with the written standards established and all policies and guidelines required by the Coordinated Entry System lead agency. As allowed by the ESG Interim rule, a victim service provider may choose not to use the Continuum of Care's centralized or coordinated assessment system. Refer to the Coordinated Entry System guide and lead agency for instructions.

Standard Policies and Procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG).

Building on Established HPRP Policies and Procedures

The policies and procedures were originally established based on the provisions of HPRP assistance. The policies and procedures have been modified based upon the checklist of required elements set forth in 24 CFR Part 576.400 (e)(1) and (e)(3); 24 CFR Part 91.220 (l)(4)(vi), and in collaboration with CoC standards.

Centralized Pre-Screening and Assessment Available at Multiple Locations

The County of Riverside Continuum of Care (CoC) conducts a Coordinated Intake and Assessment System piloted through the 25 Cities Project, a partnership with HUD and the U.S. Department of Housing and Urban Development (HUD) to eliminate homelessness among veterans by 2016 and chronic homelessness by 2020. The pilot in the Greater City of Riverside Area was implemented countywide during 2015.

Participating agencies are responsible for engaging chronically homeless individuals and families through the use of Housing Navigators and a standardized vulnerability assessment and intake process that provides referrals to a centralized housing system that places priority on those who are at highest risk with the most appropriate intervention rather than a "first come, first served" approach.

Individuals and families applying for ESG assistance must complete an eligibility pre-screening form. Pre-screening may be completed via phone, online, or at established locations, including

emergency shelter locations. Individuals and families who meet established pre-screening requirements will be scheduled an appointment with a case manager for assessment and eligibility documentation.

Basic Eligibility Requirements

- Initial Consultation & Eligibility Determination: The applicant(s) **must** receive at least an initial consultation and eligibility assessment with a case manager or other authorized representative who can determine eligibility and appropriate type of assistance.
- ESG clients must meet one of the following definitions of homelessness:
 1. Literally homeless
 2. At imminent risk of homelessness
 3. Homeless under Federal Statutes
 4. Fleeing/attempting to flee domestic violence
- Income: The household's total annual income must be below thirty percent (30%) of the median family income for the area (AMI)
- Housing Status: Case files must document the current housing status of the household at application. Housing status will be verified through third party verification whenever possible. Self-certification of housing status will be considered on a case by case basis.
- Riverside County Residency: All households receiving Homelessness Prevention or Rapid Re-housing assistance under ESG must be residents of Riverside County at time of application.
- Unidentifiable financial resources and/or support networks: In order to receive ESG rental financial assistance, applicants must also demonstrate the following:
 1. No appropriate subsequent housing options have been identified;
 2. The household lacks the financial resources to obtain immediate housing or remain in its existing housing; and
 3. The household lacks support networks needed to obtain immediate housing or remain in its existing housing.

C. POLICIES AND PROCEDURES FOR PROGRAM COORDINATION

Policies and Procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.

The ESG program requires coordination among participating agencies. All ESG subrecipients in Riverside County are experienced homeless providers with a demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households. Additionally, the project administration agreement with ESG subrecipients will require coordination among agencies receiving ESG funds to administer Emergency Shelter, essential services, Homelessness Prevention, Rapid Re-housing services, and related assistance, and access to mainstream services and housing providers for clients.

Participation in the Continuum of Care

ESG funded agencies have easy access to membership in the Continuum of Care. The Continuum of Care has over 100 member organizations including homeless service providers, veteran service representatives, churches, and government organizations. The Continuum of Care meets on a regular basis and shares information about services among participating agencies.

Required Client Information and Referrals

To further facilitate collaboration and information sharing, ESG funded agencies will be required to provide the following information and referrals to ESG program participants:

- 2-1-1 hotline for social services
- Social security benefits
- Cal-Works and other income security programs provided by the County of Riverside, Department of Public Social Services (DPSS)
- Cal-Fresh (formerly known as Food Stamps) assistance
- Low Income Energy Assistance Programs
- Affordable housing information
- Employment assistance and job training programs
- Health care and mental health services
- Services for victims of domestic violence
- Veteran services
- Specialized services such as legal services and credit counseling

D. POLICIES AND PROCEDURES FOR DETERMINING ASSISTANCE AND PRIORITIZATION

Policies and Procedures for determining and prioritizing which eligible families and individuals will receive Homelessness Prevention assistance and which eligible families and individuals that will receive Rapid Re-housing assistance.

Once it is determined that the household meets the basic eligibility guidelines noted above, the household will be assessed for the appropriate form(s), level, and duration of financial assistance. The results of this assessment will be formalized in a Housing/Financial Assistance Plan that is signed by both the applicant and the case manager.

Assistance through Homelessness Prevention

Homelessness Prevention assistance will be targeted to households who are at risk of losing their present housing and becoming homeless. While there are many people who are housed and have a great need for rental assistance, not everyone will become homeless without assistance. A risk assessment will be used to assess the household's level of crisis and prioritize those who are at greatest risk of becoming homeless. The assessment tool will include vulnerability criteria including but not limited to; income, housing history, food security, childcare, health care, life skills, and other special needs. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the applicant meets the eligibility and risk assessment criteria.*

Assistance through Re-housing

Homeless Rapid Re-housing assistance is intended for individuals or families who meet the homeless definition described in 42 USC 11302 of the McKinney Vento Homeless Assistance Act, as amended by the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009.

While there are many homeless individuals and families in Riverside County at any given night, the Rapid Re-housing assistance will be prioritized for households who are residing in emergency shelters and on the streets. Due to the limited amount of funding, assistance will be provided on a first come, first served basis, if the applicant meets the eligibility and risk assessment criteria. *

*** Rapid Re-housing should prioritize people with more challenges, including those with no income, poor employment prospects, troubled rental histories, and criminal records. Providers should link participants with community resources that will help them achieve longer-term stability and well-being.**

E. DETERMINING SHARE OF RENT AND UTILITY COSTS

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving Homelessness Prevention or Rapid Re-housing assistance.

Limitations on Assistance – Homelessness Prevention

Riverside County's ESG rental assistance is intended to stabilize individuals and families who have recently endured difficult financial circumstances that have led them into homelessness or who are at imminent risk of becoming homeless. For Homelessness Prevention assistance, the rental assistance consists of short term rental assistance (3 months); extended under certain circumstances to medium term rental assistance (for an additional 3 months). The total maximum length of assistance is twelve months (12) over a 3-year period. Client **must** be reassessed after every 90 day period and provided case management services on a monthly basis.

Not every individual or family in need of rental assistance is a candidate for ESG Homelessness Prevention or Rapid Re-housing assistance. ESG rental assistance is not a substitute for Section 8 rental assistance or a permanent rental subsidy, but rather a tool to help stabilize families or individuals who are at imminent risk of becoming homeless and lack any other resources to help them stabilize their housing situation. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (24 CFR Part 576.106).

As a general rule, an individual or household should pay approximately 30% of their income towards rent. This requirement may be waived on a case-by-case basis for extreme circumstances. The ESG assistance will consist of the remaining portion of the rent, up to \$1,000 (excluding the clients' contribution towards the rent).

Clients are required to be reassessed at regular monthly intervals to monitor progress and levels of self-sufficiency. If a client requires assistance beyond the three month mark, the ESG rental subsidy will be reduced and the client will be required to pay a larger portion of the rent. Homelessness Prevention assistance will be based on number in household, fair market rent rate, and income to determine for a maximum one year over a 3 -year period.

Limitations on Assistance – Rapid Re-housing

Under Rapid Re-housing assistance, a client's share of rent should be based on the client's ability to pay during their path to housing stabilization, with a minimum \$25.00 client contribution. This requirement may be waived on a case-by-case basis for extreme circumstances. Clients receiving Rapid Re-housing assistance must be re-assessed, at a minimum every 90 days, and reviewed during monthly case management. The maximum length of Rapid Re-housing assistance will be one (1) year during any 3-year period. The assistance should not exceed the Fair Market Rent amount based on client household, except for the first month of assistance if client requires assistance with other re-housing expenses such as rent deposits or utility deposits. Security deposit should not exceed two times the rent.

Standards for determining the share of rent and utilities costs that each program participant must pay, if any, will be based on the following guidelines:

- 100% of the cost of rent in rental assistance may be provided to program participants. However to maximize the number of households that can be served with Rapid Re-housing resources, it is expected that the level of need will be based on the goal of providing only what is necessary for each household to be stably housed for the long term;
- Rental assistance cannot be provided for a unit unless the rent for that unit is at or below the Fair Market Rent limit, established by HUD;
- The rent charged for a unit must be reasonable in relation to rents currently being charged for comparable units in the private unassisted market and must not be in excess of rents currently being charged by the owner for comparable unassisted units.

Note: Grant funds may be used for rental assistance for homeless individuals and families. Rental assistance cannot be provided to a program participant who is already receiving rental assistance, or living in a housing unit receiving rental assistance or operating assistance through other federal, State, or local sources (24 CFR Part 576.106).

Limitations on Assistance – All Clients

Due to the limited amount of funds available, the ESG assistance will not exceed Fair Market Rent per client per month in combined ESG assistance, including rent and utility payments.* Generally, clients should be responsible for paying their own utility costs while receiving ESG rental assistance, unless they are experiencing acute financial hardship or are at risk of losing their housing due to utility shut off. Clients seeking help with utilities only may be eligible for ESG assistance if it can be documented that they will lose their housing and become literally homeless if utility assistance is not provided; however, the household still must meet other ESG eligibility requirements.

F. DETERMINING LENGTH AND ONGOING NEED FOR RENTAL ASSISTANCE

Standards for determining how long a particular participant will be provided with rental assistance and whether the amount of that assistance will be adjusted over time.

ESG assistance consists of short term (up to 3 months), medium term (up to 6 months), and maximum term (up to 1 year) rental assistance to allow individuals or families who have recently encountered a financial crisis that has led them into homelessness or at imminent risk of homelessness, to gain housing stabilization. Since the program consists of temporary assistance aiming at rapid stabilization of households, clients are required to contribute a portion of their income towards rent. Clients with no potential to earn income may not be suitable candidates for this type of assistance, unless other subsidies can be accessed after the ESG assistance expires.

Clients assisted under ESG Homelessness Prevention Assistance are eligible to receive the rental assistance for up to 3 months if they meet income eligibility of less than 30% of median family income for the area (AMI) during the 3 month period and comply with the case management requirements of the program. At the end of the third month, clients must be re-assessed to determine if the client's rental assistance needs to be extended for an additional 3-month period. If the ESG rental assistance is extended for an additional three (3) months, the ESG assistance will be reduced and/or adjusted over the remaining time.

Clients assisted under ESG Rapid Re-housing Assistance are eligible to receive rental and utility assistance for up to one-year if they meet income eligibility during the one-year period. Rapid Re-housing clients **must** receive monthly case management, be evaluated at regular intervals, and be re-assessed every 90-days during the ESG assistance period. The ESG rental assistance should be reduced gradually and the client's portion of rent increased during the months of assistance.

G. DETERMINING NEED FOR HOUSING STABILIZATION AND RELOCATION SERVICES

Standards for determining the type, amount, and duration of housing stabilization and /or relocation services to provide a program participant, including the limits, if any, on Homelessness Prevention or Rapid Re-housing assistance that each program participant may receive, such as the maximum amount of assistance; maximum number of months the program participant receives assistance; or the maximum number of times the program participant may receive assistance.

Reasonableness Determination

HHPWS will set the maximum amount of assistance to be provided to Homelessness Prevention and Rapid Re-housing clients on an annual basis. HHPWS will also determine if the total benefit amount to be awarded to any one client is both reasonable and necessary.

Reporting – Centralized/Coordinated Assessment System

- The HEARTH Act makes HMIS participation a statutory requirement for ESG recipients and sub-recipients. HHPWS and the subrecipients work with the Continuum of Care to ensure the screening, assessment, and referral of program participants are consistent with the written standards.
- The recipient will ensure that data on all persons served and all activities assisted under ESG are entered into a community-wide HMIS in the area in which those persons and activities are located.
- Victim service providers cannot, and Legal Services Organizations may choose to not participate in HMIS. Providers that do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports instead.
- Eligible Cost include, but not limited to the following:
 - Hardware, Equipment and Software Costs
 - Staffing: Paying salaries for operating HMIS

- Training and Overhead- Technical support, leasing space, and utilities for space used by HMIS staff

Comparable Database for Victim Services

If the sub-recipient is a victim services or a legal services provider that use a comparable database, it may use ESG funds to establish and operate a comparable database that collects client-level data over time 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.

Case Management

HHPWS has defined case management as a “collaborative” process that assesses, plans, implements, coordinates, monitors, and evaluates the options and services required to meet the client’s health and human service needs. It is characterized by advocacy, communication, and resource management and promotes quality and cost-effective interventions and outcomes. Case management focuses on housing stability and placement, with an emphasis on the arrangement, coordination, monitoring, and delivery of services related to housing needs and improving housing stability.

A meeting with a case manager is required in order to receive Rapid Re-housing assistance, although it is not necessarily the first step. Some communities might have a screening, intake, assessment, or other eligibility determination process that precedes the assignment to a case manager while other communities may have case managers performing the eligibility task. Regardless of the arrangement, the meeting with the case manager should be regarded not only as a program requirement, but also as an early opportunity to help a household improve its housing stability during and beyond the period of Rapid Re-housing assistance.

Transitional Housing and Rapid Re-housing

While transitional housing is technically eligible, HUD cautions recipients against using ESG Rapid Re-housing funds as a way of regularly exiting a person from transitional housing to permanent housing. It is recommended that Rapid Re-housing be used as a model for helping people move from the streets or shelter to permanent housing, not for people exiting transitional housing.

Additionally, transitional housing providers should have programs designed to successfully exit people and should not use Rapid Re-housing, another form of temporary assistance, as a regular part their program design. HUD recommends this be done on a case-by-case basis, so that it is not common practice, but is provided only when necessary to prevent the program participant from going back to the streets or emergency shelter. HHPWS established standards and determined transitional housing is not an effective use of funding and will not be utilized to house clients residing in transitional housing or transition to permanent housing.

NOTE: program participants would need to be assessed for and determined to be eligible for ESG Rapid Re-housing assistance, in accordance with the ESG eligibility and documentation requirements. (Homeless definition in 24 CFR Part 576.2) 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 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.

Consultation Process

HHPWS and the ESG subrecipients will continuously consult with the Continuum of Care to discuss the County's ESG allocation in ways that:

- Coordinate across regional entitlement jurisdictions by developing and utilizing standardized eligibility and assessment tools;
- Support federal and local goals for priority populations;
- Allow for variations in the program design that responds to the needs and resources of the jurisdiction
- Comply with eligibility and verification requirements (HMIS, housing status, homeless definitions, etc.)

The ESG program requires coordination among participating agencies. All ESG subrecipients in Riverside County are experienced homeless providers with a demonstrated track record in fiscal management and the provision of housing and supportive services targeted to homeless households. ESG funded agencies have easy access to membership in the Continuum of Care. The Continuum of Care has over 100 member organizations including homeless service providers, veteran service representatives, churches and government organizations. The Continuum of Care meets on a regular basis and shares information about services among participating agencies.

HHPWS also consulted with the Continuum of Care on the Ten Year Plan to End Homelessness to ensure the alignment of proposed ESG activities as they relate to the goals and strategies outlined in the plan. This joint effort has worked successfully in the past and HHPWS will continue to work closely with DPSS who serves as the lead agency and grantee for the County's Continuum of Care (CoC) program.

ESG Homeless Definitions

Refer to reference information located at the following:

https://www.hudexchange.info/resources/documents/HEARTH_HomelessDefinition_FinalRule.pdf