Welcome

Opening remarks

Matthew LaMantia,

Director, Community Planning and Development

HUD Field Offices in Ohio

Thomas H. Leach

Field Office Director

Columbus Field Office

Pamela E. Ashby

Field Office Director

Cleveland Field Office

Continuum of Care - 24 CFR 578
Emergency Solutions Grant - 24 CFR 576
Common Findings

Anthony Forte – Program Manager

HEARTH Act:
Continuum of Care Program - 24 CFR 578

FINDING	Standard Operating Procedures/ Written Policies & Procedures /Recordkeeping	CONDITION: Grantee did not establish detailed, grantee-specific standard operating procedures; grantee and/or client files did not have adequate source documentation. CRITERIA: 24 CFR 578.103(a)(1-18)
FINDING	Eligibility of Homeless Status: literal, at-risk, chronically homeless (dedicated)	CONDITION: Absence, inadequate, incomplete documentation, due diligence CRITERIA: 24 CFR 578.103 (a)(3): 576.500 (b); 578.103 (4); 578.103 (a)(5) & 576.500(c)
FINDING	Environmental Review Record	CONDITION: Failure to properly conduct & document compliant reviews (RE) CRITERIA: 24 CFR 578.99(a), 24 CFR 578.103(a)(16)

FINDING	Housing Quality Standards Inspections	CONDITION: Failure to conduct & document impartial & passed unit inspections, payments CRITERIA: 24 CFR 578.75 (b)(2), 578.103 (a)(9), 24 CFR 982.401, 24 CFR 578.95(c)
FINDING	Rent Reasonableness Review evaluations	CONDITION: Failure to conduct, document and evaluate RRR; rent exceeds CRITERIA: 24 CFR 578.51(g); 24 CFR 578.49(b); 24 CFR 578.103 (a)(17).
FINDING	Conflicts of Interest (organizational: CES, RRR & HQS)	CONDITION: Failure to recuse, mitigate, avoid or remedy programmatic conflicts CRITERIA: 24 CFR 578.95 (a-d), 2 CFR 200.317-318

General COC Program Operations Findings

Housing First:
24 CFR 578.21(a); Notice of Funding Availability (multiple years)

Annual Assessments:
24 CFR 578.37(a)(1)(ii)(E), 24 CFR 578.103 (a)(10)

Homeless Board Member/Decision Making:
24 CFR 578.75(g)(1); 24 CFR 578.75(g)(2)

Termination of Assistance:
24 CFR 578.91

FFATA:
24 CFR 578.99(c).

CES:
24 CFR 578.23 (c)(9), 24 CFR 578.37(a)(1)(ii)(A), 24 CFR 578.103(a)(17)

eLOCCS draws:
24 CFR 578.85(c)(3); 24 CFR 578.103(a)

Disability Diagnosis:
24 CFR 578.103(a)(17) and 24 CFR 578.37(a)(1).

Annual Performance Reports:
2 CFR 200.328 (b)(1); 24 CFR 578.103(e)

Leases:
24 CFR 578.51(I)(1)

Emergency Solutions Grant Program

24 CFR 576

FINDING	Standard Operating Procedures/ Written Policies & Procedures /Recordkeeping	CONDITION: Grantee did not establish detailed, grantee-specific standard operating procedures; grantee and/or client files did not have adequate source documentation. Written standards for providing ESG assistance. Failure to create and adopt SOP/P&P by the grantee &/or sub-grantee. CRITERIA: 24 CFR 576.500 (a)(b)(h), 576.400(e), 576.106 (g)
FINDING	Eligibility of Homeless Status: literal, at-risk, domestic violence	CONDITION: Absence, inadequate, incomplete documentation, due diligence CRITERIA: 24 CFR 576.2 definitions; 576.500 (b); & 576.500 (c)
FINDING	Habitability Standards and Inspections (differ from HQS) fire standards	CONDITION: Failure to conduct & document impartial & passed unit inspections, CRITERIA: 24 CFR 576.403 (c)(10)

FINDING	Fair Market Rents/Rent Reasonableness Review	CONDITION: Failure to conduct, document and evaluate RRR & FMR, proper rent CRITERIA: 24 CFR 576.106 (d)(1,2); 24 CFR Part 888 & 24 CFR 962.50
FINDING	Sub-recipient management & monitoring	CONDITION: Failure assess and monitor sub-recipient, document & exercise control over CRITERIA: 24 CFR 576.407; 2 CFR 200.329
FINDING	Termination of Assistance standards/due process and documentation	CONDITION: Failure to have policy, provide due process & maintain documentation CRITERIA: 24 CFR 576.402; 24 CFR 576.500 (f)(3)

ENVIRONMENTAL REVIEW

JORDAN FRASE, COMMUNITY PLANNING & DEVELOPMENT REPRESENTATIVE AND PROGRAM ENVIRONMENTAL SPECIALIST

CoC Coordination Completing Environmental Reviews

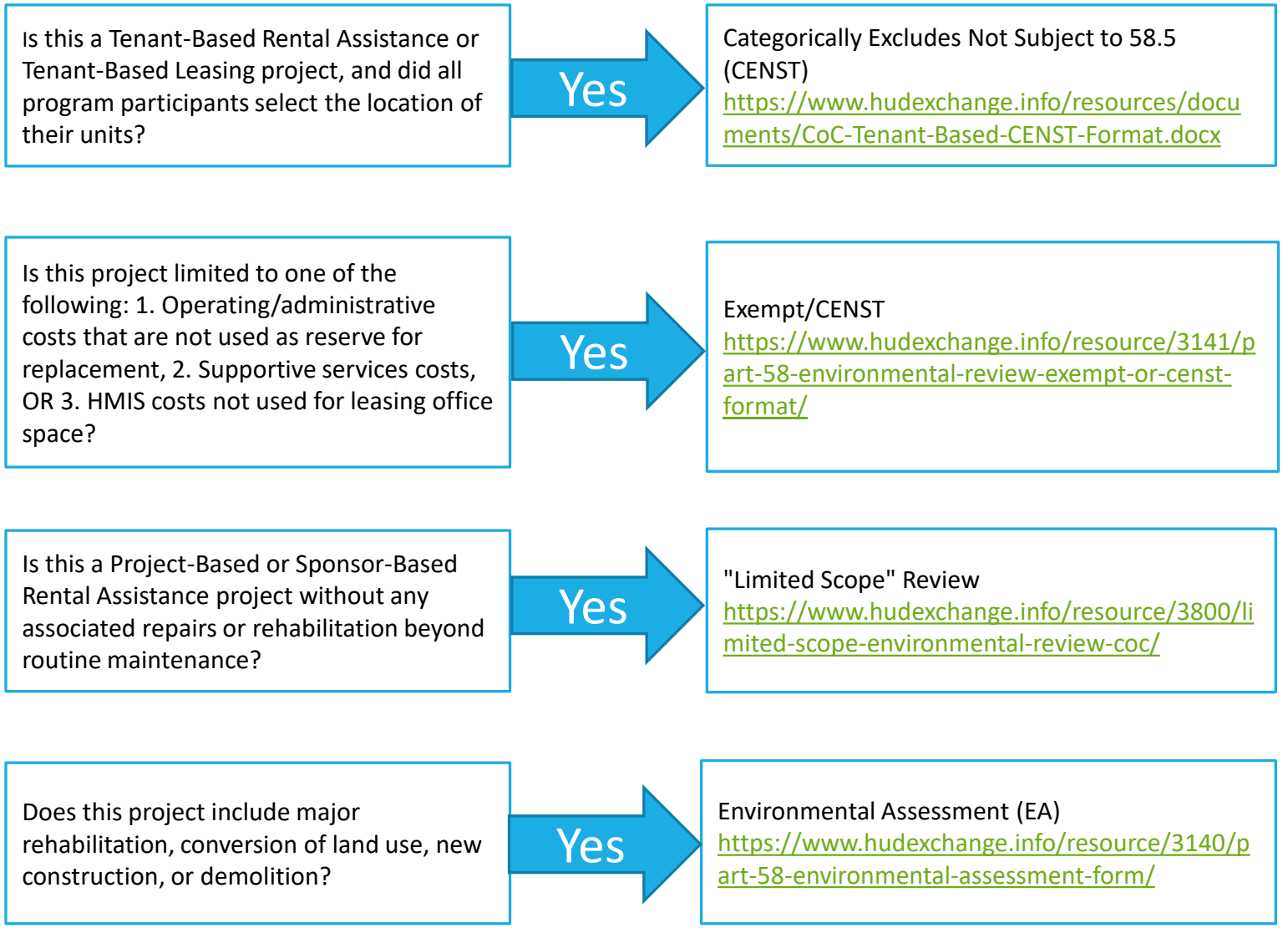
Environmental Review Compliance has been a common finding or area of concern among our eight (8) Continuum's of Care and the Balance of State Continuum of Care.

All projects MUST have an environmental review record on file prior to grant agreement execution and the commitment of funds, or risk noncompliance and potential repayment of funds.

Levels of Review:

Q: What level of review and which format should be used to complete environmental reviews for Continuum of Care (CoC) Program projects?

A: These reviews are valid for five years but should be updated annually with new grant numbers and any possible changes in project scope.



Who Completes and Authorizes the Environmental Review as Responsible Entity?

Grant Activity	Responsible Entity
For Tenant-Based Rental Assistance (TBRA) or Tenant-Based Leasing (TBL) where the program participants have complete autonomy in selecting their units	HUD
Soft Costs (Admin, HMIS, Operating Costs, Supportive Services)	HUD
Project-Based or Sponsor-Based Rental Assistance without any associated repairs or rehabilitation beyond routine maintenance	City/County or nearest Unit of Local Government

- HUD has completed Environmental Reviews for all FY19 and FY20 TBRA/TBL and Soft Costs grants. We will provide and these Environmental Review Records (ERR)'s should be maintained in project files.

Responsible Entities

Regulations at 24 CFR Part 58 authorize units of general local government to conduct environmental reviews for projects funded with HUD money. Local governments performing environmental review responsibilities under Part 58 are known as Responsible Entities (RE). CoC grantees are required to coordinate with their Responsibility Entity to complete limited-scoped ERR's for Project-Based and Sponsor-Based assistance grants.

Balance of State CoC does not have to defer to an entitlement jurisdiction to perform the environmental review. Any unit of government may act as the Responsible Entity (RE) to complete the environmental review.

We are asking our CoC grantees to please coordinate with a Responsible Entity in completion of these ERR's to quickly deploy funds in and around your communities.

Limited Scope Environmental Review

- Very quick process – HUD has completed most of the review, and it likely will not require an on-site visit.
- These ERR's should be based on the building and the surrounding geography, and not on the actual unit.
- Anyone can prepare the review (such as the CoC grantee), but a Responsible Entity (RE) must authorize.

Resources

- CoC Part 58 Flow Chart:
  https://files.hudexchange.info/resources/documents/Part-58-Flowchart.pdf

- CoC Limited Scope Format Template:
  https://www.hud.gov/sites/dfiles/CPD/documents/Limited-Scope-Environmental-Review-Format-CoC.pdf

- Jordan Frase, CPD Representative, Program Environmental Specialist – Jordan.C.Frase@hud.gov

COVID-19 Waivers

REGULATORY WAIVERS FOR CONTINUUM OF CARE PROGRAMS

Background

On April 1, 2020, HUD issued the first memorandum providing regulatory waivers for certain requirements associated with the Continuum of Care (CoC) Program.

Since then, HUD has issued 5 additional memorandums to extend and/or include additional program waivers.

The waivers are intended to help prevent the spread of COVID-19 and **to provide additional supports to individuals and families** eligible for assistance **who are economically impacted by COVID-19**.

Submitting and Documenting Waivers

Recipients wishing to utilize any of the waivers provided should notify their local CPD Director, by email, of their intent to utilize a specific waiver two days before they anticipate using the flexibility.

Matthew LaMantia, CPD Director

CPD_COVID19WaiverCOL@hud.gov

Must include:

Requestor's name, title, and contact information;

Date on which the grantee anticipates first use of the waiver flexibility; and

A list of the waiver flexibilities the grantee will use:

Submitting and Documenting Waivers

Remember! Recipient **must have** established a set of emergency policies and procedures for use during the COVID situation **or** update policies and procedures to come back into compliance with regulatory requirements now that social distancing measures are lifting. These policies should outline the waivers they are utilizing and describe the records they will maintain to support those waivers.

Waiver expiration

The continued use of CoC program waivers is not automatic, recipients **must** notify the FO if they are electing to utilize waivers throughout the extended time frames.

The FO is not privy to information regarding a 7th mega waiver or future waivers that would extend any current expiration dates. Recipients that are choosing to utilize waivers must be aware of when they expire and ensure full compliance the regulatory requirements as they expire.

Note: Mega waiver 6 establishes an expiration date of September 30, 2021, for waivers previously authorized until public health officials determine no additional special measure are necessary to prevent the spread of COVID-19.

HQS- Initial Inspection of unit

This waiver of the requirement in 24 CFR 578.75(b)(1) that the recipient or subrecipient **physically inspect each unit** to assure that the unit meets HQS before providing assistance on behalf of a program participant is in effect until **September 30, 2021** for recipients and subrecipients that are able to meet the following criteria:

- The owner certifies that they have no reasonable basis to have knowledge that life-threatening conditions exist in the unit or units in question; **and**
- The recipient or subrecipient has written policies to physically inspect the units not previously physically inspected by December 31, 2021.

Resources and Questions

HUD.GOV WAIVERS COVID-19 GRANTEE GUIDANCE PAGE:

CPD COVID-19 Waivers | HUD.gov / U.S. Department of Housing and Urban Development (HUD)
signed-2021-MegaWaiver-6_Final.pdf (hud.gov)

Roman Seaburgh
- Roman.a.seaburgh@hud.gov

CE Process Review and New Opportunities

OHIO ALL-GRANTEE MEETING

SEPTEMBER 30, 2021

Introductions

Jonathan Cox

Meghan Takashima

Grounding our Work in Equity

Review who comprises your planning body

Develop clear objectives related to prioritization and housing placement that further racial equity goals.

Use the CE evaluation process to identify discriminatory practices

Develop and collect a standardized set of data that can be used to understand racial disparities and inequities within the homelessness system.

Establish goals, benchmarks, and structure for accountability

Data must be collected, analyzed, and packaged in a way that policy-makers and leadership can use to drive decision-making and system changes

https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-Advancing-Racial-Equity-through-Assessments-and-Prioritization.pdf

CES Review

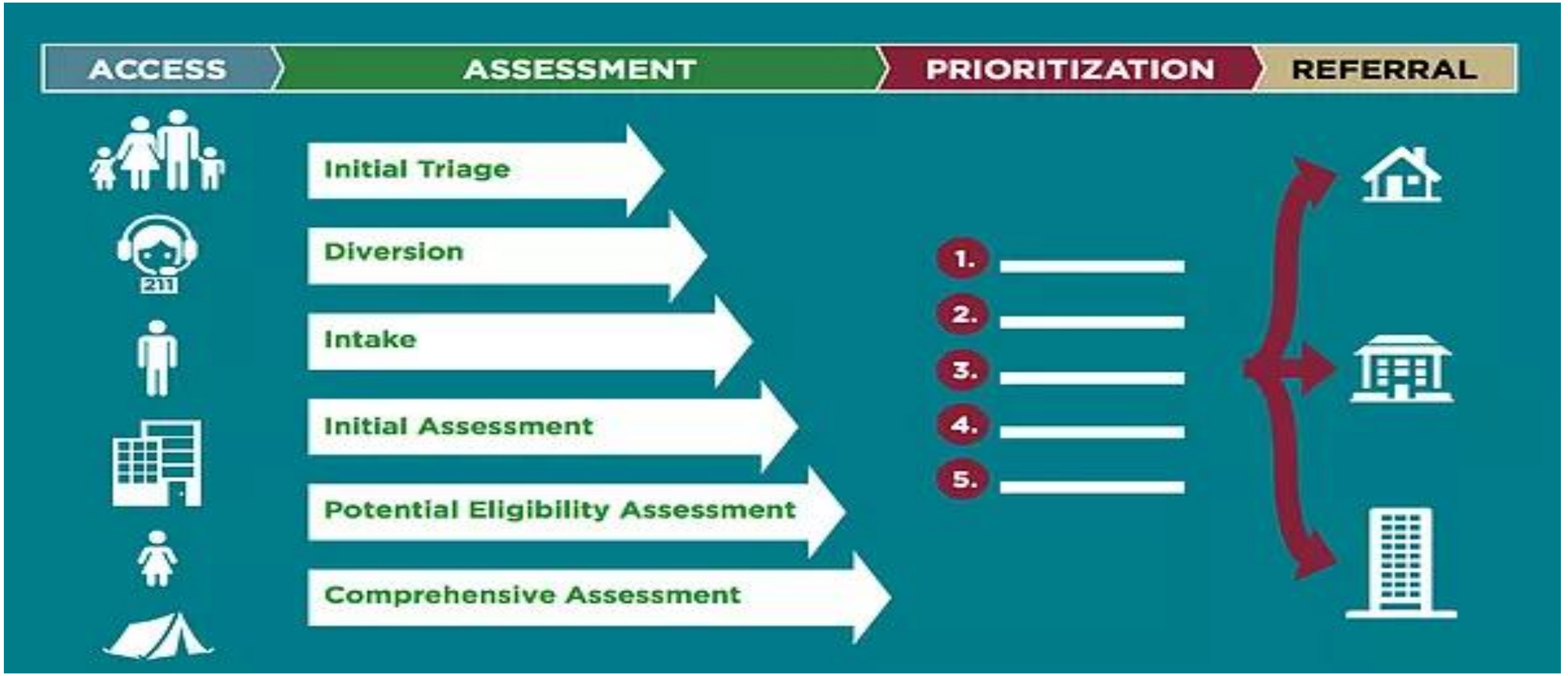
THE BASICS

Effective CE systems help CoCs:

- Reorient housing and service provision to be focused on the needs of the people it serves, creating a more client-focused environment;
- Minimize the time and frustration people spend trying to find assistance
- Maximize the use of available system resources, including mainstream resources, to meet their needs
- Identify and quantify housing and service gaps and any areas that have excess capacity

Before CE

After CE


ACCESS
ASSESSMENT
PRIORITIZATION
REFERRAL
211
Initial Triage
Diversion
Intake
Initial Assessment
Potential Eligibility Assessment
Comprehensive Assessment
1.
2.
3.
4.
5.

Key Elements of a CE System

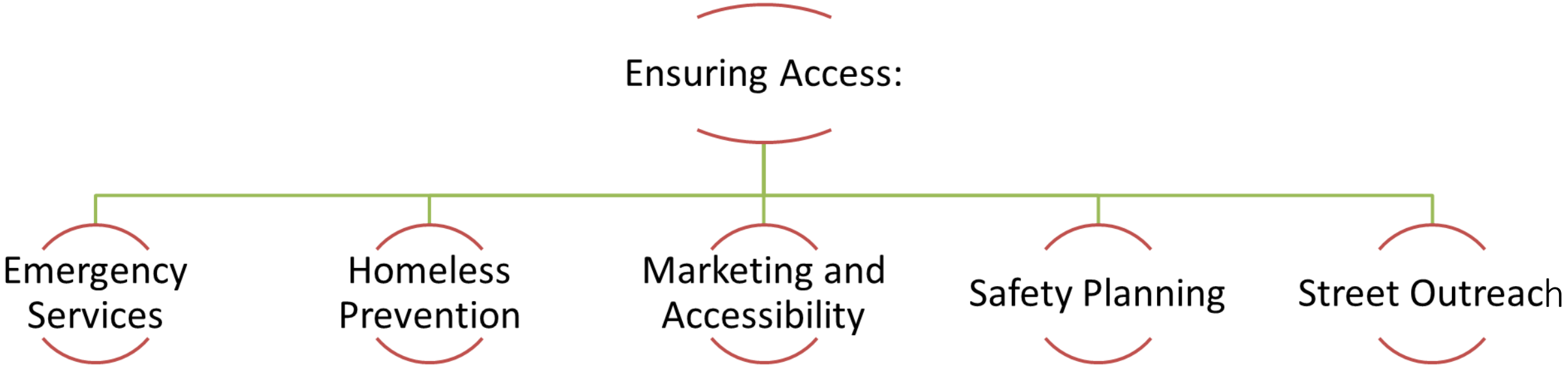
Access

Assess

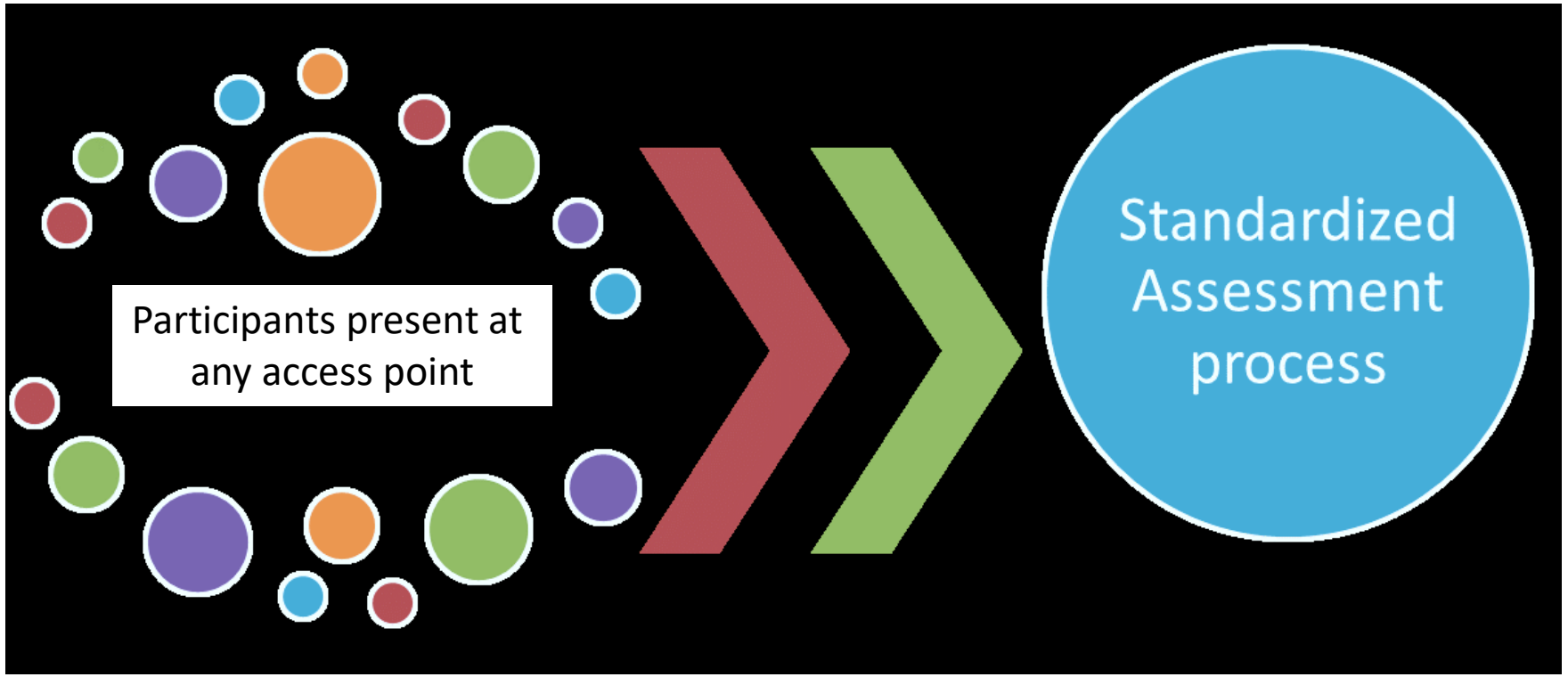
Prioritization

Referral

Access


Ensuring Access:
Emergency Services
Homeless Prevention
Marketing and Accessibility
Safety Planning
Street Outreach

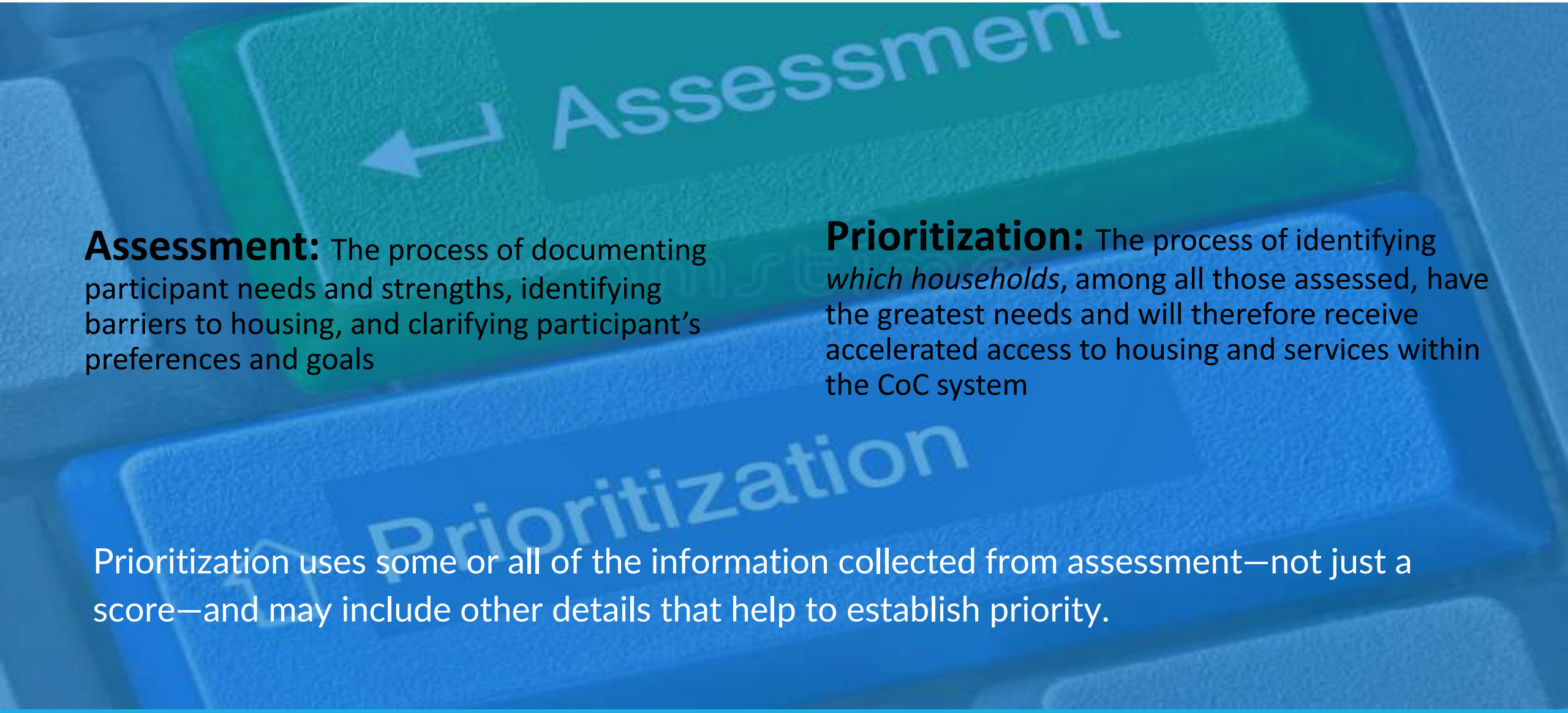
Assessment


Participants present at any access point
Standardized Assessment process

Prioritization

The process of assigning level of need or vulnerability to persons seeking assistance so that housing and services can be allocated to those persons with the greatest need.

Assessment vs. Prioritization



Assessment: The process of documenting participant needs and strengths, identifying barriers to housing, and clarifying participant's preferences and goals

Prioritization: The process of identifying *which households*, among all those assessed, have the greatest needs and will therefore receive accelerated access to housing and services within the CoC system

Prioritization uses some or all of the information collected from assessment—not just a score—and may include other details that help to establish priority.

Referrals

The coordinated entry process makes referrals to all projects receiving Emergency Solutions Grants (ESG) and CoC Program funds, including emergency shelter, RRH, PSH, and transitional housing (TH), as well as other housing and homelessness projects. Projects in the community that are dedicated to serving people experiencing homelessness fill all vacancies through referrals

Referral protocols. Programs that participate in the CoC's coordinated entry process accept all eligible referrals unless the CoC has a documented protocol for rejecting referrals that ensures that such rejections are justified and rare and that participants are able to identify and access another suitable project

- Source: https://files.hudexchange.info/resources/documents/Coordinated-Entry-Policy-Brief.pdf

CES System Review and Tune-Up

EVOLVING TO ADDRESS CHANGING TIMES

CE and Client Eligibility

The coordinated entry process may initiate the collection of required eligibility documentation—but it is not required to, nor is the coordinated entry process responsible for determining project eligibility or maintaining eligibility documentation after a referral has been made.

The focus of the assessment process in coordinated entry is the matching of persons to housing they are likely to qualify for, rather than predetermining their eligibility.

Individual CoC projects have ultimate responsibility for determining the eligibility of prospective participants in their programs and for collecting and maintaining eligibility documentation.

The coordinated entry process is often well positioned to screen preliminarily for presumptive eligibility.

https://files.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf

Question

How is HMIS being used to support eligibility determinations?

Policies and Procedures

The CoC must establish policies and procedures governing the operation of coordinated entry and ensure that those policies and procedures align with CoC Program and ESG Program written standards for the administration of CoC and ESG Program-funded projects.

Understanding Your CE System

Considerations:

- CE System improvements require understanding current function and dynamic response to system changes/housing availability
- With the current influx of resources to support permanent housing, particularly RRH and EHV, refinements are essential to ensure efficiency
- Referral processes should be based on available resources
- Special attention should be paid to address identified system performance or disparities across populations

Data Necessary to Ensure Efficiency

- Inventory
- Availability projections
- Program specific qualifications
- Client preferences
- Success of housing placements

Tune-Up Considerations

Access

- How have your access processes changed to reduce barriers and ensure health and safety for individuals and staff?
- How are you marketing and integrating new services into your CE system?
- How have programs for at-risk populations been integrated into CE?

Tune-Up Considerations

Assess

- **Adapt to Changing Needs:** Must update, modify or establish new assessment tools and processes to account for changes to prioritization and referral
- **Promote Efficiency:** In a crisis, assessment should rapidly capture information needed to prioritize
- **Collect Necessary Information:** Assessment should collect information to support appropriate matching and referral processes

Tune-Up Considerations

Prioritize

Based on evolving resource availability, determine:

- What subpopulations that will be prioritized for assistance, and what prioritization factors and/or partnerships will be used to identify households for referral;
- How people fleeing DV will be prioritized and referred for assistance;
- Housing services and assistance to be offered by the receiving programs

Tune-Up Considerations

Refer

- Focused strategies to expedite referrals:
  - System Navigation
  - Landlord Engagement and Retention Strategies

- Lower system-wide barriers to housing such as documentation requirements (use HUD waivers)
- Use inventory knowledge to adopt real-time system of monitoring unit availability/turnover monitoring
- Use inventory knowledge to develop prioritized pools of clients right-sized to available resources (center housing navigation efforts on these clients)

Using Data to Improve CE Processes

What information does you CE system collect that helps drive system improvements?

What challenges have you experienced in trying to project PH inventory?

What observations have you made about racial disparities in BIPOC representation in the system or outcomes?

Impact of the CARES Act on CES

$3.96 billion

CES – A Scarcity Model

SCARCITY, ALSO KNOWN AS PAUCITY, IS AN ECONOMICS TERM USED TO REFER TO A GAP BETWEEN AVAILABILITY OF LIMITED RESOURCES AND THE THEORETICAL NEEDS OF PEOPLE FOR SUCH RESOURCES. AS A RESULT, ENTITIES ARE FORCED TO DECIDE HOW BEST TO ALLOCATE A SCARCE RESOURCE IN AN EFFICIENT MANNER SO THAT MOST OF THE NEEDS AND WANTS CAN BE MET.

SOURCE: HTTPS://CORPORATEFINANCEINSTITUTE.COM/RESOURCES/KNOWLEDGE/ECONOMICS/SCARCITY/

How Have Things Changed?

- We have a unique opportunity to retool our system to assist more individuals and families than every before
- We have many waivers that allow flexibility to run programs with less administration and burden
- We have funding to build capacity, including increasing staff, hiring consultants, purchasing training and TA
- We don’t need to compete to secure funding

CARES Act Impact on CES

Coordinated Entry Project Refers…	ESG Program Funding Prior to Notice	ESG Program Funding With the Notice
…all clients to ESG-funded projects	ESG may fund up to 100% of the cost of the CE project.	
…clients to a mix of ESG- and non-ESG-funded projects	ESG may fund a prorated amount of CE costs based on the percentage of clients entered into ESG-funded projects.	ESG may fund up to 100% of the cost of the CE project, with documentation that shows the use of ESG-CV funds is limited to the increase in system costs due to COVID-19.
…all clients to non-ESG funded projects	ESG funds may not be used to fund the cost of the CE project.	

https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-Carrying-Out-Coordinated-Entry-Activities-Under-the-ESG-Program.pdf

Questions?

Coordinated Entry Resources

All HUD COVID-19 Related CE Resources (including EHV resources)

https://disaster-response-rehousing.info/ces/

Coordinated Entry Core Elements

https://files.hudexchange.info/resources/documents/Coordinated-Entry-Core-Elements.pdf

Coordinated Entry Policy Brief

https://files.hudexchange.info/resources/documents/Coordinated-Entry-Policy-Brief.pdf

Resource Libraries

https://endhomelessness.org/resource/coordinated-entry-community-samples-resource-library/

https://www.hudexchange.info/programs/coc/toolkit/responsibilities-and-duties/coordinated-entry-samples-toolkit/#access

CoC Funding

&

Coordination with Other Programs

Crosscutting CoC and ESG Eligibility Criteria

ESG Program Eligibility

- RRH
- Homelessness Prevention
- ESG-CV

CoC Program Eligibility

- RRH

RRH Eligibility FAQs

- **FAQ 529** **Question:** Is an individual or family that is receiving Rapid Re-Housing Assistance considered homeless for purposes of remaining eligible for other permanent housing placements?
- **FAQ 530** **Question:** Is an individual or family that is receiving Rapid Re-Housing Assistance considered chronically homeless for purposes of remaining eligible for permanent housing placements dedicated to serving the chronically homeless?

CoC and ESG Transfers

- **The CoC is responsible for developing an emergency transfer (24 CFR 5.2005(e))**

- **Temporary Housing**
  - Using Hotel/Motel Vouchers
  - Documenting temporary relocation

Utilizing Multiple Funding Streams

1

Using ESG with Other Subsidies

- Restrictions (24 CFR § 576.105(d) and 24 CFR § 576.106(c))

2

Using CoC with Other Subsidies

- Restrictions (Section 578.87)

Utilizing Multiple Funding Streams (Cont.)

Using CoC Funds with Other Subsidies

- Housing Choice Vouchers
- LIHTC
- ESG (ESG-CV)

Dual Enrollment

Could a client be enrolled in two RRH programs at the same time, given the clients would have met eligibility for both programs prior to being enrolled and funds are used for different cost types?

Could ESG-CV RRH funds be counted as match towards the match for the CoC grant?

Examples of Eligible Coordination Activities

- **Renters' Insurance** - Renters' insurance was recently added to the eligible uses of ESG/ESG-CV funds that are used to prevent, prepare for, respond to, and mitigate the impacts of coronavirus according to Notice CPD-21-08
- **Arrears** – ESG funds may be used to make a one-time payment for up to 6 months of rent in arrears on the tenant's portion of the rental payment can be provided even if a program participant is receiving rental assistance, including rental arrears assistance, through other public sources.
- **Match** - A CoC and ESG project could be provide match for each program, but they cannot provide match for the same costs.

CoC and PHA Coordination and Challenges

https://files.hudexchange.info/resources/documents/CoC-and-PHA-Collaboration-Strategies-for-CoCs-to-Start-the-Partnership-Conversation.pdf

https://files.hudexchange.info/resources/documents/The-Business-Case-For-Partnering-With-Public-Housing-Agencies-To-Serve-Homeless.pdf

ESG-CV Strategic Approach to Utilizing Funds

Approaching ESG-CV Expenditure Deadline

- HUD is not extending the 20% expenditure deadline (today!)
- Recipients that won't meet the 20% in time are strongly encouraged to submit the Spending Plan template you should have received from your CARES Act Desk Officer
- HUD is primarily relying on spending plan information and QPR expenditure data (due October 30) to make determinations whether to recapture funds.
- Don't stop spending! HUD is not automatically recapturing funds as of October 1 or switching off recipient access to funds.

Uses of ESG-CV Funds

- **Providing infectious disease training and mitigation resources** such as Personal Protective Equipment, access to handwashing stations, etc. to provider staff and program participants
- **Adapting and expanding emergency shelter options**, including non-congregate shelter options such as hotels and motels
- **Rapidly re-housing** individuals and families at scale
- **Supporting COVID-19 testing and vaccination** efforts
- Providing **homelessness prevention** assistance

Re-evaluating Your ESG-CV Approach

- Identify any activities that are particularly slow-moving and determine the cause (e.g., subrecipient capacity issues? Eviction moratorium?)
- Reassess community needs, especially considering COVID response (e.g., reinstating or expanding non-congregate shelter, isolation & quarantine; vaccine incentives)
- Recognize new resources that hadn't been available when initial funding decisions were made (e.g., Treasury Emergency Rental Assistance Program)
- Prioritize Rapid Re-housing and pandemic response activities such as emergency shelter
- Refer to this new resource: Re-evaluating Your ESG-CV Approach

ESG-CV Waivers

- **COVID-19 Homeless System Response: ESG-CV Notice CPD-21-08 Summary** – full list of applicable waivers are included with descriptions
- All ESG-CV waivers expire 9/30/2022 – this expiration date also applies to annual ESG funds (FY20 and older) used for COVID response

Strategic Use of ESG-CV Waivers

- FMR – using rent reasonableness to expand access to housing stock
- Extension of RRH and HP assistance – ensuring that no one times out of rental assistance or services
- Converting TES to ES without triggering disposition – this opens up greater access and flexibility of ESG-CV funds for temporary emergency shelter and emergency shelter
- Procurement – recipients have the ability to streamline their local processes for procuring contractors and goods

Strategic Use of ESG-CV Waivers (Cont.)

- Shelter standards for TES – communities are setting up NCS more quickly with the ability to omit shelter inspections and environmental review requirements
- PBRA flexibilities – providers are using the ability to pay rent on a vacant unit for an additional 30 days to keep their access to units
- Consultation & Citizen Participation – recipients are using this flexibility to amend their plans; shifting funds or adding new activities without going through public comment period

HQS vs. Habitability

- ESG-CV Notice permits the use of HQS or habitability.
- This resource provides a comparison of related standards.
- In general, HQS requires a higher standard (except for fire safety)
- ESG-CV Notice flexibility is intended to provide recipients and subrecipients with the option for a more streamlined process (if HQS is typically used by the community)

Duplication of Benefits

- ESG-CV recipients are required to establish and follow procedures to ensure that DOB does not occur.
- Establishing a process to effectively identify and prevent duplication of benefits is critical for ESG-CV recipients to effectively manage the multiple active funding streams related to coronavirus response and efficiently target ESG-CV resources to meet unmet needs within the community.
- “Order of Assistance” is not required. This means that a person or entity receiving ESG-CV funds is not required to apply to FEMA or any other specific source of assistance to qualify for ESG-CV assistance.

Duplication of Benefits Analysis – Activity Level

1. Determine total amount of need for the activity (could be for the entire jurisdiction (e.g., City projects ES costs at $x over the next quarter) or for each activity (e.g., Shelter X projects its costs at $X for the next quarter or year)
2. Determine amount of funding that has or will be provided from non-ESG-CV funding sources to pay for the cost
3. Calculate maximum level of ESG-CV award by comparing amount of assistance (step 1) to total need (step 2)
4. Document DOB analysis – documenting steps 1-3 and ESG-CV award amount to verify that amount of ESG-CV is equal to or lower than maximum level of award

Duplication of Benefits Analysis – Client Level

Only needed for RRH and HP

1. For each ESG-CV funded cost type (e.g., security deposits, utility payments, rental assistance) determine the total amount of financial assistance needed. Remember, the assessment only needs to be done for the same cost types as the ESG-funded activity.
2. Determine amount of funding that has or will be provided from non-ESG-CV funding sources to pay for the cost
3. Calculate maximum level of ESG-CV award by comparing amount of assistance (step 1) to total need (step 2)
4. Document DOB analysis – documenting steps 1-3 and ESG-CV award amount to verify that amount of ESG-CV is equal to or lower than maximum level of award

Federal Rehousing Resources

There is an extensive set of federal resources available to help communities prevent, prepare, and respond to the coronavirus pandemic among people experiencing or at risk of homelessness.

While most of the resources outlined are newly available funds through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, communities should consider how they can combine existing and new funding streams to fund programs and activities in their rehousing strategy.

These resources provide communities with the opportunity to strategically align funds to design a comprehensive rehousing plan that assists households most impacted by the pandemic.

https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-Federal-Rehousing-Resources.pdf

Federal Rehousing Resources (Cont.)

Funding Resource	Overview
Coronavirus Community Development Block Grant (CDBG-CV)	CDBG-CV may be used to address housing and community development needs created by the coronavirus, including supporting special populations at high risk for contracting the virus such as individuals and families who are homeless.
Coronavirus Relief Funds (CRF)	CRF may be used to cover necessary expenses related to addressing the pandemic. They are flexible dollars that can be leveraged to enhance your community's rehousing response or undertake new activities that may not be covered under other funding streams.
Coronavirus Emergency Solutions Grants (ESG-CV)	ESG-CV resources provide communities with the opportunity to strategically invest funds to limit the spread of COVID-19 by providing and maintaining housing solutions for people experiencing and at risk of homelessness.
HOME Investment Partnerships Program	HOME provides grants to states and localities to implement housing strategies designed to increase homeownership and affordable housing opportunities for low and very-low income households, including providing direct rental assistance.
Coronavirus Housing Opportunities for Persons with AIDS (HOPWA-CV)	HOPWA-CV can be used to maintain operations and for rental assistance, supportive services, and other necessary actions in order to prevent, prepare for, and respond to coronavirus.
Supportive Services for Veteran Families (SSVF) Program	SSVF funds can be used to provide housing-focused services and rental assistance to eligible veterans experiencing homelessness or at imminent risk of homelessness to help obtain or sustain housing.
Emergency Rental Assistance Program (ERAP)	ERAP funds are provided directly to states, U.S. territories, local governments, and (in the case of ERA1) Indian tribes or Tribally Designated Housing Entities, as applicable, and the Department of Hawaiian Home Lands. Grantees use the funds to provide assistance to eligible households through existing or newly created rental assistance programs.
Emergency Housing Voucher Program (EHV)	The Emergency Housing Voucher (EHV) program is available through the American Rescue Plan Act (ARPA). Through EHV, HUD is providing 70,000 housing choice vouchers to local Public Housing Authorities (PHAs) in order to assist individuals and families who are: homeless, at risk of homelessness, fleeing, or attempting to flee, domestic violence, dating violence, sexual assault, stalking, or human trafficking, or were recently homeless or have a high risk of housing instability.

Rebuilding and Transforming a Housing System

- Develop a coordinated funding approach that starts right away
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Housing with equity tips:

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Coordinated Investment Planning Case Studies

These case studies discuss how coordinated investment planning strategically aligns and commits resources from multiple sources to fund a community's rehousing strategy through a collaborative planning process.

Communities

Houston

Dakota County

Sacramento

https://www.hudexchange.info/resource/6162/covid19-homeless-system-response-coordinated-investment-planning-case-studies/

Rehousing & Coordinated Investment Planning Tool

This spreadsheet is a framework for communities to define and quantify their need for housing supports and services in light of the COVID-19 pandemic, and to plan to fulfill these needs with existing and newly available funding sources.

https://www.hudexchange.info/resource/6155/covid19-homeless-system-response-rehousing-and-coordinated-investment-planning-tool/

Ongoing Support from HUD

- COVID-19 Office Hours and training webinars
- Direct technical assistance
- Ask a Question (AAQ) desk
- Additional forthcoming toolkits and technical assistance resources

CoC Funding

&

Coordination with Other Programs

Crosscutting CoC and ESG Eligibility Criteria

ESG Program Eligibility

- RRH
- Homelessness Prevention
- ESG-CV

CoC Program Eligibility

- RRH

RRH Eligibility FAQs

- **FAQ 529 Question:** Is an individual or family that is receiving Rapid Re-Housing Assistance considered homeless for purposes of remaining eligible for other permanent housing placements?
- **FAQ 530 Question:** Is an individual or family that is receiving Rapid Re-Housing Assistance considered chronically homeless for purposes of remaining eligible for permanent housing placements dedicated to serving the chronically homeless?

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
COMMUNITY PLANNING & DEVELOPMENT

CoC and ESG Transfers

- **The CoC is responsible for developing an emergency transfer (24 CFR 5.2005(e))**

- **Temporary Housing**
  - Using Hotel/Motel Vouchers
  - Documenting temporary relocation

Utilizing Multiple Funding Streams

1

Using ESG with Other Subsidies

- Restrictions (24 CFR § 576.105(d) and 24 CFR § 576.106(c))

2

Using CoC with Other Subsidies

- Restrictions (Section 578.87)

U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT
COMMUNITY PLANNING & DEVELOPMENT

Utilizing Multiple Funding Streams (Cont.)

Using CoC Funds with Other Subsidies

- Housing Choice Vouchers
- LIHTC
- ESG (ESG-CV)

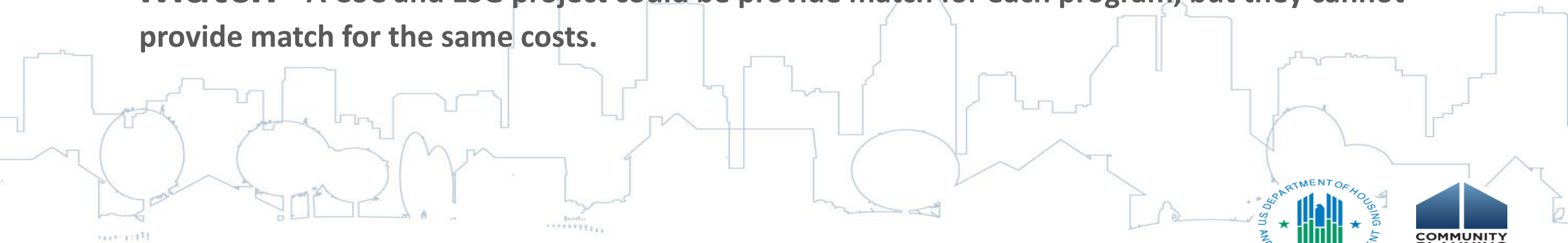
Dual Enrollment

Could a client be enrolled in two RRH programs at the same time, given the clients would have met eligibility for both programs prior to being enrolled and funds are used for different cost types?

Could ESG-CV RRH funds be counted as match towards the match for the CoC grant?

Examples of Eligible Coordination Activities

- **Renters' Insurance** - Renters' insurance was recently added to the eligible uses of ESG/ESG-CV funds that are used to prevent, prepare for, respond to, and mitigate the impacts of coronavirus according to Notice CPD-21-08
- **Arrears** – ESG funds may be used to make a one-time payment for up to 6 months of rent in arrears on the tenant's portion of the rental payment can be provided even if a program participant is receiving rental assistance, including rental arrears assistance, through other public sources.
- **Match** - A CoC and ESG project could be provide match for each program, but they cannot provide match for the same costs.



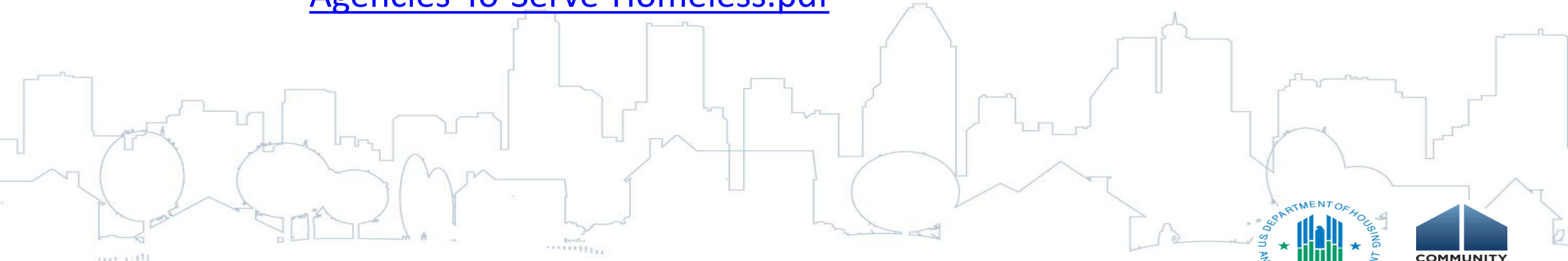
U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

COMMUNITY PLANNING & DEVELOPMENT

CoC and PHA Coordination and Challenges

https://files.hudexchange.info/resources/documents/CoC-and-PHA-Collaboration-Strategies-for-CoCs-to-Start-the-Partnership-Conversation.pdf

https://files.hudexchange.info/resources/documents/The-Business-Case-For-Partnering-With-Public-Housing-Agencies-To-Serve-Homeless.pdf

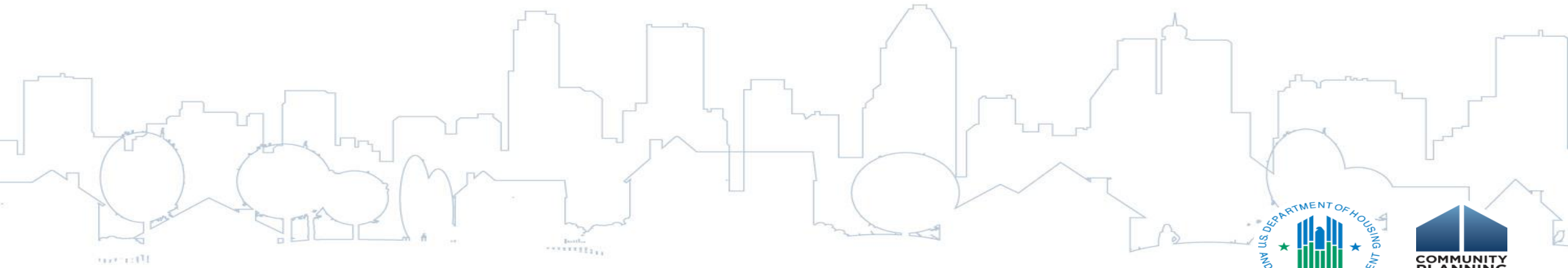


U.S. DEPARTMENT OF HOUSING AND URBAN DEVELOPMENT

COMMUNITY PLANNING & DEVELOPMENT

ESG-CV

Strategic Approach to Utilizing Funds



Approaching ESG-CV Expenditure Deadline

- HUD is not extending the 20% expenditure deadline (today!)
- Recipients that won't meet the 20% in time are strongly encouraged to submit the Spending Plan template you should have received from your CARES Act Desk Officer
- HUD is primarily relying on spending plan information and QPR expenditure data (due October 30) to make determinations whether to recapture funds.
- Don't stop spending! HUD is not automatically recapturing funds as of October 1 or switching off recipient access to funds.

Uses of ESG-CV Funds

- **Providing infectious disease training and mitigation resources** such as Personal Protective Equipment, access to handwashing stations, etc. to provider staff and program participants
- **Adapting and expanding emergency shelter options**, including non-congregate shelter options such as hotels and motels
- **Rapidly re-housing** individuals and families at scale
- **Supporting COVID-19 testing and vaccination** efforts
- Providing **homelessness prevention** assistance

Re-evaluating Your ESG-CV Approach

- Identify any activities that are particularly slow-moving and determine the cause (e.g., subrecipient capacity issues? Eviction moratorium?)
- Reassess community needs, especially considering COVID response (e.g., reinstating or expanding non-congregate shelter, isolation & quarantine; vaccine incentives)
- Recognize new resources that hadn't been available when initial funding decisions were made (e.g., Treasury Emergency Rental Assistance Program)
- Prioritize Rapid Re-housing and pandemic response activities such as emergency shelter
- Refer to this new resource: Re-evaluating Your ESG-CV Approach

ESG-CV Waivers

- **COVID-19 Homeless System Response: ESG-CV Notice CPD-21-08 Summary** – full list of applicable waivers are included with descriptions

- All ESG-CV waivers expire 9/30/2022 – this expiration date also applies to annual ESG funds (FY20 and older) used for COVID response

Strategic Use of ESG-CV Waivers

- FMR – using rent reasonableness to expand access to housing stock
- Extension of RRH and HP assistance – ensuring that no one times out of rental assistance or services
- Converting TES to ES without triggering disposition – this opens up greater access and flexibility of ESG-CV funds for temporary emergency shelter and emergency shelter
- Procurement – recipients have the ability to streamline their local processes for procuring contractors and goods

Strategic Use of ESG-CV Waivers (Cont.)

- Shelter standards for TES – communities are setting up NCS more quickly with the ability to omit shelter inspections and environmental review requirements
- PBRA flexibilities – providers are using the ability to pay rent on a vacant unit for an additional 30 days to keep their access to units
- Consultation & Citizen Participation – recipients are using this flexibility to amend their plans; shifting funds or adding new activities without going through public comment period

HQS vs. Habitability

- ESG-CV Notice permits the use of HQS or habitability.
- This resource provides a comparison of related standards.
- In general, HQS requires a higher standard (except for fire safety)
- ESG-CV Notice flexibility is intended to provide recipients and subrecipients with the option for a more streamlined process (if HQS is typically used by the community)

Duplication of Benefits

- ESG-CV recipients are required to establish and follow procedures to ensure that DOB does not occur.
- Establishing a process to effectively identify and prevent duplication of benefits is critical for ESG-CV recipients to effectively manage the multiple active funding streams related to coronavirus response and efficiently target ESG-CV resources to meet unmet needs within the community.
- “Order of Assistance” is not required. This means that a person or entity receiving ESG-CV funds is not required to apply to FEMA or any other specific source of assistance to qualify for ESG-CV assistance.

Duplication of Benefits Analysis – Activity Level

1. Determine total amount of need for the activity (could be for the entire jurisdiction (e.g., City projects ES costs at $x over the next quarter) or for each activity (e.g., Shelter X projects its costs at $X for the next quarter or year)
2. Determine amount of funding that has or will be provided from non-ESG-CV funding sources to pay for the cost
3. Calculate maximum level of ESG-CV award by comparing amount of assistance (step 1) to total need (step 2)
4. Document DOB analysis – documenting steps 1-3 and ESG-CV award amount to verify that amount of ESG-CV is equal to or lower than maximum level of award

Duplication of Benefits Analysis – Client Level

Only needed for RRH and HP

1. For each ESG-CV funded cost type (e.g., security deposits, utility payments, rental assistance) determine the total amount of financial assistance needed. Remember, the assessment only needs to be done for the same cost types as the ESG-funded activity.
2. Determine amount of funding that has or will be provided from non-ESG-CV funding sources to pay for the cost
3. Calculate maximum level of ESG-CV award by comparing amount of assistance (step 1) to total need (step 2)
4. Document DOB analysis – documenting steps 1-3 and ESG-CV award amount to verify that amount of ESG-CV is equal to or lower than maximum level of award

Federal Rehousing Resources

- There is an extensive set of federal resources available to help communities prevent, prepare, and respond to the coronavirus pandemic among people experiencing or at risk of homelessness.
- While most of the resources outlined are newly available funds through the Coronavirus Aid, Relief, and Economic Security (CARES) Act, communities should consider how they can combine existing and new funding streams to fund programs and activities in their rehousing strategy.
- These resources provide communities with the opportunity to strategically align funds to design a comprehensive rehousing plan that assists households most impacted by the pandemic.

https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-Federal-Rehousing-Resources.pdf

Federal Rehousing Resources (Cont.)

Funding Resource	Overview
Coronavirus Community Development Block Grant (CDBG-CV)	CDBG-CV may be used to address housing and community development needs created by the coronavirus, including supporting special populations at high risk for contracting the virus such as individuals and families who are homeless.
Coronavirus Relief Funds (CRF)	CRF may be used to cover necessary expenses related to addressing the pandemic. They are flexible dollars that can be leveraged to enhance your community's rehousing response or undertake new activities that may not be covered under other funding streams.
Coronavirus Emergency Solutions Grants (ESG-CV)	ESG-CV resources provide communities with the opportunity to strategically invest funds to limit the spread of COVID-19 by providing and maintaining housing solutions for people experiencing and at risk of homelessness.
HOME Investment Partnerships Program	HOME provides grants to states and localities to implement housing strategies designed to increase homeownership and affordable housing opportunities for low and very-low income households, including providing direct rental assistance.
Coronavirus Housing Opportunities for Persons with AIDS (HOPWA-CV)	HOPWA-CV can be used to maintain operations and for rental assistance, supportive services, and other necessary actions in order to prevent, prepare for, and respond to coronavirus.
Supportive Services for Veteran Families (SSVF) Program	SSVF funds can be used to provide housing-focused services and rental assistance to eligible veterans experiencing homelessness or at imminent risk of homelessness to help obtain or sustain housing.
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Wrap up and Reminders

Matthew LaMantia,

Director, Community Planning and Development

FY21 Deadlines and Reminders:
Applicable to ESG-CV Only:

Milestone Dates:

- HUD may recapture up to 20 percent of a recipient's total award, including first and second allocation amounts, if the recipient has not expended at least 20 percent of that award by September 30, 2021.
- HUD may recapture up to 80 percent of a recipient's total award, including first and second allocation amounts, if the recipient has not expended at least 80 percent of that award by March 31, 2022.
- 100 percent of ESG-CV funds must be expended for eligible activity costs by September 30, 2022

Programmatic Reminders:

- Quarterly reports must be submitted through SAGE within 30 days of the end of each calendar quarter – ***The next report is due October 30, 2021!***

HQ WILL BE IN CONTACT WITH SLOW SPENDERS

FY21 Deadlines and Reminders:
Applicable to ALL HUD CPD Programs:

Until a return to “Normal Operations”, the HUD Objections sections of public notices must include the CPD_COVID-19EE-COL@hud.gov instead of the Columbus Field Office physical address. If not included, contact Jordan Frase, Program Environmental Specialist at Jordan.C.Frase@hud.gov for instructions on how to publish a notice of correction.

Update Contact Information

ESG Grantees:

Please update contact information in IDIS:

- Grantee users with local administration authority can edit the contact information.
- Have a primary and secondary contact for each program you administer.

CoC Grantees:

Please update contact information in SAGE:

- The contacts from the Contact Information Form in the most recently submitted report will be used.

Please join us at the FY22 All CoC Grantee Meeting in the SPRING of 2022!