

State of Iowa

Part 1: General ESG Requirements



Today's Objective

To get comfortable with the fundamentals of the ESG program, including its requirements, components, and eligible activities.



Agenda

- Section 1 - Brief overview of the Emergency Solutions Grant Program
- Section 2 - HUD's Homeless Definitions
- Section 3 – ESG and ESG-CV Funding Allocations

ESG Overview

HEARTH Act of 2009 – revised what was called the Emergency Shelter Grants Program and renamed it the Emergency Solutions Grants Program

The ESG Interim Rule took effect on January 4, 2012. The Interim Rule is outlined in a Code of Federal Regulations titled 24 CFR 576.

ESG is a formula grant program for which funds are generally allocated to metropolitan cities, urban counties, territories, and states. Funding is allocated to Recipients.

A recipient is who signs the grant agreement directly with HUD. Recipients often contract with subrecipients to administer ESG funding at the local level – a subrecipient signs a grant agreement with the recipient.



Purpose of the ESG program

Engage homeless individuals and families living on the street

Improve the number and quality of emergency shelters for homeless individuals and families
– help operate emergency shelters

Provide essential services to shelter residents

Rapidly re-house homeless individuals and families

Prevent families and individuals from becoming homeless



Section 2: HUD's Homeless Definitions

Topics include:

- ✓ Homeless Definition and Categories
- ✓ At-Risk of Homeless Definition

HUD's Homeless Definitions

There are two definitions in HUD regulations related to homelessness:

- The Homeless Definition, and
ONLY IF an individual or family doesn't qualify under the homeless definition, there's a possibility they could qualify under the:
- "At-Risk" Definition (applies to Homelessness Prevention only)



Homeless Definition

Four Categories

Category 1 –
Literally Homeless

Category 2 –
Imminent Risk

Category 3 –
Homeless under
another Federal
Definition

Category 4 –
Fleeing/Attempting
to Flee Domestic
Violence



Category 1

Who qualifies as meeting the literally homeless definition?



An individual or family who lacks a fixed, regular, and adequate nighttime residence, and who....



Category 1

Who qualifies as meeting the literally homeless definition? Continued...

Resides in a public or private place not meant for regular sleeping accommodations, **or**

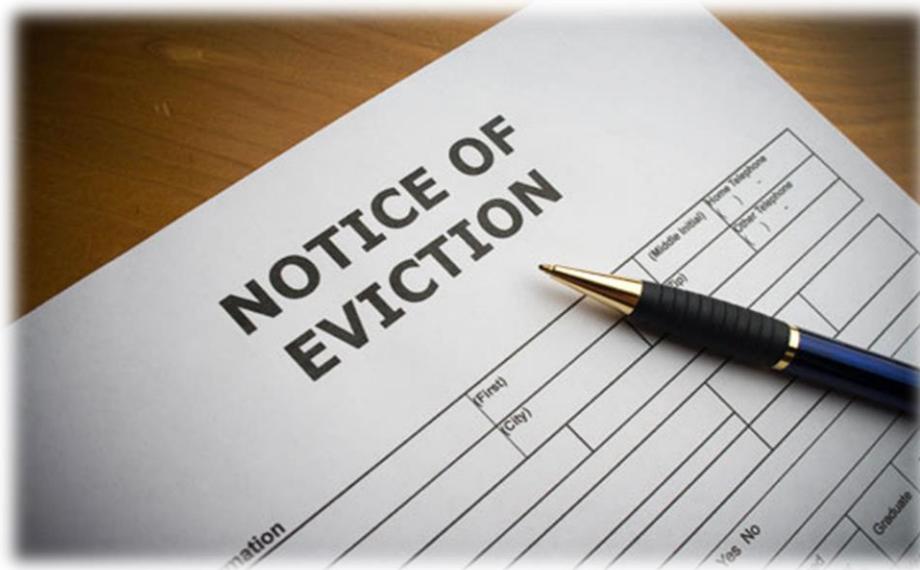
Reside in supervised publicly or privately operated shelters designated to provide temporary accommodations, **or**

Exiting an institution where they resided for 120* days or less and they resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.



Category 2

Who qualifies as imminent risk of homelessness?



An individual or family who will imminently lose their primary nighttime residence, provided that...



Category 2

Who qualifies as imminent risk of homelessness?

The primary will be lost within 14 days of the date of application for assistance;

No subsequent residence has been identified; **AND**

They lack the resources or support networks to obtain other permanent housing.



Category 3

Who qualifies as homeless under other Federal statutes?



Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who...



Category 3

Who qualifies as homeless under other Federal statutes? Continued.

Are defined as homeless under:

- Section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a),
- Section 637 of the Head Start Act (42 U.S.C. 9832),
- Section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2),
- Section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)),
- Section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012),
- Section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)), or
- Section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);

AND



Note: Serving individuals and families under this category requires prior HUD approval



Category 3

Who qualifies as homeless under other Federal statutes? Continued.

Have NOT had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;

AND



Category 3

Who qualifies as homeless under other Federal statutes? Continued.

Have experienced persistent instability as measured by **TWO** moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; **AND**



Category 3

Who qualifies as homeless under other Federal statutes? Continued.

Can be expected to continue in such status for an extended period because of:

- Chronic disabilities,
- Chronic physical health or mental health conditions,
- Substance addiction,
- Histories of domestic violence or childhood abuse/neglect,
- Presence of a child or youth with a disability, or
- Two or more barriers to employment



Category 4

Who qualifies under the *fleeing/attempting to flee DV homeless definition?*

Any individual or family who...

- Is fleeing, or is attempting to flee:
 - Domestic violence,
 - Dating violence,
 - Sexual assault,
 - Stalking, or
 - Other dangerous conditions that relate to violence against,

That has either taken place within their primary nighttime residence or has made them afraid to return to their primary nighttime residence;

AND



Category 4

Who qualifies under the *fleeing/attempting to flee DV homeless definition? Continued...*

Who lacks the resources or support networks (e.g., family, friends, faith-based or other social networks), to obtain other permanent housing.



HUD's At Risk Of Homelessness Categories

- Category 1 – Individuals & Families
- Category 2 – Unaccompanied Children and Youth
- Category 3 – Families with Children and Youth



At-Risk: Category 1

An Individual or Family who:

1. Has an annual income below 30* percent of median family income for the area

AND

2. Does not have sufficient resources or support networks, immediately available to prevent them from moving to an emergency shelter or another place described in Category 1 of Homeless Definition

AND...



At-Risk: Category 1

3. Meets one of the following conditions:

- Has moved because of economic reasons 2 or more times during the 60 days immediately prior to application*;
- Is living in the home of another because of economic hardship;
- Has been notified in writing that their right to occupy their current housing will be terminated within 21 days of application*;
- Lives in a hotel or motel and the cost of the hotel or motel stay is NOT paid by charitable organizations or by federal, state, or local government programs for low-income individuals;
- Lives in a crowded housing, defined as SRO or efficiency apartment unit in which there reside more than two persons, or lives in a larger housing unit in which there reside more than 1.5 people per room;
- Is exiting a publicly funded institution, or system of care (health-care facility, a mental health facility, foster care, or correction program or institution);
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the community's approved consolidated plan;



At-Risk: Category 2

A child or youth who does not qualify as “homeless” under the HUD Homeless Definition, but qualifies as “homeless” under one of the following:

Act	Section
Runaway and Homeless Youth Act	Section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)),
Head Start Act	Section 637(11) of the Head Start Act (42 U.S.C. 9832(11)),
Violence Against Women Act of 1994	Section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)),
Public Health Service Act	Section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)),
Food and Nutrition Act of 2008	Section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or
Child Nutrition Act of 1966	Section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15));



At-Risk: Category 3



A child or youth who does not qualify as “homeless” under the HUD homeless definition but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.



Quizzes!



Which homeless category applies?

Marvin is staying at a local homeless shelter, which homeless category applies?

- A. Imminent Risk – Category 2
- B. Literally Homeless – Category 1

Category 1

Which homeless category applies?

Shawna's primary residence will be lost within 14 days, no other resources available and no other residence identified, which homeless category applies?

A. Literally Homeless – Category 1

B. Imminent Risk – Category 2

Category 2



*Why does the homeless definition
and documentation matter?*



Homeless Documentation Requirements

Documenting homelessness and at risk of homelessness status is one of the most important duties of grant administration.

Recipients must have written policies and procedures that:

- Require intake staff to document eligibility at intake/screening
- Specify the evidence that must be used to establish and verify homeless or at-risk status
- Include standards for documenting due diligence

Standards must be consistent with recordkeeping requirements and reflect HUD's preferred order.

Documentation of each program participant's qualification as homeless or at risk of homelessness and other program participant records must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.



At a glance!

Which homeless definition applies to ESG eligible activities?

Activity	Homeless Definition				"At Risk" Definition
	Category 1: Literally Homeless	Category 2: Imminent Risk of Homelessness	Category 3: Homeless under other Federal Statutes*	Category 4: Fleeing/ Attempting to Flee DV	
Street Outreach	✓	✗	✗	✓	✗
Emergency Shelter	✓	✓	✓	✓	✗
Rapid Re-Housing	✓	✗	✗	✓	✗
Homelessness Prevention	✗	✓	✓	✓	✓



Section 3: ESG and ESG CV Funding Allocations

Topics include:

- ✓ Recipient Funding and Responsibilities
- ✓ ESG Waiver Notice – Key Elements



Recipient Funding and Responsibilities

- Each ESG recipient receives a regular ESG allocation each year as well as an ESG-CV allocation (split into two allocations)
- The ESG recipient must determine which, if any, regular ESG will be designated as preparing, preventing, and responding to Coronavirus
 - Besides FY21 allocation, SNAPS recommends all ESG funds be designated for response to Coronavirus
 - Funds NOT designated as responding to coronavirus follow regular ESG guidance



Recipient Funding and Responsibilities

- The recipient must determine which changes to ESG will be allowed
 - As changes must be reflected in the Con Plan/Annual Action Plan
 - Activities must be setup/designated in IDIS
 - Any necessary environmental reviews/minimum use requirements must be completed and recorded
 - Recipient must track progressive spending deadlines
 - Reporting requirements
- Program participants do not have to prove/document how they were affected by coronavirus



ESG-CV Waiver Notice Key Elements

- Changes to spending deadlines for temporary and regular emergency shelter
- New activities:
 - Loaning cell phones
 - PPE (HP and RRH)
 - Laundry for unsheltered
 - Vaccine incentive payments
 - Furniture for RRH and HP participants
 - Essential services for RRH and HP participants
 - Renter's insurance



ESG-CV Waiver Notice – Key Elements

- Changed income limits (30% to 50%)
- Subleases are now allowable
- Waiving 24-month cap on assistance
- Inspections
- No prerequisites for services
- FMR waiver



Wrap-Up

- Questions?
- Comments?
- Concerns?

