

State of Iowa

Part 2: ESG Component Eligible Costs



Questions from Last Session?





Street Outreach



Street Outreach

Who are eligible program participants?

Unsheltered individuals and families

- Individuals and families who qualify under paragraph (1)(i) of the definition of homeless.



Street Outreach

What are the eligible costs?

- ✓ Engagement
- ✓ Case Management
- ✓ Emergency Health Services
- ✓ Emergency Mental Health Services
- ✓ Transportation
- ✓ Services to Special Populations



Street Outreach

Engagement – eligible costs

Description	Detail
<p>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.</p>	<p>Initial assessment of needs and eligibility</p> <p>Providing crisis counseling</p> <p>Addressing urgent physical needs</p> <p>Actively connecting and providing info and referral</p> <p>Cell phone costs of outreach workers</p>



Street Outreach

Case management – eligible costs

Description	Detail
<p>Assessing housing and service needs and arranging/coordinating/ monitoring the delivery of individualized services.</p>	<ul style="list-style-type: none">Cost of using - centralized or coordinated assessment systemInitial evaluation/verifying and documenting eligibilityCounselingDeveloping/securing/coordinating servicesHelping obtain Federal, state, and local benefitsMonitoring/evaluating participant progressProviding information and referral to other providersDeveloping and individualized housing/service plan



Street Outreach

Emergency Health Services

Description	Detail
<p>Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.</p>	<ul style="list-style-type: none">Assessing participants' health problems and developing treatments plansAssisting participants to understand their health needsProviding or helping participants obtain appropriate emergency medical treatmentProviding medication and follow-up services



Street Outreach

Mental Health Services – eligible costs

Description	Detail
<p>Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (e.g., streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility.</p>	<p>Assessing participants' health problems and developing treatments plans</p> <p>Assisting participants to understand their health needs</p> <p>Providing or helping participants obtain appropriate emergency medical treatment</p> <p>Providing medication and follow-up services</p>



Street Outreach

Transportation – eligible costs

Description	Detail
<p>Travel by outreach workers, social workers, medical professionals or other service providers during the provision of eligible street outreach services.</p>	<p>Transporting unsheltered people to emergency shelters or other service facilities</p> <p>Cost of a participant's travel on public transit</p> <p>Mileage reimbursement for outreach workers to visit participants</p> <p>Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes and maintenance for the vehicle</p> <p>Costs of staff to accompany or assist participants to use public transportation</p>



Street Outreach

Services to Special Populations

Description	Detail
<p>Essential Services that have been tailored to 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.</p>	<p>Engagement Case Management Emergency Health Services Emergency Mental Health Services Transportation</p>





Emergency Shelter



Emergency Shelter

What is the definition of an emergency shelter?

Any facility, the primary purpose of which is to provide a temporary shelter for the homeless in general or for specific populations of the homeless and which does not require occupants to sign leases or occupancy agreements.

Must meet certain requirements

- Habitability
- Equal Access



Emergency Shelter

Who is eligible for emergency shelter?

Individuals and families who are homeless.

Reminder!

Expenditure limits for emergency shelter (and street outreach) are not applicable to:

- ESG-CV funding or annual ESG allocations, including prior year allocations if those funds are designated to prevent, respond, prepare for COVID response



Emergency Shelter

What are the eligible activities?

Four activities:

- Essential Services (case management, mental health services, etc.)
- Shelter Operation
- Shelter Renovations & Repairs
- Assistance Required under Uniform Relocation Act (URA)



Emergency Shelter

What are the eligible essential services costs?

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



Emergency Shelter

Case management – eligible costs

Activity Description	Eligible Costs
<p>Assessing housing and service needs and arranging/coordinating/ monitoring the delivery of individualized services.</p>	<ul style="list-style-type: none">Cost of using - centralized or coordinated assessment systemInitial evaluation/verifying and documenting eligibilityCounselingDeveloping/securing/coordinating servicesHelping obtain Federal, state, and local benefitsMonitoring/evaluating participant progressProviding information and referral to other providersProviding ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalkingDeveloping and individualized housing/service plan



Emergency Shelter

Childcare – eligible costs

Activity Description	Eligible Costs
Licensed childcare for program participants with children under the age of 13, or disabled children under the age of 18.	Childcare costs Meals and snacks Comprehensive and coordinated sets of appropriate developmental activities



Emergency Shelter

Education services – eligible costs

Activity Description	Eligible Costs
Instruction or training to enhance participants' ability to obtain and maintain housing, literacy, English literacy, GED, consumer education, health education, and substance abuse prevention.	Educational services/skill-building Screening, assessment and testing Individual or group instruction Tutoring Provision of books, supplies and instructional material Counseling Referral to community resources



Emergency Shelter

Employment assistance and job training

Activity Description	Eligible Costs
Services assisting participants to secure employment and job training	Classroom, online and/or computer instruction On-the-job instruction Job finding, skill-building Reasonable stipends in employment assistance and job training programs Books and instructional material Employment screening, assessment, or testing Structured job seeking support Training and tutoring, including literacy training and pre-vocational training Counseling or job coaching Referral to community resources



Emergency Shelter

Outpatient health services

Activity Description	Eligible Costs
Direct outpatient treatment of medical conditions provided by licensed medical professionals.	<p>Assessing health problems and developing a treatment plan</p> <p>Assisting program participants to understand their health needs</p> <p>Providing or helping participants obtain appropriate medical treatment, preventative medical care, and health maintenance services, including emergency medical services</p> <p>Providing medication and follow-up services</p> <p>Providing preventative and non-cosmetic dental care</p>



Emergency Shelter

Legal services

Activity Description	Eligible Costs
<p>Necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing.</p>	<p>Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service</p> <p>Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling</p> <p>Filing fees and other necessary court costs</p>
<p>Legal representation and advice to resolve legal problems that prevent participants from obtaining or retaining permanent housing.</p>	<p>Child support, guardianship, paternity</p> <p>Emancipation</p> <p>Legal separation</p> <p>Resolution of outstanding criminal warrants</p> <p>Appeal of veterans and public benefit claim denials</p> <p>Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking</p>



Emergency Shelter

Life skills training

Activity Description	Eligible Costs
Critical life management skills necessary to assist the program participant to function independently in the community.	Budgeting resources Managing money Managing a household Resolving conflict Shopping for food and needed items Improving nutrition Using public transportation Parenting classes



Emergency Shelter

Life skills training

Activity Description	Eligible Costs
<p>Critical life management skills necessary to assist the program participant to function independently in the community.</p>	<ul style="list-style-type: none">Budgeting resourcesManaging moneyManaging a householdResolving conflictShopping for food and needed itemsImproving nutritionUsing public transportationParenting classes



Emergency Shelter - Mental Health Services

Direct outpatient treatment of mental health conditions by licensed professionals.

Eligible costs:

- Crisis interventions
- Individual, family or group therapy sessions
- Prescription of psychotropic medications or explanations about the use of management of medications
- Combinations of therapeutic approaches to address multiple problems



Emergency Shelter - Substance Abuse Treatment Services

Substance abuse treatment services provided by licensed or certified professionals, designed to prevent, reduce, eliminate or deter relapse of substance abuse or addictive behaviors.

Eligible costs:

- Client intake and assessment
- Outpatient treatment for up to thirty days
- Group and individual counseling
- Drug testing



Emergency Shelter - Transportation

Costs of travel by program participants to and from medical care, employment, childcare, or other facilities that provide eligible essential services; and costs of staff travel to support provision of essential services.

Eligible costs:

- Cost of a program participant's travel on public transportation
- Mileage allowance for service workers to visit participants
- Purchasing or leasing a vehicle used for transport of participants and/or staff serving participants, including the cost of gas, insurance, taxes and maintenance for the vehicle



Emergency Shelter - Services for Special Populations

Otherwise, eligible essential services tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/ threats, and people living with HIV/AIDS in emergency shelters.

Eligible costs:

- Legal services
- Life skills training
- Mental health services
- Substance abuse treatment services
- Transportation
- Case management
- Child care
- Education services
- Employment assistance and job training
- Outpatient Health services



Emergency Shelter Eligibility/ Documentation

Household must meet either:

- Category 1: Literally Homeless
OR
- Category 2: Imminent Risk of Homelessness
OR
- Category 3: Homeless under other Federal Statutes
OR
- Category 4: Fleeing/Attempting to Flee DV

There are no income eligibility requirements associated with the Emergency Shelter component



Comparison of Activities

Street Outreach (unsheltered homeless persons)	Emergency Shelter Services (sheltered homeless persons)
Engagement	
Case Management	Case Management
	Child Care
	Educational Services
	Employment Assistance / Training
Emergency Health Care	Outpatient Health Services
	Legal Services
	Life Skills Training
Emergency Mental Health Care	Mental Health Services
Services for Special Populations	Services for Special Populations
	Substance Abuse Treatment
Transportation	Transportation





Shelter Operations



Shelter Operations

Costs to operate and maintain emergency shelter and provide emergency lodging when appropriate.

Eligible Participants:

- Individuals and families who are homeless.

Shelter Operations

Eligible costs:

- Food
- Furnishings
- Equipment
- Supplies necessary for the operation of the emergency shelter
- Hotel or motel vouchers for family or individual (only eligible when no appropriate emergency shelter is available)
- Maintenance (including minor or routine repairs)
- Rent
- Security
- Fuel
- Insurance
- Utilities





Shelter Rehabilitation and Repair



THE **CLOUDBURST** GROUP

Emergency Shelter - Rehabilitation and Renovation

Renovating buildings to be used as emergency shelter for homeless families and individuals.

Eligible costs:

- Labor
- Materials
- Tools
- Other costs for renovation, including soft costs
- Major rehabilitation of an emergency shelter
- Conversion of a building into an emergency shelter



Emergency Shelter - Rehabilitation and Renovation

Minimum Period of Use:

Activity	Use Requirement	Building Valuation
Major Rehabilitation	10 year*	If rehab costs exceed 75% of the value of the building <u>before rehab</u>
Conversion	10 year*	If rehab costs exceed 75% of the value of the building <u>after rehab</u>
Other Renovation	3 Year	If rehab costs are 75% or less of the value of the building <u>before rehab</u>



Special notes due to COVID/Notice CPD-21-08

- No prerequisites for shelter entry
- Housing stability case management for 60 days (instead of 30)
- Emergency shelter and Street Outreach cap waived
- Definition of homeless for institutions changed from 90 to 120 days



New Activities and Costs Due to COVID/Notice CPD-21-08

- Temporary emergency shelter (including hotels)
- Acquisition (not construction)
- Loaning equipment to participants
- PPE
- Laundry services for unsheltered
- Vaccine incentive payments (ES and SO only)
- Training on infectious disease
- Hazard pay
- Handwashing stations and portable bathrooms for unsheltered
- Volunteer incentives





Rapid Re-Housing and Homeless Prevention



Rapid Re-Housing

Purpose:

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:

- Category 1 – Literally Homeless
- Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)

There are no income eligibility requirements associated with initial eligibility



Homeless Prevention

Purpose:

ESG funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition

Eligible Participants:

- Category 2 – Imminent Risk
- Category 3 – Homeless under another Federal Definition
- Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
- At Risk Of Homelessness Categories

Initial income eligibility requirements apply



Rapid Re-Housing and Homeless Prevention

Overview of Eligible Activities:

- Short- and medium-term rental assistance*
- Housing relocation and stabilization services
- Staff salaries related to carrying out rapid re-housing and homelessness prevention activities are also eligible.



Rapid Re-Housing

Reassessment required at one year:

- Individuals and families must have an income at, or below, 30% AMI*

AND

- Lack the resources or support networks to help them retain or obtain other appropriate housing



Homeless Prevention

Reassessment required at intake and every three* months:

- Individuals and families must have an income at, or below, 30% AMI*

AND

- Lack the resources or support networks to help them retain or obtain other appropriate housing



Rapid Re-housing and Homeless Prevention

Financial Assistance and Services



Rapid Re-housing and Homeless Prevention

Housing Relocation and Stabilization Services

Financial Assistance

- Moving Costs
- Rent Application Fees
- Security Deposit
- Last Month's Rent
- Utility Deposit
- Utility Payments

Services

- Housing Search and Placement
- Housing Stability Case Management
- Mediation
- Legal Services
- Credit Repair



Eligible Assistance

Types of Assistance	Key Factors
Short Term Rental Assistance	Up to 3 Months
Medium Term Rental Assistance*	4 to 24 Months*
Payment of Rental Arrears	One Payment up to 6 months including late fees
Any Combination the Three* Types of Rental Assistance	Total not to exceed 24 months during any 3-year period, including any payment for last month's rent *



Financial Assistance

Rental Application Fees	Application fee that is charged by the owner to all applicants
Security Deposits	Equal to no more than 2 month's rent
Last Month's Rent	Paid to the owner of housing at the time security deposit and first month's rent are paid
Moving Costs	Moving costs, such as truck rental or hiring a moving company, including certain temporary storage fees
Utility Deposits	Standard utility deposit required by the utility company for all customers
Utility Payments	Up to 24 months of utility payments per participant, per service (e.g. gas, electric, water/sewage), including up to 6 months of arrearages, per service.



Short- and Medium-Term Rental Assistance

- Tenant-Based Rental Assistance
 - Program participants select a housing unit in which to live (may be within a specified service area). Assistance ‘moves’ the program participant.
- Project-Based Rental Assistance
 - Recipients or subrecipients identify permanent housing units that meet ESG requirements and enter into a rental assistance agreement with the owner to reserve the unit and subsidize its rent so that eligible program participants have access to the units. Assistance ‘stays’ with the unit, not the program participant.



Short- and Medium-Term Rental Assistance

- Sponsor-Based*

Short- and Medium-Term Rental Assistance

Compliance with Habitability Standards*

Compliance with Fair Market Rent (FMR) *

- Assisted units must be at or below FMR for area and unit size for rent + utilities
- FMR's can be found at:
<http://www.huduser.org/portal/datasets/fmr.html>

Rent Reasonableness

- Documented with data on file for comparable units (size, location, rent amounts)



Short and Medium-Term Rental Assistance

More information about rent reasonableness and FMR....

Under the ESG program, the applicability of the rent reasonableness standard and FMR requirement will vary depending on the type of ESG funds being used and the type of assistance being provided.

- **Annual ESG funds (used for non-COVID purposes):** All housing for which rental assistance payments are made must meet FMR and rent reasonableness standards. (24 CFR 576.106(d)).
- **ESG-CV and annual ESG funds used to prevent, prepare for, respond to, and mitigate the impacts of coronavirus:** FMR requirement is waived so long as the rent complies with HUD's standards of rent reasonableness.
- **Housing Stabilization and Relocation Services and Rental Arrears:** Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services or rent arrears.



Short- and Medium-Term Rental Assistance

Rental Assistance Agreement and Lease Standards:

- The rental assistance agreement must set forth the terms under which rental assistance will be provided.
- Each participant receiving rental assistance must have a legally binding, written lease/sublease* (between the owner and participant) for the rental unit, unless the assistance is solely for rental arrears
- Project-based rental assistance leases must have an initial term of one year.



Short- and Medium-Term Rental Assistance

Cannot use with other subsidies:

- No rental assistance can be provided to a household receiving rental assistance from another public source for same time period (except 6 months of arrears)
- Rental assistance may not be provided to participants who are currently receiving replacement housing payments under the URA (Uniform Relocation Assistance)
- Example: Persons living in public housing units, using housing choice vouchers, or residing in project based assisted units cannot receive monthly rental assistance under ESG.



Short- and Medium-Term Rental Assistance

- The rental assistance agreement must contain the same payment due date, grace period, and late payment penalty requirements as the program participant's lease.
- The recipient or subrecipient must make timely payments to owners in accordance with the rental assistance agreement.
- The recipient or subrecipient is solely responsible for paying (with non-ESG funds) late payment penalties that it incurs.



Rapid Re-Housing

- **Maximum Period***: The total period for which any program participant may receive the services must not exceed 24 months during any 3-year period
- **Discretion to Set Cap**: The recipient **MAY** set a maximum dollar amount and maximum period for which a program participant may receive any of the types of assistance or services described within the regulatory maximums.



Housing Relocation and Stabilization Services

General Requirements:

- Participants must meet with a case manager at least once a month* for the duration of assistance, except where funding under Violence Against Women Act of 1994 (VAWA) or the Family Violence Prevention and Services Act (FVSP) prohibits the recipient or subrecipient from making shelter or housing conditional upon the receipt of services.
- Participants must be assisted, as needed, in obtaining:
 - Appropriate supportive services like medical or mental health like medical or mental health treatment or services essential for independent living
 - Mainstream benefits like Medicaid, SSI, or TANF



Housing Relocation and Stabilization Services

Housing Stability Case Management

- Assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability.
- Eligible Costs Include:
- Using coordinated assessment system to conduct the initial evaluation and re-evaluation
- Counseling
- Developing, securing and coordinating services including Federal, state, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan



Housing Relocation and Stabilization Services

Housing Search and Placement Eligible Costs:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search and outreach to and negotiation with owner
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with ESG requirements for habitability, lead based paint, and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling



Housing Relocation and Stabilization Services

Mediation

- Mediation between the program participant and the owner or person(s) with whom the program participant is living, to prevent the program participant from losing permanent housing in which they currently reside.

Eligible Costs:

- Time and/or services associated with mediation activities



Housing Relocation and Stabilization Services

Legal Services

- Legal services that are necessary to resolve a legal problem that prohibits the program participant from obtaining or maintaining permanent housing permanent housing.

Eligible Costs

- Hourly fees for legal advice and representation
- Fees based on the actual service performed (i.e., fee for service), but only if the cost would be less than the cost of hourly fees
- Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling
- Filing fees and other necessary court costs
- Subrecipient's employees' salaries and other costs necessary to perform the services, if the subrecipient is a legal services provider and performs the services itself



Housing Relocation and Stabilization Services

Legal Services

- Legal representation and advice may be provided for:
- Landlord/tenant matters
- Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking
- Paternity
- Child support
- Guardianship
- Emancipation
- Legal separation
- Appeal of veterans and public benefit claim denials
- Resolution of outstanding criminal warrants

Services must be necessary to resolve a legal problem that prevents a participant from obtaining or maintaining permanent housing



Housing Relocation and Stabilization Services

Credit Repair

- Services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report and resolving personal credit problems personal credit report, and resolving personal credit problems. *

Eligible Costs:

- Credit Counseling
- Other related services
- *Assistance cannot include the payment or modification of a debt.



Special notes due to COVID/Notice CPD-21-08

- No prerequisites for services
- Re-evaluation income limit raised to 50% AMI
- Caps on assistance (24 months in a 3-year period) waived
- 12 month medium term assistance waived
- Inspections (HQS)
- Inspections not required for housing relocation and stabilization services for individuals and families receiving homelessness prevention assistance
- Meeting monthly with case manager waived
- HP - Re-evaluate a program participant's eligibility (not less than once every three months) is waived but not less than once every six months.



New Activities and Costs due to COVID/Notice CPD-21-08

- Loaning cell phones
- PPE
- Furniture and furnishings
- Essential services
- Renter's insurance
- New allowances for project-based
- Sponsor-based assistance
- Subleasing
- Landlord incentives
- Volunteer incentives
- Hotel/motel costs



HMIS

What are eligible HMIS costs for recipients and subrecipients?

Hardware, Equipment and Software Costs related to HMIS participation, such as;

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, and faxes, and furniture



HMIS Costs

What are eligible HMIS costs for recipients and subrecipients?

Staff salary/fringe and costs associated with operating HMIS:

- Data collection
- Completing data entry
- Monitoring and reviewing data quality
- Completing data analysis
- Reporting to the HMIS Lead
- Training staff on using the HMIS or comparable database
- Implementing and complying with HMIS requirements



HMIS Costs

What are eligible HMIS costs for recipients and subrecipients?

Training and Overhead costs:

- Obtaining technical support and leasing office space
- Paying charges for electricity, gas, water, phone and service and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying costs of staff to travel to and attend HUD- sponsored and HUD-approved training on HMIS
- Paying staff travel costs to conduct intake
- Paying participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead.



HMIS Costs

What are eligible HMIS Lead costs?

Eligible costs include:

- Establishing, Hosting, and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data For HMIS
- Upgrading, customizing, and enhancing the HMIS
- Integrating and warehousing data – including development of data warehouse
- Administering the system
- Reporting to providers, the Continuum of Care, and HUD
- Conducting training on using the system or a comparable database, including traveling to the training



Administrative Costs

What are eligible administrative costs?

Annual allocations: Up to 7.5% of the total allocation amount may be used for admin costs

ESG-CV: Up to 10% of the total allocation amount may be used for admin costs



Administrative Costs

What are eligible administrative costs?

Eligible Administrative costs include:

- Providing management, oversight, and coordination
- Monitoring programs and evaluating performance
- Training on ESG requirements
- Preparing ESG & homelessness-related sections of the Consolidated Plan the Consolidated Plan
- Carrying out environmental review responsibilities

