



Emergency Solutions Grant – COVID-19 Policy Guidelines

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1. Program Overview

The Emergency Solutions Grant (ESG) program is a federal program administered by the Dept. of Housing and Urban Development (HUD) that provides funding to states and local governments for emergency services and housing supports for homeless and at-risk households. The Coronavirus Aid, Relief, and Economic Security Act of 2020 (CARES Act) provided for supplemental appropriation of Homeless Assistance Grants under the Emergency Solutions Grant. The Emergency Solutions Grant COVID-19 (ESG-CV) funds are to be used to prevent, prepare for and respond to the Coronavirus pandemic.

Projects funded with these funds must be low barrier with a housing first orientation. Per HUD guidance, individuals and families assisted with these funds must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which these funds are used, notwithstanding housing stability case management.

All funds shall be used to serve households in the Tacoma/Lakewood/Pierce County Continuum of Care's jurisdiction.

1.1 Prevent, Prepare for, and Respond to Coronavirus

The following definitions may be used:

- Prevent....coronavirus: means an activity designed to prevent the initial or further spread of the virus to people experiencing homelessness, people at-risk of homelessness, recipient or subrecipient staff, or other shelter or housing residents.
- Prepare for....coronavirus: means an activity carried out by a recipient or subrecipient prior to or during a coronavirus outbreak in their jurisdiction to plan to keep people healthy and reduce the risk of exposure to coronavirus and avoid or slow the spread of the disease.
- Respond to coronavirus: means an activity carried out once coronavirus has spread to people experiencing homelessness, provider staff, or once individuals and families lose or are at-risk of losing their housing as a result of the economic downturn caused by the coronavirus.

Grantees will ensure that mitigation practices are effectively implemented by collaborating with public health officials in disseminating information and resources to those experiencing homelessness. Whenever possible, grantees will move COVID affected clients to locations where they are not at risk of spreading the infection further.

A critical component to infectious disease prevention is ensuring that shelters and housing programs have the necessary supplies in stock to maintain a disease-free environment. Grantees shall take full responsibility to ensure that all programs identify and obtain needed supplies. If needed, training shall be provided to all staff on how to prevent, prepare and respond to COVID.

Projects funded with ESG-CV coordinate care for individuals who are sick and experiencing homelessness. This includes activities such as arranging transportation for individuals who are sick and/or securing an appropriate, safe location where people can stay during the illness. During quarantine, clients are provided with essentials: food, laundry, clothing, and prescriptions (as needed) as well as case management to determine and direct clients to needed services. Established relationships

and referral processes with local agencies help us to provide quick access to needed care for those experiencing homelessness.

1.2 Sources of ESG-CV & Definitions

Pierce County receives allocations of ESG-CV funds from two sources: directly from HUD, referred to as “County ESG-CV” and passed through from the WA State Dept of Commerce (Commerce), referred to as “State ESG-CV”. Pierce County has combined these allocations into one grant program, ESG-CV. For the purpose of these guidelines, unless otherwise specified, the term “ESG-CV” shall apply to all sources of ESG-CV funding received by Pierce County.

Additionally, in these guidelines, the term “grantee” refers to subrecipients of either source of ESG-CV funds from Pierce County. However, while reading the HUD ESG Interim Rule it is important to note the “recipient” in this case is the Pierce County and the “subrecipient” is the grantee. In Commerce’s ESG-CV Guidelines, the term “grantee” refers to both the lead grantee (Pierce County) and its subgrantees. The County ESG-CV Guidelines define eligible activities and populations to be served, which are subsets of what is listed in the ESG Interim Rule.

1.3 Additional Regulations & Guidelines

Program regulations are established in [24 CFR §576](#), the HUD ESG Interim Rule ([ESG Program and Consolidated Plan Conforming Amendment of 24 CFR Parts 91 and 576, Docket No. FR-5474-I-01, RIN 2506-AC29](#)) and Notice CPD-20-08 ([ESG-CV Notice](#)) issued September 1, 2020. HUD has a [quick reference guide](#) for use in determining eligible activities and costs under the ESG program. Further requirements established by Commerce are included in their [ESG-CV Guidelines](#). Any differing requirements between County ESG-CV requirements and State ESG-CV requirements will be noted throughout these guidelines.

Grant funds must be used for eligible activities that prevent, prepare for, and respond to the coronavirus as detailed in Section 4 below. The [ESG Program Interim Rule](#) applies except for the waivers and additional eligible activities established in the CARES Act and in the [ESG-CV Notice](#). These alternative requirements and flexibilities are also applicable to annual ESG funding when those funds are used to prevent, prepare for, and respond to coronavirus. Funded activities must be tied to the community response to COVID-19.

1.4 Prioritization of ESG-CV Funds

1.4.1 Homeless Prevention and Rapid Re-Housing

At the time of this writing, Pierce County has millions of dollars of funding available for Rental Assistance costs for households at-risk of homelessness, or what is traditionally known as Homelessness Prevention. Therefore, in order to make the best use of this funding, Pierce County has prioritized funding Rapid Re-Housing over Homelessness Prevention projects by removing Homelessness Prevention as an eligible activity. Given that there are no funded Homelessness Prevention projects, there is no further policy for Homelessness Prevention project with these funds.

1.4.2 Use of Rapid Re-Housing

In response to the pandemic and to minimize harm, Coordinated Entry will prioritize participants in ESG-CV funded Emergency Shelter or Temporary Emergency Shelter for placement into ESG-CV funded Rapid Re-Housing programs. This will also ensure that when such Emergency Shelters or Temporary Emergency Shelters projects necessarily end, the guests will not return to homelessness.

2. Administrative Requirements

2.1 Changes to Guidelines

Pierce County may revise these guidelines at any time. All grantees will be notified of updates to this guide and will receive via email the latest version. The most recent version will also be posted on Pierce County's website.

2.2 Monitoring

Pierce County will monitor grant activities. Grantees will be given a minimum of 30 days advance notice of monitoring, unless there are special circumstances that require immediate attention. The notice will specify the monitoring components.

2.3 Reimbursements

Grantees must bill the County monthly for reimbursement of allowable costs. Contract Payment Requests are due 21 working days following the month in which the grantee has incurred expenditures. The County shall issue payment no later than twenty-five working days after the receipt of complete and accurate billing information as determined by the County. The submission of incomplete or inaccurate billing information may delay the reimbursement process. Exceptions to billing procedures can be negotiated with Pierce County on a case-by-case basis. Invoices must be submitted electronically to PCCCHMLSIInv@piercecountywa.gov.

2.4 Budget Revisions

Budget revisions must be requested by contacting the grantee's assigned Contract Monitor and submitted using the Technical Submission form. Budget revisions requesting to move funds across Categories or Components will require a contract amendment.

2.5 Spending Timeline Requirements

Pierce County will monitor grant spending to ensure that grantees are on track to spend out funds. County ESG-CV funds used for the Emergency Shelter component must be expended by December 31, 2021. All other ESG-CV funds (both County ESG-CV used for all other components and all State ESG-CV) **must be expended by September 30, 2023.**

Additionally, all funds with a spending deadline of September 30, 2023, must meet ESG-CV spending milestones by the following deadlines:

- **September 30, 2021:** At least 20% of total award must be expended
- **June 16, 2022:** At least 50% of total award must be invoiced
- **September 30, 2023:** All funds must be expended by this date

If grantees do not meet these spending deadlines, funds may be recaptured.

3. Participant Eligibility

3.1 Categories of Homelessness

All grantees funded under the ESG-CV funding must use the definitions of homelessness found in HUD's regulations:

Category 1 – Literally Homeless: An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground, OR
- An individual or family living in a supervised publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state, or local government programs for low-income individuals), OR
- An individual who is exiting an institution where he or she resided for 120 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution

Category 2 – Imminent Risk of Homelessness: Individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance
- No subsequent residence has been identified, AND
- The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3 – 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:

- Are defined as homeless under the other listed federal statutes
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application
- Have experienced persistent instability as measured by two moves or more during in the preceding 60 days, and
- Can be expected to continue in such status for an extended period of time due to special needs or barriers

Category 4 – Fleeing/Attempting to Flee DV: Any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence
- Has no other residence, and
- Lacks the resources or support networks to obtain other permanent housing

3.2 Housing Status Eligibility by Component

All grantees must verify that its participants meet the definition of homelessness that is appropriate for the type of service being provided (aka housing status). The following is a list of the categories of homelessness that pertain to each of the ESG-CV components.

Street Outreach

- Category 1 – Literally Homeless
- Category 4 – Fleeing/Attempting to Flee DV (if household also meets criteria for Category 1)

Emergency Shelter

- Category 1 – Literally Homeless
- Category 2 – Imminent Risk of Homelessness
- Category 3 – Homeless Under Other Federal Statutes
- Category 4 – Fleeing/Attempting to Flee DV

Rapid Re-Housing

- Category 1 – Literally Homeless
- Category 4 – Fleeing/Attempting to Flee DV (if household also meets criteria for Category 1)

Programs may not use health status or lack of income to discriminate access to programs.

3.3 The Role of Coordinated Entry in Determining Eligibility & Prioritization

Pierce County utilizes the county-wide coordinated assessment system called “Coordinated Entry” for homeless households seeking housing assistance. For more information on Pierce County’s Coordinated Entry system, refer to the [Coordinated Entry Policy Manual](#). The role of Coordinated Entry in determining eligibility for ESG-CV projects varies by component.

3.3.1 Street Outreach and Emergency Shelter

Street Outreach and Emergency Shelter projects are not required to use Coordinated Entry. Therefore, eligibility for projects under these components may be evaluated by individual providers, as long as it is in accordance with ESG guidelines (see [24 CFR 576.401](#)).

3.3.2 Rapid Re-Housing

Eligibility for all Rapid Re-Housing assistance provided with ESG-CV funding will be evaluated by this Coordinated Entry system. The following process will be used:

- Households must willingly engage with Coordinated Entry for an eligibility screening and prioritization assessment.
- Households will be prioritized for a referral to RRH based on barriers to housing and harm.
- Highly prioritized households who qualify for Rapid Re-Housing services under ESG regulations will be referred to ESG-CV funded grantees for relevant services.

Rapid Re-Housing Assistance is prioritized for households with the longest history of homelessness and for households with the most severe service needs including coronavirus related needs through the Coordinated Entry system. Additionally, Coordinated Entry will prioritize participants in ESG-CV funded Emergency Shelter or Temporary Emergency Shelter for placement into ESG-CV funded Rapid Re-Housing programs.

3.4 Verifying Eligibility and Determining Need at Entry

All grantees, regardless of component, must verify and document housing status eligibility at project enrollment. Please see documentation requirements for each housing status in Section 6.1.

The core statutory protections of the Violence Against Women Act (VAWA) that prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking apply.

Additionally, at project enrollment, grantees must also determine the amount and type of assistance needed by the participant to regain stability in permanent housing. This determination must be conducted in cooperation with the participant and utilizing a strength-based and person-centered process and result in a Housing Stability Plan. Please see Section 5: Service Standards for more detailed information by component.

3.4.1 Duplication of Benefits

Duplication of benefits occurs when an individual or household receives financial assistance for the same service, during the same time period, from multiple funding sources. Additional sources of financial assistance and services provided to a household must be documented, and a determination must be made that there is no duplication of benefits. In order to prevent the duplication of benefits, all grantees shall:

- Determine and document if the household is receiving assistance from other sources (e.g., philanthropy, FEMA costs for temporary shelter, Emergency Rental Assistance Program, Community Development Block Grant-CV, State Consolidated Housing Grant, etc.) to avoid duplication of benefits and/or disqualification of the household from assistance.
- Reference any checklists, forms, or tools available to evaluate if the household is receiving assistance from other sources
- Ensure that an evaluation of a participant's benefits is conducted during re-evaluation.

3.4.2 Determinations of Ineligibility

For each participant determined ineligible to receive ESG-CV assistance, the record must include documentation of the reason for that determination.

3.5 Re-Evaluation of Eligibility

Re-evaluation of eligibility is not required for Street Outreach or Emergency Shelter participants.

Grantees administering Rapid Re-Housing assistance must re-evaluate the participant's eligibility and the types and amounts of assistance the participant needs at least once annually. At a minimum, each re-evaluation of eligibility must establish that:

- The participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD; and
- The participant lacks sufficient resources and support networks necessary to retain housing without ESG-CV assistance.

3.5.1 Changes in Participant Circumstance

It is not required that sub-recipients conduct a re-evaluation outside of the regular re-evaluation process if information becomes available to indicate that a household has (or may have) increased income or a change in household circumstances that affect eligibility for the program. Since it is NOT required, if the grantee receives information about a change in a participant's situation outside of the formal re-evaluation process (e.g., through case management or credit repair activities) then it has no immediate effect on the participant's eligibility for the program and assistance can continue until the next re-

evaluation. At that time, the re-evaluation will determine whether the participant continues to be eligible for assistance.

Grantees should start the data collection stage of an annual re-evaluation earlier than 30 days before it is due. Then, when the case manager is collecting documentation, the program may have a sense of whether or not the household would remain income-eligible at re-evaluation. If it appears as though the household may be over income, the case manager can work with the participant to confirm the accuracy of the income collected, ensure that no changes in income will occur before the re-evaluation is due, and begin to work on a transition plan for when assistance ends.

Finally, the program can schedule the formal annual re-evaluation meeting immediately after a rent payment so that the costs for rental assistance will be incurred (i.e., rent paid to the owner) before the participant's formal re-evaluation. This thoughtful planning and timing will allow a participant and landlord to make transition plans, continue with assistance for as long as eligible, and have more than a full month's notice that they will be fully responsible for the following month's rent.

4. Eligible Costs & Activities

Eligible Program Components are established by HUD in the [ESG Program Interim Rule](#). The guidance contained herein serves to simplify the implementation of the regulations and identify the activities selected for funding by Pierce County. ESG-CV funds may be used for three program areas: Street Outreach, Emergency Shelter, and Rapid Re-Housing Assistance. The [ESG-CV Notice](#) also establishes the following additional Eligible Activities: Temporary Emergency Shelters, Training, Hazard Pay, Handwashing Stations & Portable Bathrooms, Landlord Incentives, and Volunteer Incentives.

Additionally, all eligible costs and activities must be provided in accordance with the requirements and the written standards and procedures identified in the Section 5: Service Standards.

4.1 Street Outreach

Street Outreach meets the immediate needs of households experiencing unsheltered homelessness by connecting them with emergency shelter, housing, and/or critical health services. Street Outreach activities funded with ESG-CV must be consistent with CDC guidance related to street outreach and engaging people at increased risk of severe illness when contracting coronavirus, as well as established best practices.

Eligible Activities under the Street Outreach component include Engagement, Case Management, Emergency Health Services, Emergency Mental Health Services, Transportation, and Services for Special Populations. Each of these activities is described in more detail below.

Additionally, ESG-CV funding for street outreach to respond to COVID-19 may include providing masks, hand sanitizer, and soap to households experiencing unsheltered homelessness; outfitting staff with personal protective equipment; hazard pay; and providing reasonable incentives to volunteers (e.g. cash) who are helping to provide necessary services during the coronavirus outbreak.

4.1.1 Engagement

Activities to locate, identify, and build relationships with unsheltered homeless people for the purposes of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. Eligible costs include:

- Initial assessment of needs and eligibility
- Crisis counseling
- Addressing urgent physical needs (e.g. providing meals, blankets, clothes, or toiletries)
- Actively connecting and providing information and referral to programs targeted to homeless people and mainstream social service and housing programs
- Cell phone costs of outreach workers

4.1.2 Case Management

Assessing housing and service needs and arranging/coordinating/monitoring the delivery of individualized services. Eligible costs include:

- Using centralized or coordinated assessment system
- Conducting an initial evaluation, including verifying and documenting eligibility
- Counseling
- Developing/securing/coordinating services
- Helping to obtain Federal, State, and local benefits
- Monitoring/evaluating participant progress
- Providing information and referrals to other providers
- Developing an individualized housing/service plan, including planning a path to permanent housing stability

4.1.3 Emergency Health Services

Outpatient treatment of urgent medical conditions by licensed medical professionals in community-based settings (including streets, parks, and campgrounds) to eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility. Eligible costs include:

- Assessing participants' health problems and developing treatment plans
- Assisting participants to understand their health needs
- Providing or helping participants obtain appropriate emergency medical treatment
- Providing medication and follow-up services

4.1.4 Emergency Mental Health Services

Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Outpatient treatment of urgent mental health conditions by licensed professionals in a community-based setting (including streets, parks, and campgrounds) to those eligible participants unwilling or unable to access emergency shelter or an appropriate healthcare facility. Eligible costs include:

- Crisis interventions
- Prescription of psychotropic medications
- Explanation of the use and management of medications
- Combinations of therapeutic approaches to address multiple problems

4.1.5 Transportation

Travel by outreach workers, social workers, medical professionals, or other service providers during the provision of street outreach services. Eligible costs include:

- Transporting unsheltered people to emergency shelters or other service facilities
- Cost of a participant’s travel on public transportation
- Mileage allowance for outreach workers to visit participants
- Purchasing or leasing a vehicle for use in conducting outreach activities, including the cost of gas, insurance, taxes, and maintenance for the vehicle
- Travel costs of grantee staff to accompany or assist participants to use public transportation

4.1.6 Services to Special Populations

Otherwise eligible 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. Eligible costs include (as defined above):

- Engagement
- Case Management
- Emergency Health Services
- Emergency Mental Health Services
- Transportation

4.1.7 Handwashing Stations and Portable Bathrooms

ESG-CV funds may be used for costs of providing urgent, non-facility-based care to unsheltered households who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. To this end, funds may be used for portable hygiene services and the staffing, equipment, supplies and services to clean and maintain these facilities to support households experiencing unsheltered homelessness. Examples include handwashing stations and bathrooms (e.g. porta potties).

4.2 Emergency Shelter

Eligible Activities under the Emergency Shelter component include Essential Services and Shelter Operations, which are both detailed below. Emergency Shelter activities should be in alignment with recommended guidance to effectively manage infectious disease within the shelter during coronavirus. ESG-CV funding for Emergency Shelter to respond to COVID-19 may include providing cleaning supplies; personal protective equipment for staff and program participants; portable hygiene services; volunteer incentives; hazard pay; and furnishings such as room dividers and cots.

No household shall be denied access to safe housing, which may include alternative housing or a hotel room, even if they have been exposed or are symptomatic with coronavirus. Health-related questions should not determine admission, access to programs and should not be asked in order to screen people out of shelter. Additionally, the age of a child under age 18 must not be used as a basis for denying any family's admission to an Emergency Shelter that uses ESG-CV funding or services and provides shelter to families with children under age 18.

4.2.1 Essential Services

Essential Services include the following activities for individuals and families residing in Emergency Shelter:

- a. **Case Management:** The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the participants. Eligible costs include:
 - Using Coordinated Entry

- Conducting initial evaluation, including verifying and documenting eligibility
 - Counseling
 - Developing, securing, and coordinating services
 - Helping to obtain Federal, State, and local benefits
 - Monitoring and evaluating participant progress
 - Providing information and referral to other providers
 - Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault and stalking
 - Developing an individualized housing and service plan, including planning a path to permanent housing stability
- b. **Childcare:** Licensed childcare for program participants with children under the age of 13, or disabled children under the age of 18. Eligible costs include meals/snacks and comprehensive and coordinated sets of appropriate developmental activities.
- c. **Education Services:** When necessary for the program participant to obtain and maintain housing, the costs of improving knowledge and basic educational skills are eligible. Services include instruction or training in consumer education, health education, substance abuse prevention, literacy, English as a Second Language, and General Educational Development (GED). Eligible costs include:
- Screening, assessment and testing
 - Individual or group instruction
 - Tutoring
 - Provision of books, supplies, and instructional material
 - Counseling
 - Referral to community resources
- d. **Employment Assistance and Job Training:** The costs of job training programs and services assisting participants to secure employment, including:
- Classroom, online, and/or computer instruction
 - On-the-job instruction
 - Services that assist individuals in securing employment, acquiring learning skills, and/or increase earning potential, including:
 - Skills to secure and retain a job, including acquisition of vocational licenses and/or certificates
 - Employment screening, assessment, or testing
 - Structured job skills and job-seeking support
 - Special training and tutoring, including literacy training and pre-vocational training
 - Books and instructional material
 - Counseling or job coaching
 - Referral to community resources
 - Reasonable stipends for participants in employment assistance and job training programs
- e. **Outpatient Health Services:** Direct outpatient treatment of medical conditions provided by licensed medical professionals, provided that other appropriate health services are unavailable or inaccessible within the community. Eligible costs include:

- Assessing health problems and developing a treatment plan
 - Assisting participants to understand their health needs
 - Providing or helping participants obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services
 - Providing medication and follow-up services
 - Providing preventive and non-cosmetic dental care
- f. **Legal Services:** Funds may only be used for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community. Legal services are limited to those services necessary to help participants obtain housing.
- g. **Life Skills Training:** The costs of teaching critical life management skills that may never have been learned or have been lost during the course of physical or mental illness, domestic violence, substance use, and homelessness are eligible costs. These services must be necessary to assist the program participant to function independently in the community. Eligible costs include:
- Budgeting resources
 - Managing money
 - Managing a household
 - Resolving conflict
 - Shopping for food and needed items
 - Improving nutrition
 - Using public transportation
 - Parenting
- h. **Mental Health Services:** Mental health services are the application of therapeutic processes to personal, family, situational, or occupational problems in order to bring about positive resolution of the problem or improved individual or family functioning or circumstances. Problem areas may include family and marital relationships, parent-child problems, or symptom management. Services include direct outpatient treatment of mental health conditions by licensed professionals, provided that other appropriate mental health services are unavailable or inaccessible within the community. Eligible costs include:
- Crisis interventions
 - Individual, family, or group therapy sessions
 - Prescription of psychotropic medications or explanations about the use and management of medications
 - Combinations of therapeutic approaches to address multiple problems
- i. **Substance Abuse Treatment Services:** Treatment services provided by licensed or certified professionals that are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors. Services are eligible only if other appropriate substance abuse treatment is unavailable or inaccessible within the community. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs. Eligible costs include:
- Participant intake and assessment
 - Outpatient treatment for up to 30 days
 - Group and individual counseling

- Drug testing
- j. **Transportation:** Costs of travel by program participants to and from medical care, employment, childcare, or other facilities that provide eligible Essential Services, and the cost of staff travel to support provision of essential services. Eligible costs include:
- Cost of a 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
 - Travel costs of staff to accompany or assist program participants to use public transportation
- k. **Services for Special Populations:** Otherwise eligible 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 in Emergency Shelters. Eligible costs include all categories of Essential Services described above.

4.2.2 Shelter Operations

Costs to operate and maintain Emergency Shelters, including:

- Maintenance (including minor or routine repairs)
 - Rent
 - Security
 - Fuel
 - Equipment
 - Insurance
 - Utilities
 - Food
 - Furnishings
 - Supplies necessary for the operation of the emergency shelter
- a. **Hotel/Motel Costs:** Where no appropriate Emergency Shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual. Hotel/motel vouchers may be provided if shelter beds are available, but it is not safe for them to use because of the need for social distancing. Eligible costs include:
- A hotel or motel room directly or through a hotel or motel voucher
 - Cleaning of hotel or motel rooms used by program participants
 - Repairs for damage caused by program participants above normal wear and tear of the room

These flexibilities are provided to allow agencies to secure hotel and motel rooms more quickly to be available when needed to prevent the spread of coronavirus (for example, when a program participant needs to isolate to keep from spreading the virus to other shelter occupants or household members).

4.2.3 Temporary Emergency Shelter

Temporary Emergency Shelter is defined as a structure or any portion of a structure, which is used for a limited period of time because of a crisis, such as a natural disaster or public health emergency, to provide shelter for individuals and families displaced from their normal place of residence or sheltered or unsheltered locations. Grantees must retain documentation that the shelter met the definition of Temporary Emergency Shelter. Temporary Emergency Shelters are exempt from:

- Minimum standards for Emergency Shelters at [24 CFR 576.403\(b\)](#), though lead-based paint requirements still apply
- Environmental review
- Minimum period of use requirement ([24 CFR 576.102\(c\)\(2\)](#))

Funds may be used to pay for Temporary Emergency Shelters for individuals and families experiencing homelessness in order to prevent, prepare for, and respond to coronavirus. Participants cannot be required to sign leases or occupancy agreements, receive treatment, or perform any other prerequisite activities as a condition for staying in any shelter or receiving services. Eligible costs include:

- Leasing existing real property or temporary structures to be used as Temporary Emergency Shelters
- Shelter Operations costs including the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, supplies necessary for the operation of the Temporary Emergency Shelter
- Essential Services, as defined above

4.3 Rapid Re-Housing

Funds may be used to provide Rental Assistance and Housing Relocation and Stabilization Services as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve stability in that housing. This assistance, referred to as Rapid Re-Housing Assistance, may be provided to participants who meet the criteria under paragraph (1) of the “homeless” definition in [§ 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. For further details, please see the Participant Eligibility section.

Additionally, Rapid Re-Housing Assistance must be provided in accordance with the requirements and the written standards and procedures identified in the Section 5: Service Standards.

4.3.1 Rental Assistance

Grantees may provide a participant with up to 12 months of rental assistance. This assistance may be Short-Term Rental Assistance, Medium-Term Rental Assistance, payment of Rental Arrears, or any combination of this assistance, as defined below:

- Short-Term Rental Assistance: up to 3 months of rent
- Medium-Term Rental Assistance: 4 to 12 months of rent
- Payment of Rental Arrears: one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears

Except for a one-time payment of Rental Arrears on the tenant's portion of the rental payment, Rental Assistance cannot be provided to a participant who is already receiving Tenant-Based Rental Assistance, or living in a housing unit receiving Project-Based Rental Assistance or Operating Assistance, through other public sources. Rental Assistance may not be provided to a participant who has been provided

with replacement housing payments under the [Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970](#) (URA) during the period of time covered by the URA payments.

a. Emergency Transfer

If a participant is receiving Rental Assistance and meets the conditions for an Emergency Transfer under [24 CFR 5.2005\(e\)](#), funds may be used to pay amounts owed for breaking a lease to effect an Emergency Transfer. These costs are not subject to the 12-month limit on Rental Assistance.

4.3.2 Housing Relocation and Stabilization Services

Housing Relocation and Stabilization Services include the following costs:

- a. Financial Assistance:** Funds may be used to pay housing owners, utility companies, or other third parties. *Does not include rental assistance.* Eligible costs include:
- **Rent Application Fees:** Application fee that is charged by the owner to all applicants.
 - **Security Deposit:** Equal to no more than two months' rent.
 - **Last Month's Rent** (if necessary to obtain housing): Paid to the owner of housing at the time security deposit and first month's rent are paid.
 - **Utility Deposit:** Standard utility deposit required by the utility company for all customers (i.e. gas, electric, water/sewage). Garbage/recycling is ONLY eligible if it is included in the water/sewage bill for that area OR if it is included in the rent for all tenants; if it is a stand-alone bill, it is not eligible.
 - **Utility Payment:** Up to 18 months of utility payments per participant per service (i.e. gas, electric, water/sewage), including up to six months of arrearages, per service.
 - **Moving Costs:** Truck rental or hiring a moving company, including payment of temporary storage fees for up to three months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing. Payment of temporary storage fees in arrears is not eligible.
 - **Emergency Transfers:** If the participant meets the conditions for an emergency transfer under [24 CFR 5.2005\(e\)](#), then funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer.

Financial Assistance costs listed above cannot be provided to a participant who is receiving the same type of assistance through other public sources or to a participant who has been provided with replacement housing payments under the [Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970](#) (URA), during the period of time covered by the URA payments.

- b. Housing Search & Placement:** Services or activities necessary to assist participants in locating, obtaining, and retaining suitable permanent housing, include the following:

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

- c. **Housing Stability Case Management:** Funds may be used to pay cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to facilitate housing stability for a participant who resides in permanent housing or to assist a participant in overcoming immediate barriers to obtaining housing. This assistance cannot exceed 30 days during the period the program participant is seeking permanent housing. Component services and activities consist of:
- Using Coordinated Entry
 - Conducting the initial evaluation, including verifying and documenting eligibility
 - Counseling
 - Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
 - Monitoring and evaluating participant progress
 - Providing information and referrals to other providers
 - Developing an individualized housing and service plan (Housing Stability Plan), including planning a path to permanent housing stability
 - Conducting re-evaluations
- d. **Mediation:** Mediation between the participant and the owner or person(s) with whom the participant is living, provided that the mediation is necessary to prevent the participant from losing permanent housing in which they currently reside. Eligible costs include time and/or services associated with mediation services.
- e. **Legal Services:** Legal services necessary to resolve a legal problem that prohibits the participant from obtaining or maintaining permanent housing. Funds may only be used for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.
- f. **Credit Repair:** Eligible costs include credit counseling and services necessary to assist participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems (assistance cannot include the payment or modification of debt).
- g. **Housing Counseling:** In [24 CFR part 5.100](#), HUD defines Housing Counseling is independent, expert advice customized to the need of the consumer to address the consumer's housing barriers and to help achieve their housing goals and must include the following processes: Intake; financial and housing affordability analysis; an action plan, except for reverse mortgage counseling; and a reasonable effort to have follow-up communication with the client when possible.

The content and process of housing counseling must meet the standards outlined in [24 CFR part 214](#) and in accordance with [24 CFR part 5.111](#). When grantees provide housing services to eligible persons that are incidental to a larger set of holistic case management services, these services do not meet the definition of housing counseling, as defined in [§ 5.100](#), and therefore are not required to be carried out in accordance with the certification requirements of [§ 5.111](#).

4.3.3 Landlord Incentives

Funds may be used to pay for Landlord Incentives that are reasonable and necessary to assist households in obtaining housing. Total funds used to pay the Landlord Incentives may not exceed three

times the rent charged for the unit. Grantees must maintain records that document that program costs are reasonable. Landlord Incentives can include:

- Signing bonuses (may not exceed 2 months of rent)
- Security deposits (may not exceed 3 months of rent)
- Costs to repair damages incurred by the participant not covered by the security deposit or that are incurred while the participant is still residing in the unit
- Extra cleaning or maintenance of a participant's unit or appliances

4.4 Additional Allowable Activities

Pursuant to the [ESG-CV Notice](#), the following additional activities are also allowable: Training, Hazard Pay, and Volunteer Incentives.

4.4.1 Training

Funds may be used to train staff on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to coronavirus among households who are homeless or at-risk of homelessness. The costs are eligible as a standalone activity, not as an administrative cost, and do not need to be tied to a specific intervention. Training costs are allowable under all ESG components and can be provided to both homelessness assistance providers and to those who do not receive funding through the CARES Act. Grantees must maintain meeting agendas and notes to support eligibility of this expense.

4.4.2 Hazard Pay

Funds may be used to pay Hazard Pay for grantee staff who work directly to prevent, prepare for, and respond to coronavirus among households who are homeless or at-risk of homelessness. Examples of staff working directly in support of coronavirus response include:

- Street Outreach teams
- Emergency Shelter staff
- Staff providing Essential Services (e.g., outpatient health or mental health, housing navigators)
- Staff working in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus

Hazard Pay may be billed under Rapid Re-Housing, Emergency Shelter, and Street Outreach program components. While grantees have the authority to establish their own Hazard Pay amounts and their cap, all grantees should ensure the following criteria are met:

- Description of staff receiving Hazard Pay and how their work is directly related to carrying out ESG-CV eligible costs
- Ensure Hazard Pay is reflective of established written compensation policies
- Demonstrate that the Hazard Pay is equitably allocated to all related activities
- Documentation that the Hazard Pay is reasonable
- Documentation indicates temporary pay increases that correspond with a period in which the staff person works directly to prevent, prepare for and respond to COVID.
- Grantees must maintain records that include job descriptions, policies and procedures or other program records that detail positions receiving Hazard Pay.

4.4.3 Volunteer Incentives

Funds may be used to provide reasonable incentives (e.g. cash) to volunteers who help to provide necessary Street Outreach, Emergency Shelter, Essential Services, and Housing Relocation and Stabilization Services during the pandemic. Volunteer Incentives may be billed under Rapid Re-Housing, Emergency Shelter, or Street Outreach. Program records should document that costs are reasonable. Grantees shall develop policies for Volunteer Incentives and ensure the following criteria are met:

- Define the term “volunteer” and who qualifies to receive Volunteer Incentives (e.g. those that provide necessary services during COVID)
- Type and amount of incentive provided
- Documentation of rationale to prove that the amount/type of incentive provided is reasonable and appropriate

4.5 Homeless Management Information System Activities

ESG-CV funds may be used to pay the costs of contributing data to the Homeless Management Information System (HMIS) designated by the Continuum of Care (CoC) for the area, including the costs of:

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, fax machines, and furniture
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying salaries for operating HMIS, including:
 - 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
- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
- Paying staff travel costs to conduct intake

If the grantee is a victim services provider or a legal services provider, it may establish and operate a comparable database that collects client-level data over time (i.e., longitudinal data) 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.

4.6 Administrative Activities

When ESG-CV funds are used for Administrative Expenses, County ESG-CV costs are limited to 10 percent and State ESG-CV costs are limited to 7% of the grantee’s ESG-CV award. Administrative Expenses are those related to the planning and execution of ESG-CV activities. This does not include staff and overhead costs directly related to carrying out activities eligible under Section 4, because those costs are eligible as part of those activities. Eligible Administrative Expenses include:

- **General Management, Oversight and Coordination:** Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:
 - Salaries, wages, and related costs of the grantee's staff engaged in program administration. In charging costs to this category, the grantee may either include the entire salary, wages, and related costs allocable to the program of each person whose primary responsibilities with regard to the program involve program administration assignments, or the pro rata share of the salary, wages, and related costs of each person whose job includes any program administration assignments. Program administration assignments include the following:
 - Preparing program budgets and schedules, and amendments to those budgets and schedules
 - Developing systems for assuring compliance with program requirements
 - Developing interagency agreements and agreements contractors to carry out program activities
 - Monitoring program activities for progress and compliance with program requirements
 - Preparing reports and other documents directly related to the program for submission to HUD
 - Coordinating the resolution of audit and monitoring findings
 - Evaluating program results against stated objectives
 - Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in this list
 - Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services
 - Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space

4.6.1 Indirect Costs

ESG-CV funds may be used to pay Indirect Costs in accordance with [2 CFR part 200](#), subpart E. Indirect Costs may be allocated to each eligible activity under Section 4, so long as that allocation is consistent with [2 CFR part 200](#), subpart E. The Indirect Costs charged to an activity subject to an expenditure limit under [§ 576.100](#) must be added to the direct costs charged for that activity when determining the total costs subject to the expenditure limit.

5. Service Standards

These Service Standards shall provide guidance for the implementation of all services and activities under all components. Grantees are responsible for ensuring all applicable Service Standards for their projects are followed.

5.1 Requirements for All Components

Households must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which ESG-CV funds are used – even though the grantee is required to offer such services for the duration of the participant’s enrollment in

the program. Program policies should not place a burden on persons accessing housing or shelter and maintaining their placement in the program.

5.1.1 Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

For the ESG-CV program, “covered housing provider,” as such term is used in HUD's regulations in [24 CFR part 5, subpart L](#), refers to:

- The grantee that administers the Rental Assistance for the purposes of [24 CFR 5.2005\(e\)](#)
- The housing owner for the purposes of [24 CFR 5.2005\(d\)\(1\)](#), [\(d\)\(3\)](#), and [\(d\)\(4\)](#) and [5.2009\(a\)](#)
- The housing owner and the grantee that administers the Rental Assistance for the purposes of [24 CFR 5.2005\(d\)\(2\)](#)
- The housing owner and the grantee that administers the Rental Assistance for the purposes of [24 CFR 5.2007](#). However, the County may limit documentation requests under [24 CFR 5.2007](#) to only the grantee, provided that:
 - This limitation is made clear in both the notice described under [24 CFR 5.2005\(a\)\(1\)](#) and the Rental Assistance Agreement
 - The entity designated to receive documentation requests determines whether the participant is entitled to protection under VAWA and immediately advise the participant of the determination
 - If the participant is entitled to protection, the entity designated to receive documentation requests must notify the owner in writing that the participant is entitled to protection under VAWA and work with the owner on the participant's behalf. Any further sharing or disclosure of the participant's information will be subject to the requirements in [24 CFR 5.2007](#).

5.1.2 Creating a Housing Stability Plan

Emergency Shelter and Rapid Re-Housing grantees must work with the participant to create a Housing Stability Plan. At a minimum, this plan should include a needs assessment (including mainstream and other resources), specific housing and self-sufficiency goals and action steps to retain permanent housing after assistance ends, taking into account all relevant considerations, such as the participant's current or expected income and expenses; other public or private assistance for which the participant will be eligible and likely to receive; and the relative affordability of available housing in the area. Developing a Housing Stability Plan is an optional activity for Street Outreach projects.

5.1.3 Conducting Lead-Based Paint Visual Assessments

A lead-based paint visual assessment must be completed for all units and shelters that meet the three following conditions:

1. The household moving into or remaining in their current unit is receiving ESG financial assistance **AND**
2. The unit was constructed prior to 1978 **AND**
3. A child under the age of six or a pregnant woman is, or will be, living in the unit.

A visual assessment must be conducted prior to providing ESG-CV financial assistance to the unit and on an annual basis thereafter (as long as assistance is provided). Visual assessments must be conducted by a HUD-Certified Visual Assessor and must be documented on the Housing Quality Standards or Housing Safety Standards and maintained in the participant file.

The lead-based paint visual assessment requirement exists to protect vulnerable families from potential health hazards. To prevent lead poisoning in young children, grantees must comply with the Lead-based Paint Poisoning Prevention Act of 1978 and its applicable regulations found at [24 CFR 35](#), Parts A, B, H, J, K, M, and R.

a. Exceptions to the Lead-Based Paint Visual Assessment Requirement

Visual assessments are not required under the following circumstances:

- Zero-bedroom or SRO-sized unit
- X-ray or laboratory testing of all painted surfaces by certified personnel has been conducted in accordance with HUD regulations and the unit is officially certified to not contain lead-based paint
- The property has had all lead-based paint identified and removed in accordance with HUD regulations
- The unit has already undergone a visual assessment within the past 12 months – obtained documentation that a visual assessment has been conducted
- It meets any of the other exemptions described in [24 CFR Part 35.115\(a\)](#).

If any of the conditions outlined above are met, grantees must include the information in the participant’s file.

5.2 Coordination Requirements for All Components

5.2.1 Coordinating Across Homeless Service Providers

Within Pierce County, coordination among homeless service providers occurs primarily through Coordinated Entry for housing assistance. Households experiencing a housing crisis in Pierce County are directed to use Coordinated Entry. Exceptions are made for participants engaging with Street Outreach or who are staying at Emergency Shelters; these households may be screened and served without first going through Coordinated Entry.

Given this context, grantees will be subject to the following coordination requirements:

- **Street Outreach**: Street Outreach providers must either provide mobile Coordinated Entry or connect participants to a Coordinated Entry access point, thus allowing for centralized assessment and for the needs of households to be met in a prioritized manner. As participants in Street Outreach are connected to other services and resources, Street Outreach providers should coordinate with other providers to ensure wrap-around services. Additionally, all Street Outreach providers should coordinate with one another, to ensure maximum coverage throughout Pierce County.
- **Emergency Shelter**: Shelter providers must either provide Coordinated Entry on-site or connect participants with a Coordinated Entry access point. Additionally, Shelter providers should coordinate with Rapid Re-housing, Permanent Supportive Housing, and Transitional Housing providers to ensure that shelter participants have access to services that can quickly re-stabilize their housing situation (i.e. link with permanent housing).
- **Rapid Re-Housing**: Grantees providing Rapid Re-Housing services must use Coordinated Entry to get referrals. In addition, the following requirements apply:

- Coordination with the Landlord Liaison Project (a program that builds relationships with landlords and keeps an inventory/database of affordable rental units) to assist in finding housing for participants.
- Coordinate with any other service providers engaged with the participant to ensure wrap-around services.

5.2.2 Coordinating Mainstream and Other Resources

Grantees must assist each participant, as needed, to obtain:

- Appropriate supportive services, including assistance in obtaining:
 - Permanent housing
 - Medical health treatment
 - Mental health treatment
 - Counseling
 - Supervision
 - Other services essential for achieving independent living
- Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including:
 - Medicaid
 - Supplemental Nutrition Assistance Program (SNAP)
 - Women, Infants and Children (WIC)
 - Federal-State Unemployment Insurance Program
 - Social Security Disability Insurance (SSDI)
 - Supplemental Security Income (SSI)
 - Child and Adult Care Food Program

Grantees should work with participants to identify needed mainstream or other resources and document the need for (and subsequent attainment of) the resource in the Housing Stability Plan.

5.3 Street Outreach Services

All Street Outreach providers are responsible for developing their own procedures that align with the policy in this section and describes how the project prevents, prepares for, and/or responds to coronavirus. At a minimum, these policies must be person-centered, trauma-informed, and follow Housing First principles.

The eligible activities identified in Section 3.1 are considered by HUD to be Street Outreach Essential Services. These services should be offered in a person-centered and trauma-informed way, with a focus on relationship building, such that the participant will more deeply engage in offered services, with the ultimate goal of ending their homeless crisis. As well, services should be targeted to those who are most likely to be disproportionately impacted by the effects of COVID-19.

Street Outreach providers should follow best practices regarding the safe delivery of services to unhoused persons, including minimizing the risk of spreading infectious diseases and ensuring their own personal safety, such as:

- Always let your supervisor(s) know your location
- Go in pairs whenever possible

- Don't approach people who are "giving signs" they don't want to be approached
- Don't interrupt sales of drugs or sex
- Trust your gut
- Never sneak up or corner someone
- Clearly identify yourself and your agency
- Receive training on how to protect yourself from COVID-19
- Greet participants from a distance of 6 feet and explain that you are taking additional precautions to protect yourself and the participants from COVID-19
- Provide masks to participants who do not have one
- Screen participants for symptoms by asking them if they feel as if they have a fever, cough, or other symptoms consistent with COVID-19
- Provide educational materials about COVID-19 for non-English speakers, those with low literacy or intellectual disabilities, and people who are hearing or vision impaired
- Identify and address potential language, cultural, and disability barriers associated with communicating COVID-19 information to workers, volunteers, and those you serve

For more information on Street Outreach best practices the [San Diego Homeless Outreach Worker Best Practices Guide](#) and [the Substance Abuse and Mental Health Services Administration \(SAMHSA\) Advisory: Behavioral Health Services for People Who Are Homeless](#) are both valuable resources.

5.4 Emergency Shelters Services

All Emergency Shelters are responsible for developing their own procedures that align with the Emergency Shelter Services policy in this section and describes how the project prevents, prepares for, and/or responds to coronavirus. This includes domestic violence service providers, which should also adhere to statewide standards for provision of services. At a minimum, these policies must be person-centered, trauma-informed, and follow Housing First principles.

No individual or family may be denied admission to or removed from the Emergency Shelter on the basis or as a direct result of the fact that the individual or family is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, if the individual or family otherwise qualifies for admission or occupancy¹.

Any Emergency Shelter that is considering closing or not accepting new guests must immediately notify the County, the public health authority, and emergency management officials.

5.4.1 Admission & Diversion

As indicated in Section 4.2, households with any homeless status may enter into an Emergency Shelter project. Emergency Shelter projects should manage the admission process in such a way that best fits their needs, based on their unique shelter location and target population. However, whenever practicable, Emergency Shelter project should attempt to divert entry into the shelter, if an alternate safe housing alternative can be identified. Domestic Violence shelters are exempt from this requirement, as the target population (by definition) has nowhere else to go.

¹ The terms "affiliated individual," "dating violence," "domestic violence," "sexual assault," and "stalking" are defined in [24 CFR 5.2003](#).

Emergency Shelters may not turn away eligible participants and must establish referral pathways to other shelter or housing if the shelter is at maximum capacity. Emergency Shelters must establish referral pathways to isolation and quarantine if a participant is in need of such services. Someone who presents at Emergency Shelter with respiratory symptoms (e.g., cough) should not be turned away solely because of their health symptoms.

Length of Stay Requirements

Emergency Shelter projects should seek to exit households to permanent housing as quickly as possible, ideally within 45 days or less. However, given the context of the current housing market, in conjunction with various eviction moratoria due to the pandemic, this may not be practicable. While there is no maximum stay requirement, Emergency Shelter is not a permanent housing option and all shelter guests should be seeking permanent housing solutions with the support of Emergency Shelter staff.

Emergency Shelters are strongly discouraged from implementing a maximum length of stay when a discharge will result in participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection.

Safety and Shelter Needs of Special Populations

For providers of Emergency Shelter for the Domestic Violence population, Pierce County defers to the safety best practices offered by the Violence Against Women Act (VAWA) and the Washington State Coalition Against Domestic Violence (WSCADV). DV Emergency Shelter providers must employ safety and shelter policies that align with VAWA and WSCADV guidelines and seek to protect the safety of those fleeing or attempting to flee domestic violence.

5.4.2 Referral

Emergency Shelter providers must either provide Coordinated Entry services on-site or connect its shelter guests to a Coordinated Entry access point, so that the household may be evaluated for a possible referral to a permanent housing project. Households in shelter are not required to complete a Coordinated Entry intake to remain in shelter. However, Emergency Shelter providers should encourage household participation in Coordinated Entry, as it provides access to additional housing resources and supports.

5.4.3 Discharge

Emergency Shelter providers must have policies in place describing the discharge or exiting procedure and shelter guests should be provided with this information at project entry. Emergency Shelter providers should seek to exit all households to permanent housing whenever possible.

5.4.4 Assessing, Prioritizing and Re-Assessing Need for Essential Services

All Emergency Shelters shall conduct assessments of their participants' needs for Essential Services (as defined in Section 3.2.1). For most shelters, this will occur at intake or shortly thereafter. Emergency Shelter staff should work with participants to identify and prioritize their needs. Unmet needs will be addressed either by the shelter or by other providers of Essential Services. Re-assessment should occur regularly (based on need), but no less than monthly.

5.4.5 Shelter Safety Standards

Any Emergency Shelter that receives assistance for Shelter Operations must also meet the following minimum safety, sanitation, and privacy standards:

- *Structure and materials.* The shelter building must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- *Access:* Shelters must be accessible in accordance with federal legislation and regulations associated with the Rehabilitation Act, Fair Housing Act, and Americans with Disabilities Act, where applicable.
- *Space and Security.* Except where the shelter is intended for day use only, the shelter must provide each participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- *Interior Air Quality.* Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- *Water Supply.* The shelter's water supply must be free from contamination.
- *Sanitary Facilities.* Each participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- *Thermal Environment.* The shelter must have any necessary heating/cooling facilities in proper operating condition.
- *Illumination and Electricity.* The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- *Food Preparation.* All food preparation areas (if any) must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- *Sanitary Conditions.* The shelter must be maintained in a sanitary condition.
- *Fire safety.* There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector, and there must be a second means of exiting the building in the event of fire or other emergency.

Pierce County will conduct a Housing Habitability Standards inspection of every shelter project no less than annually to verify all shelter safety standards are met. Habitability standards are not applicable for hotel/motel stays under 30 days.

5.5 Rapid Re-Housing Services

All Rapid Re-Housing providers are responsible for developing their own procedures that align with the policy in this section and describes how the project prevents, prepares for, and/or responds to coronavirus. This includes domestic violence service providers, which should also adhere to statewide standards for provision of services. The VAWA regulatory requirements under [24 CFR part 5, subpart L](#), apply to all eligibility and termination decisions that are made with respect to ESG-CV Rental Assistance. At a minimum, these policies must be person-centered, trauma-informed, and follow Housing First principles.

5.5.1 Rental Assistance

a. Tenant-Based Rental Assistance

All Rental Assistance provided with these funds must be Tenant-Based, meaning participants select a housing unit in which to live (within Pierce County) and receives Rental Assistance. Participants are eligible to receive Rental Assistance, as long as the participant continues to meet the program requirements and does not exceed the 12-month maximum.

b. Compliance with Rent Reasonableness

Rent Reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same time period for comparable units in the private unassisted market and must not be in excess of rents being charged by the owner during the same time period for comparable unassisted units.

To make this determination, the grantee should consider:

- The location, quality, size, type, and age of the unit; and
- Any amenities, housing services, maintenance, and utilities to be provided by the owner.

Comparable rents can be checked by using a market study, by reviewing comparable units advertised for rent, or with a note from the property owner verifying the comparability of charged rents to other units owned (for example, the landlord would document the rents paid in other units). NOTE: not every element in the suggested list of nine things to check for must be known to establish a comparable unit.

Once a unit is selected, grantees must perform a Rent Reasonableness determination. This determination must be made before any Rental Assistance can be provided for a unit and before entering into a Rental Assistance Agreement with a landlord. Participant files shall include a printout of at least three comparable unit rents, and evidence that these comparison units share the same features.

For purposes of calculating rent under this section, the rent shall equal the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities (excluding telephone) established by the public housing authority for the area in which the housing is located.

c. Lease Agreement

Each participant receiving Rental Assistance must have a legally binding, written lease for the rental unit, unless the assistance is solely for Rental Arrears. The lease must be between the owner and the participant. Where the assistance is solely for rental arrears, an oral agreement may be accepted in place of a written lease, if the agreement gives the participant an enforceable leasehold interest under state law and the agreement and rent owed are sufficiently documented by the owner's financial records, rent ledgers, or canceled checks.

The lease must not limit the condition of the occupancy to receipt of Rental Assistance from the grantee. As well, each lease must include a lease provision or incorporate a lease addendum that includes all requirements that apply to tenants, the owner or lease under [24 CFR part 5, subpart L](#) (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), as supplemented by [24 CFR 576.409](#), including the prohibited bases for eviction and restrictions on construing lease terms under [24 CFR 5.2005\(b\)](#) and [\(c\)](#). If the housing is not assisted under another "covered housing program," as defined in [24 CFR 5.2003](#), the lease provision or lease addendum may be written to expire at the end of the Rental Assistance period.

d. Rental Assistance Agreement

Grantees must have a Rental Assistance Agreement in place with the owner of the unit in order to issue payment. The Rental Assistance Agreement must set forth the terms under which the grantee will provide Rental Assistance for the participant's unit and must contain the same payment due date, grace period, and late payment penalty requirements as the lease between the landlord and the participant. The grantee must make timely payments to each owner in accordance with the Rental Assistance Agreement. The grantee is solely responsible for paying late payment penalties that it incurs with non-ESG-CV funds.

The Rental Assistance Agreement must provide that, during the term of the agreement, the owner must give the grantee a copy of any notice to the participant to vacate the housing unit, or any complaint used under State or local law to commence an eviction action against the participant.

The Rental Assistance Agreement must include all protections that apply to tenants and applicants under [24 CFR part 5, subpart L](#), as supplemented by [§ 576.409](#), except for the Emergency Transfer Plan requirements under [24 CFR 5.2005\(e\)](#) and [576.409\(d\)](#). If the housing is not assisted under another "covered housing program," as defined in [24 CFR 5.2003](#), the agreement may provide that the owner's obligations under [24 CFR part 5, subpart L](#) (Protection for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking), expire at the end of the rental assistance period.

The Rental Assistance Agreement with the owner must terminate and no further Rental Assistance payments under that agreement may be made if any of the following apply:

- The participant moves out of the housing unit for which the participant has a lease.
- The lease terminates and is not renewed.
- The participant becomes ineligible to receive ESG-CV Rental Assistance.

e. Determining Duration of Rental Assistance

The duration of Rental Assistance provided to participants (i.e. the number of months) will be determined in partnership with the participant(s) individually, based on the needs of the household. Given that circumstances are subject to frequent changes, grantees should work with participants monthly to re-assess the most appropriate length of Rental Assistance to ensure household stability. Re-assessments should be documented in the Housing Stability Plan.

f. Determining Participant Share of Rent

Rental Assistance is to be individualized and based on participant need. Rental Assistance can include 100% coverage of the first month rent, and, if applicable, a one-time payment of up to six months of Rental Arrears. Financial Assistance may also cover the remainder of move-in costs (See Section 5.5.3.a. for more details).

Grantees should work with their participants to collaboratively determine an individualized amount that each household will contribute toward their monthly rent, based on their income. This amount needs to be clearly documented and includes a utility allowance if they pay for utilities directly. The actual contribution will be determined monthly, based on each household's specific situation and financial resources.

A one-time payment of up to six months rental arrears may also be provided. However, if a household is more than two months in arrears, grantees should attempt to negotiate a payment plan and/or identify other community resources to assist the household.

g. Notification Requirements under VAWA

As provided under [24 CFR 5.2005\(a\)](#) each grantee that administers ESG-CV Rental Assistance is responsible for ensuring that the notice and certification form described under [24 CFR 5.2005\(a\)\(1\)](#) is provided to each participant receiving ESG-CV Rental Assistance at each of the following times:

- When a participant is denied Rental Assistance
- When a participant begins receiving Rental Assistance
- When a participant is notified of termination of Rental Assistance
- When a participant receives notification of eviction

h. Emergency Transfer Plan

Grantees must develop an Emergency Transfer Plan under [24 CFR 5.2005\(e\)](#). Once the applicable plan is developed in accordance with this section, grantees must implement the plan in accordance with [24 CFR 5.2005\(e\)](#).

Each Emergency Transfer Plan must meet the requirements in [24 CFR 5.2005\(e\)](#) and must specify what will happen with respect to the non-transferring family member(s), if the family separates in order to effect an emergency transfer (bifurcation).

For the purposes of this part, the following requirements shall apply in place of the requirements at [24 CFR 5.2009\(b\)](#):

- When a family receiving tenant-based rental assistance separates under [24 CFR 5.2009\(a\)](#), the family's tenant-based Rental Assistance and Utility Assistance, if any, shall continue for the family member(s) who are not evicted or removed.

5.5.2 Unit Housing Inspections & Standards

In addition to the household being eligible, the unit must also meet certain habitability requirements. Grantees are required to request a HUD Housing Quality Standards (HQS) inspection from Pierce County² for all permanent housing units for participants, prior to move-in. The unit must pass the HQS inspection before rent is paid and should be documented in the participant file.

5.5.3 Housing Stabilization and Relocation Services

The following policies apply when determining the type, amount, and duration of Housing Stabilization and Relocation services to participants.

a. Financial Assistance

Financial Assistance includes Application Fees, Security Deposit, Last Month's Rent, Utility Deposit, Utility Payments (including up to six months of Utility Arrears), Moving Costs and Emergency Transfers. The level of Financial Assistance should be based on the income and need of the household as well as their ability to contribute to the cost of housing. All participants receiving Financial Assistance will receive Housing Stability Case Management for the duration of the period of assistance. Financial Assistance may cover up to 100% of eligible move-in costs.

² All Pierce County HQS Inspectors are certified.

i. Determining Participant Share of Utilities

Grantees shall work with their participants to determine an individualized amount that each household will contribute toward their utilities based on their income. The actual contribution will be determined monthly, based on each household’s specific situation and financial resources.

Grantees will help households obtain outside Utility Assistance if they are unable to pay for the utilities themselves (i.e. no income). In rare cases where the household is unable to locate other Utility Assistance, ESG-CV funds can be used if the household demonstrates a clear need for assistance (i.e. utility shut-off notice, monthly budget indicating the inability to pay utilities, etc., and a list of community resources they attempted to obtain). If funds are used, the payment should take into consideration the previous Utility Allowance given to the household in the participant contribution calculation for rent.

Up to six months of payment toward utility arrears may be provided. If a household is more than two (2) months in arrears, grantees should attempt to negotiate a payment plan and/or identify other community resources to assist the household.

Utility Assistance may only be provided if the participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments. Utility Assistance is limited to 12 months, including any arrears. Any partial month payments shall be considered one month.

b. Housing Stability Case Management

Housing Stability Case Management shall focus on housing stability for a participant who resides in permanent housing. Alternatively, Housing Stability Case Management may also be used to assist a participant in overcoming immediate barriers to obtaining housing. However, during the period the participant is seeking permanent housing, the Housing Stability Case Management assistance cannot exceed 30 days. When the participant is living in permanent housing, assistance cannot exceed 24 months.

Housing Stability Case Management must include the development of an individualized Housing Stability Plan. The frequency of meetings, duration of services and type of assistance provided by the Case Manager shall be tailored to the specific needs of the participant, but will occur no less than monthly. Reassessment of eligibility and need for services will occur at least annually.

6. Conflicts of Interest

Grantees must avoid any conflict of interest in carrying out activities funded by the ESG-CV program and must maintain written standards of conduct covering organizational conflicts of interest required under [2 CFR 200.318](#).

6.1 Organizational Conflicts of Interest

The provision of any type or amount of ESG-CV assistance may not be conditioned on an individual’s or family’s acceptance or occupancy of Emergency Shelter or housing owned by the grantee or a parent or subsidiary of the grantee.

6.2 Individual Conflicts of Interest

For procurement of goods and services, grantees must comply with [2 CFR 200.318](#). For all other transactions and activities (including all grantee contractors):

- Conflict-of-interest provisions of this policy apply to any person who is an employee, agent, consultant, officer, or elected or appointed officials of the grantee.
- No person (as described above) who exercises or has exercised any functions or responsibilities with respect to activities assisted under the ESG-CV program, or who is in a position to participate in a decision-making process or gain inside information with regard to activities assisted under the program, may obtain a financial interest or benefit from an assisted activity; have a financial interest in any contract, subcontract, or agreement with respect to an assisted activity; or have a financial interest in the proceeds derived from an assisted activity, either for him or herself or for those with whom he or she has family or business ties, during his or her tenure or during the one-year period following his or her tenure.

6.3 Exceptions

HUD may grant an exception to the provisions of this subsection on a case-by-case basis, taking into account the cumulative effects of the criteria in HUD’s Factors to be Considered for Exceptions ([24 CFR 576.404\(b\)\(3\)\(ii\)](#)), provided that the County has satisfactorily met the threshold requirements. To seek an exception, contact the County in writing, to discuss whether your agency/situation may be eligible. For more information on HUD’s Conflict of Interest policy, please see [24 CFR 576.404](#).

7. Compliance with HUD Data Standards

All grantees shall collect data on participants receiving ESG-CV assistance and enter it into the HMIS run by the CoC. Data collection must in accordance with the most current [HUD HMIS Data Standards](#) and the [ESG Program HMIS Manual](#).

7.1 Data Collection in the HMIS

Projects are required to provide quality data to the best of their ability. Maintaining good data quality is important for effective program evaluation. Data quality has four elements: completeness, timeliness, accuracy, and consistency.

7.1.1 Data Completeness

Completeness of data is measured by the percentage of incomplete fields in required data elements. Agencies are expected to collect first name, last name, date of birth, race, and ethnicity from participants that give consent on the HMIS consent form. Agencies will never require a participant to provide this information even if they have consented but should gather it to the best of their ability. All participant, consenting and non-consenting, must have complete prior living situation and exit destination data.

7.1.2 Data Timeliness

Participant data should be entered into HMIS as close to the date of collection as possible. Entering data as soon as possible supports data quality by avoiding backlogs of pending data and allowing near real time analysis and reporting. Projects must enter/update project participant /household data in HMIS within five business days following the date of project enrollment/exit.

7.1.3 Data Accuracy

Data entered into HMIS must reflect the real situation of the participant/household as closely as possible. Accurate data is necessary to ensure any project reporting fairly represents the work of the project and each participant’s story. Examples of data accuracy:

Elements of Data Accuracy	
Date of Birth and Project Start Date	Ensure the two are not the same dates.
<ul style="list-style-type: none"> • Prior Living Situation • Length of Stay in Prior Living Situation • Approximate Date Homelessness Started • Number of Times the Client has Experienced Homelessness in the Last 3 Years • Number of Months Experiencing Homelessness in the Last 3 Years 	Ensure responses for these items do not conflict with each other.
Disabling Condition	Ensure the Yes/No answer does not conflict with the specific types of disabling conditions.
Health Insurance	Ensure the Yes/No answer does not conflict with the specific types of health insurance.
Monthly Income	Ensure the Yes/No answer does not conflict with the specific sources of monthly income.
Non-Cash Benefits	Ensure the Yes/No answer does not conflict with the specific sources of non-case benefits.
Relationship to Head of Household	Ensure there is only one Head of Household for every Household (including participants served as individuals) and that this data element is accurate for all household members.
Veteran Status	Ensure individuals under 18 years of age are not identified as veterans.
Project Population Specifics	<p>Ensure that projects serving individuals only enroll individuals and not multi-person households.</p> <p>Ensure that projects serving families with children only enroll families with children.</p> <p>Ensure that projects only serving participants of a specific age range only enroll participants of that age range.</p>

7.1.4 Data Consistency

Consistent data helps ensure that any reporting generated by a project is understood. Data consistency is important for effectively communicating the processes and outcomes of a project. All data will be collected, entered, and stored in accordance with the Agency Partner Agreement. All data elements and responses will be entered per the [HUD HMIS Data Standards Manual](#).

To avoid inconsistency, agencies should use language on intake forms that closely matches the elements and responses in HMIS. Participants who refuse consent must be made anonymous per Pierce County and Department of Commerce Guidance.

7.2 Consent for Entry of Personally Identifying Information

7.2.1 Identified Records

Personally Identifying Information (PII)³ must not be entered into HMIS unless all adult household members have provided informed consent. Informed consent must be documented with a signed copy of the [Client Release of Information and Informed Consent form](#) in the participant file. If electronic consent has been received, a copy does not need to be printed for the participant file but must be available in HMIS. If telephonic consent has been received, complete the consent form the first time the household is seen in person.

7.2.2 Anonymous Records

The following types of records must be entered anonymously:

- Households in which one adult member does not provide informed consent for themselves or their dependents
- Households entering a domestic violence program or currently fleeing or in danger from a domestic violence, dating violence, sexual assault, human trafficking or a stalking situation
- Minors under the age of 13 with no parent or guardian available to consent to the minor's information in HMIS
- Households in programs which are required by funders to report HIV/AIDS status

If the reporting of the HIV/AIDS status of participants is not specifically required, the HIV/AIDS status must not be entered in HMIS. If a combination of race, ethnicity, gender, or other demographic data could be identifying in the community, those data should not be entered for anonymous records.

8. Termination of Participation, Denial and Appeals

Grantees must have written termination, denial, and appeal policies and/or procedures. The policies and/or procedures should be readily available to participants upon entry into the program. It is important to effectively communicate these policies and/or procedures to households and ensure that they are fully understood.

Additionally, the core statutory protections of the Violence Against Women Act (VAWA) that prohibit denial or termination of assistance or eviction solely because an applicant or tenant is a victim of domestic violence, dating violence, sexual assault, or stalking apply.

8.1 Termination of Participation and Denial of Assistance

All participants have due process rights if facing program termination. Termination and denial procedures must include:

- Written notice to the household containing a clear statement of the reasons for termination/denial
- A review of the decision, in which the household 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/denial decision. This may include the household's right to question or confront staff involved; and
- Prompt written notice of the final decision to the household.

³ PII includes names, social security number, birth date, address, phone number, email, and photo.

If a participant violates program requirements, the grantee may terminate the assistance in accordance with a formal process established by the grantee that recognizes the rights of individuals affected.

Grantees must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a participant's assistance is terminated only in the most severe cases. Causes for termination may include, but are not limited to, failure to abide by any agreed-upon requirements and participant fraud. Termination does not bar the grantee from providing further assistance at a later date to the same household.

Causes of denial of assistance include, but are not limited to, the household's ineligibility or failure to provide verifiable evidence of eligibility.

8.2 Appeal Process

The appeal process shall provide a fair and impartial due process for participants that believe they have been unjustly terminated from or denied program assistance. Participants may contest and appeal any decision that denies (for any reason), limits eligibility of participant or terminates or modifies levels of assistance. The appeal process will be triggered by a written appeal or verbal via telephone following the notification of service termination or denial of service by the grantee to the participant.

Appeal procedures must include:

- Written description of the appeal from the participant including any documentation demonstrating that they should not be termination/denied assistance. Such information can be taken via telephone if necessary.
- Review of the appeal before a person other than the person (or a subordinate of that person) who made or approved the termination/denial decision.
- Prompt written notification of the decision to the household.

The appeal process shall be communicated to each participant at program entry, and a copy of the procedures shall be provided for their reference. A signed acknowledgement of the grievance and appeal process is included in each participant record.

9. Documentation

Grantees must have policies and procedures to ensure the requirements of this section are met, including those required by [2 CFR part 200](#). The policies and procedures must be established in writing and implemented by the grantee to ensure that ESG-CV funds are used in accordance with the requirements. In addition, sufficient records must be established and maintained to enable the County and HUD to determine whether ESG-CV requirements are being met.

9.1 Documenting Homeless Status

Grantees must maintain and follow written intake procedures to ensure compliance with the HUD Homeless definition in [24 CFR 576.2](#). Documentation of the evidence relied upon to establish and verify homeless status must be collected at intake and follow the order of priority for obtaining evidence as indicated in Section 6.1.1 below.

However, lack of third-party documentation must not prevent an individual or family from being immediately admitted to Emergency Shelter, receiving Street Outreach services, or being immediately admitted to Shelter or receiving services provided by a Victim Service Provider.

Records contained in an HMIS or comparable database used by Victim Service or Legal Service Providers are acceptable evidence of third-party documentation. Intake worker observations are also acceptable, if the HMIS retains an auditable history of all entries, including the person who entered the data, the date of entry, and the change made and if the HMIS prevents overrides or changes of the dates on which entries are made.

9.1.1 Preferred Order of Documentation Type

Grantees should use the following methods to document homeless status, listed in HUD's preferred order:

- 1) Third-Party Verification
 - a) Written
 - b) Oral
- 2) Intake Staff Observations
- 3) Self-Certification

In general, grantees should always seek third-party verification first. If third-party verification cannot be obtained, grantees should document the efforts taken to obtain third-party verification and move on to intake staff observation. Likewise, if intake staff observation cannot be obtained, efforts to obtain such observation should be documented, and staff should move on to participant self-certification. This practice applies to all components and categories, unless otherwise noted.

9.1.2 Documentation Standards for Homeless Categories

Category 1 – Literally Homeless

If the participant qualifies as homeless under paragraph (1)(i) (a place not designed for regular sleeping accommodation) or (ii) (publicly or privately operated Emergency Shelter) of the homeless definition in [§ 576.2](#), acceptable evidence includes a written observation by an Outreach worker of the conditions where the individual or family was living, a written referral by another housing or service provider, or a certification by the individual or head of household seeking assistance.

If the participant qualifies as homeless under paragraph (1)(iii) of the homeless definition [§ 576.2](#), because he or she resided in an Emergency Shelter or place not meant for human habitation and is exiting an institution where he or she resided for 90 days or less, acceptable evidence includes the evidence described in the previous paragraph AND one of the following:

- Discharge paperwork or a written or oral referral from a social worker, case manager, or other appropriate official of the institution, stating the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker; or
- If such discharge paperwork is not obtainable, a written record of the intake worker's due diligence in attempting to obtain the evidence described in the above bullet and a certification by the individual seeking assistance that states he or she is exiting or has just exited an institution where he or she resided for 90 days or less.

Category 2 – Imminent Risk of Homelessness

If the participant qualifies as homeless under paragraph (2) of the homeless definition in [§ 576.2](#), because the individual or family will imminently lose their housing, the evidence must document all three of the following conditions:

1. Housing Loss Within 14 Days

- **If participant is a tenant or homeowner:**
 - A court order resulting from an eviction action that requires the individual or family to leave their residence within 14 days after the date of their application for homeless assistance; or the equivalent notice under applicable state law, a Notice to Quit, or a Notice to Terminate issued under state law
- **If participant is in hotel/motel not paid for by charitable organizations or government programs:**
 - Evidence that the individual or family lacks the resources necessary to reside there for more than 14 days after the date of application for homeless assistance (e.g. bank statements showing funds available)
- **If participant is in another housing situation (i.e. doubled up with other tenants):**
 - An oral statement by the individual or head of household that the owner or renter of the housing in which they currently reside will not allow them to stay for more than 14 days after the date of application for homeless assistance.
 - The intake worker must record the statement and certify that it was found credible. To be found credible, the oral statement must either:
 - Be verified by the owner or renter of the housing in which the individual or family resides at the time of application for homeless assistance and documented by a written certification by the owner or renter or by the intake worker's recording of the owner or renter's oral statement; or
 - If the intake worker is unable to contact the owner or renter, be documented by a written certification by the intake worker of his or her due diligence in attempting to obtain the owner or renter's verification and the written certification by the individual or head of household seeking assistance that his or her statement was true and complete

2. No Subsequent Residence

- Appropriate documentation includes self-certification, supported by other documentation when practical
- Self-certification alone is adequate, but standardized assessment form is recommended to document that this condition is met

3. Lack of Resources & Support Networks to Obtain Other Permanent Housing

- Appropriate documentation includes self-certification, supported by other documentation when practical
- Self-certification alone is adequate, but standardized assessment form is recommended to document that this condition is met

Category 3 – Homeless Under Other Federal Statutes

If the participant qualifies as homeless under paragraph (3) of the homeless definition in [§ 576.2](#), because the individual or family does not otherwise qualify as homeless under the homeless definition but is an unaccompanied youth under 25 years of age, or homeless family with one or more children or youth, and is defined as homeless under another Federal statute or section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), the evidence must document all four of the following conditions:

1. Defined as Homeless Under Other Federal Statutes
 - Verification of homeless status must be from the agency administering the federal program.
 - Eligible programs include: the Runaway and Homeless Youth Act, the Head Start Act, subtitle N of the Violence Against Women Act of 1994, section 330 of the Public Health Service Act, the Food and Nutrition Act of 2008, section 17 of the Child Nutrition Act of 1966, or subtitle B of title VII of the McKinney-Vento Homeless Assistance Act.

2. No Lease, Ownership Interest, or Occupancy Agreement in Permanent Housing during the Preceding 60 Days
 - Referral by a housing or service provider, written observation by an outreach worker, or certification by the homeless individual or head of household seeking assistance.

3. Persistent Instability (two or more moves during preceding 60 days)
 - Certification by the individual or head of household and any available supporting documentation that the individual or family moved two or more times during the 60-day period immediately preceding the date of application for homeless assistance, including:
 - Recorded statements or records obtained from each owner or renter of housing, provider of shelter or housing, or social worker, case worker, or other appropriate official of a hospital or institution in which the individual or family resided; or
 - Where these statements or records are unobtainable, a written record of the intake worker's due diligence in attempting to obtain these statements or records.
 - Where a move was due to the individual or family fleeing domestic violence, dating violence, sexual assault, or stalking, then the intake worker may alternatively obtain a written certification from the individual or head of household seeking assistance that they were fleeing that situation and that they resided at that address.

4. Expected to Retain Status for Extended Period due to Special Needs or Two or More Employment Barriers
 - **If participant has special needs:**
 - Appropriate documentation is third party written verification only
 - Written diagnosis from a professional licensed by the state to diagnose and treat the condition is required
 - If the condition is observable, staff observation is an acceptable form of documentation, as long as written diagnosis from licensed professional is obtained within 45 days
 - **If participant has two or more employment barriers:**
 - Appropriate documentation is third party written or oral verification
 - Third party written examples include:
 - Employment records
 - Department of correction records
 - Literacy, English proficiency tests
 - Self-certification is not acceptable

Category 4 – Fleeing/Attempting to Flee Domestic Violence

If the individual or family qualifies under paragraph (4) of the homeless definition in [§ 576.2](#), because the individual or family is fleeing domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions related to violence, then acceptable evidence includes an oral

statement by the individual or head of household seeking assistance that they are fleeing that situation, that no subsequent residence has been identified and that they lack the resources or support networks (e.g., family, friends, faith-based or other social networks), needed to obtain other housing.

If the individual or family is receiving shelter or services provided by a victim service provider, the oral statement must be documented by either a certification by the individual or head of household or a certification by the intake worker. Otherwise, the oral statement that the individual or head of household seeking assistance has not identified a subsequent residence and lacks the resources or support networks (e.g., family, friends, faith-based or other social networks, needed to obtain housing) must be documented by a certification by the individual or head of household that the oral statement is true and complete, and, where the safety of the individual or family would not be jeopardized, the domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening condition must be verified by a written observation by the intake worker or a written referral by a housing or service provider, social worker, legal assistance provider, health-care provider, law enforcement agency, legal assistance provider, pastoral counselor, or any other organization from whom the individual or head of household has sought assistance for domestic violence, dating violence, sexual assault, or stalking. The written referral or observation need only include the minimum amount of information necessary to document that the individual or family is fleeing, or attempting to flee domestic violence, dating violence, sexual assault, and stalking.

9.2 Income Documentation Standards

Income documentation is not required for initial certification of Rapid Re-Housing participants but must occur during recertification.

9.2.1 Definition

Income is money that is paid to, or on behalf of, the head of household or spouse (even if temporarily absent) or to any other household member 18 years or older. (Victims fleeing domestic violence do not have to report the abuser's income.) Income includes the current (not projected) gross income (annualized) of all adult (18 years and older) household members and unearned income paid to an adult attributable to a minor.

Sources of Income and Examples of Acceptable Documentation

- **Earned Income:** Payment statement (pay advice), statement of income from employer
- **Self-employment/Business Income:** Most recent financial statement
- **Interest and Dividend Income:** Most recent interest or dividend income statement
- **Pension/Retirement Income:** Most recent benefit notice, pension statement, or other payment statement from pension provider
- **Armed Forces Income:** Payment statement (pay advice/pay stub), statement of income from a government official or agency
- **Unemployment and Disability Income:** Most recent benefit or disability income notice from SSI, statement from SSI
- **Public Assistance, including TANF:** Most recent benefit or income notice from public assistance administrator, statement from public assistance administrator
- **Alimony and Child Support:** Court order, cancelled checks
- **No Income Reported:** Self-certification

Exclusions

- Income of children (under 18)
- Inheritance and insurance income
- Medical expense reimbursement
- Income of live-in aides
- Certain state payments regarding disability
- Student financial aid
- Armed Forces Hostile Fire pay

9.2.2 Annualizing Wages and Periodic Payments

When calculating income based on hourly, weekly, or monthly payment information, add the gross amount earned in each payment period that is documented and divide by the number of payment periods. This provides an average wage per payment period. Depending on pay periods used by the employer or the schedule of periodic payments, the following calculations convert the average wage into annual income:

- Hourly Wage multiplied by Hours Worked per Week multiplied by 52 weeks
- Weekly Wage multiplied by 52 weeks
- Bi-Weekly (every other week) Wage multiplied by 26 bi-weekly periods
- Semi-Monthly Wage (twice a month) multiplied by 24 semi-monthly periods
- Monthly Wage multiplied by 12 months

The definition of income reflects a household's income at the time they are seeking assistance. Accordingly, documents and information collected to verify income should be recent. Documentation dated within 30 days is acceptable. However, for public assistance benefits, (e.g., SSI, food stamps), a benefits statement received any time within the twelve months prior to the time of application and reflecting current benefits received by a household is allowed. A copy of a recent bank statement indicating direct deposit is also acceptable.

9.2.3 Documentation Types in Order of Preference

1. Source documents for the assets held by the participant and income received over the most recent period for which representative data is available before the date of the evaluation (e.g., wage statement, unemployment compensation statement, public benefits statement, bank statement)
2. To the extent that source documents are unobtainable, a written statement by the relevant third party (e.g., employer, government benefits administrator) or the written certification by grantee's intake staff of the oral verification by the relevant third party of the income the participant received over the most recent period for which representative data is available
3. To the extent that source documents and third party verification are unobtainable, the written certification by the participant of the amount of income the participant received for the most recent period representative of the income that the participant is reasonably expected to receive over the 3-month period following the evaluation.

9.4 Documentation Requirements for Participant Records

In addition to evidence of homeless status, records must be kept for each participant that document:

- Determination of eligibility as described in Section 3.4 and re-evaluation of eligibility as described in Section 3.5

- Compliance with the applicable requirements for providing services and assistance to that participant under the program components and eligible activities provisions in Section 4, as applicable, including:
 - Landlord Incentives (Section 4.4.2):
 - Costs are reasonable and appropriate
 - Costs are allowable and necessary to obtain housing for households experiencing homelessness
 - Total amount for all incentives combined does NOT exceed three times the rent charged for the unit
 - Volunteer Incentives (Section 4.4.3):
 - Defining who qualifies to receive Volunteer Incentives
 - Type and amount of incentive provided
 - Rationale to prove the amount/type of incentive provided is reasonable and appropriate
- Determination for the amount and type of assistance provided, as described in Section 5, as applicable, including:
 - The provision of applicable services as described in Sections 5.1 (Connecting to Mainstream and Other Resources) and 5.2 (Utilization of Coordinated Entry)
 - The services and assistance provided to that participant, including, as applicable, any Rental Assistance (Section 5.5.1) or Financial Assistance (Section 5.5.3) paid on behalf of the participant, including:
 - Copies of all leases and Rental Assistance Agreements for the provision of Rental Assistance
 - Payments made to owners for the provision of Rental Assistance
 - Any supporting documentation of payments, including dates of occupancy by participants
 - Documentation of monthly Utility Allowance used to determine compliance with rent restriction
 - Demonstrating Rental Assistance is reasonable through a Rent Reasonableness study (Section 5.5.1.b.)
 - Participant files shall include a printout of at least three comparable unit rents, and evidence that these comparison units share the same features
 - Determination of duration of Rental Assistance in the Housing Stability Plan (Section 5.5.1.3)
 - Satisfaction of applicable Habitability Standards, including either:
 - A compliant Housing Habitability Standards inspection report for any shelter unit (Section 5.4.5)
 - A compliant Housing Quality Standards inspection report for any unit for which Rental Assistance is provided (Section 5.5.2)
- Where applicable, compliance with the termination of assistance requirement in Section 8

9.4.1 Confidentiality of Participant Records

Grantees must develop and implement written procedures to ensure:

- All records containing personally identifying information (as defined in HUD's standards for participation, data collection, and reporting in a local HMIS) of any individual or family who applies for and/or receives ESG-CV assistance will be kept secure and confidential
- The address or location of any domestic violence, dating violence, sexual assault, or stalking shelter project assisted under the ESG will not be made public, except with written authorization of the person responsible for the operation of the shelter
- The address or location of any housing of a participant will not be made public, except as provided under a pre-existing privacy policy of grantee and consistent with State and local laws regarding privacy and obligations of confidentiality

Grantees must have policies and/or procedures to ensure that participant records are maintained in a confidential manner and keep written records or files pertaining to households under lock and key with designated personnel granted access to those files.

9.4.2 Period of Record Retention

All records pertaining to each fiscal year of ESG funds must be retained for the greater of 5 years or the period specified below. Copies made by microfilming, photocopying, or similar methods may be substituted for the original records.

- Documentation of each participant's qualification as a homeless family or individual and other participant records must be retained for 5 years after the expenditure of all funds from the grant under which the participant was served

Notwithstanding the confidentiality procedures established in Section 6.3.1, the grantee must comply with the requirements for access to records in [2 CFR 200.336](#).

9.5 Other Documentation Requirements

The grantee must also keep the following records:

- Documentation of compliance with the organizational conflicts-of-interest requirements in Section 7.1
- Copy of the personal conflicts of interest policy or codes of conduct developed and implemented to comply with the requirements in Section 7.2,
- Documentation supporting exceptions to the personal conflicts of interest prohibitions (Section 7.3)
- Compliance with the faith-based activities requirement in [24 CFR 5.109](#)
- Compliance with the Federal requirements in [24 CFR 576.407](#) and [24 CFR 576.409](#), as applicable, including:
 - Records demonstrating compliance with the nondiscrimination and equal opportunity requirements under [§ 576.407\(a\)](#) and the affirmative outreach requirements in [§ 576.407\(b\)](#), including:
 - Data concerning race, ethnicity, disability status, sex, and family characteristics of persons and households who are applicants for, or program participants in, any program or activity funded in whole or in part with ESG funds; and
 - Records demonstrating compliance with the uniform administrative requirements in [2 CFR part 200](#).

- Records demonstrating compliance with the environmental review requirements, including flood insurance requirements.
- Certifications and disclosure forms required under the lobbying and disclosure requirements in [24 CFR part 87](#).
- Data on emergency transfers requested under [§ 576.409](#), pertaining to victims of domestic violence, dating violence, sexual assault, or stalking, including data on the outcomes of such requests.
- Documentation showing that ESG-CV grant funds were spent on allowable costs in accordance with the requirements for eligible activities under Section 4, financial management in [2 CFR 200.302](#), and the cost principles in [2 CFR part 200](#), subpart E