



FL-515 Continuum of Care (CoC) Written Standards **ESG**

Revision: July, 2023

Purpose:

Continuums of Care are required by HUD to establish and operate a “centralized or coordinated assessment system”, referred to as Coordinated Entry. The goal of Coordinated Entry (CE) is to increase the efficiency of local crisis response systems and improve fairness and ease of access to resources, including mainstream resources. Coordinated Entry is intended to help communities prioritize people who are most in need of assistance, provide information to stakeholders about service needs and gaps to help communities strategically allocate their current resources and identify the need for additional resources. Additional requirements are set forth in HUD Notice CPD-17-01, as authorized under 24 CFR 578.7(a), 24 CFR 576.400(d), 24 CFR 576.400(e), and the HEARTH Act. There are multiple points of entry to the CES and in consultation with ESG grant recipients, the CoC determines those with highest immediate needs, so that they can be assisted first. As the NWFL CoC is the only entity to receive ESG funding in our six-county area, the CES is accessible in all counties and individuals are prioritized regardless of location within the geographic designation of the CoC.

Subrecipients agree to accept clients referred through the CES for the following programs:

ELIGIBLE ESG PROGRAM COMPONENTS:

1. Rapid Rehousing
2. Homeless Prevention
3. Emergency Shelter
4. Street Outreach
5. HMIS

Client Eligibility:

Verification of Homeless status eligibility: Documentation will need to be supplied or collected based upon the following: 1) Third party documentation, 2) Observation by the intake worker, 3) self-declaration from the individual or family seeking assistance

Acceptable evidence of third-party documentation includes records contained in HMIS database; comparable database used by victim service; written observations by an outreach worker of the conditions where the individual or family was living at time of engagement; referral from a public shelter; discharge paperwork or written/oral referral from an appropriate official of an institution including the beginning and end dates of the time residing in the institution. All oral statements must be recorded by the intake worker.

Annual income is used to determine program eligibility and the level of assistance the household will receive. To determine the annual income of an individual or family household, CoC regulation requires the use of calculating income standards under 24 CFR 5.609. The annual income definition found at 24 CFR Part 5 is used



by a variety of federal programs including Housing Choice Voucher (Section 8), Public Housing, and the Low-Income Housing Tax Credit Program.

Homeless as defined in 24 CFR 576.2 means:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) 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;
 - (ii) 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
 - (iii) An individual who is exiting an institution where he or she resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith based or other social networks, needed to obtain other permanent housing;
- (3) 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:
 - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (2 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;
 - (iii) Have experienced persistent instability as measured by two moves or more during the 60- day period immediately preceding the date of applying for homeless assistance; and
 - (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or
- (4) Any individual or family who:



- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence;
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

Program Components:

➤ **Rapid Re-Housing (RRH)**

The NWFL CoC Rapid Rehousing Program is designed to provide low-barrier, equal access to RRH services which assist homeless individuals locate, secure and successfully move to permanent housing. If clients require more than 6 months of assistance, Permanent Supportive Housing (PSH) such as HUD VASH, Section 8, Income Based Tax Credit Properties, etc. must be considered. Rent reasonableness and evidence of Fair Market Value rent must also be documented. RRH may be used as a temporary housing solution for those awaiting PSH. All NWFL CoC RRH projects adhere to Housing First principles and will serve all clients in need of services who are presented through the Coordinated Entry System (CES) who are prioritized for services using a standardized pre-assessment tool as well as the VI-SPDAT. Coordination among homeless service providers as well as mainstream service and housing providers including all those listed in CFR 576.400 (B)(C).

Qualifying homeless persons meeting Category 1 or 4 of the homeless definition found at 24 CFR 576.2 and who are moving into a housing unit that meet HUD's habitability and lead based paint standards are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.104, 576.105, 576.106):

- **Housing Relocation and Stabilization Services** comprised of moving costs, rent application fees, security deposits, last month's rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, financial advocacy such as credit repair/budgeting/money management.
- **Rental assistance** comprised of short-term (up to 3 months) and medium-term (4-12 months) rental assistance, up to 12 months total during a 3-year period in tenant-based or project-based housing. The 12 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent. Rent amount must meet the federal requirements for Fair Market Rent (24 CFR 888) and the HUD standard for rent reasonableness (24 CFR 982.507). There must be a rental agreement between the landlord and agency and a written lease between tenant and landlord. Program participant files must include documentation that verifies homeless status.

RRH Maximum assistance level per one household in FY 21/22 is \$15,080



➤ Homeless Prevention

Homelessness Prevention Component (24 CFR 576.103)

ESG funds may be used to provide housing relocation and stabilization services and short-and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the "at risk of homelessness" definition, or who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in 576.2 and have an annual income below 30 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 576.105, the short term and medium-term rental assistance requirements in 576.106, and the written standards and procedures established under 576.400.

Rapid Rehousing Assistance Component (24 CFR 576.104)

ESG funds may be used to provide housing relocation and stabilization services and short-and/or medium-term rental assistance 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 program 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. The rapid re-housing assistance must be provided in accordance with the housing relocation and stabilization services requirements in 576.105, the short-and medium-term rental assistance requirements in 576.106, and the written standards and procedures established under 576.400.

Prevention Maximum assistance level per one household in FY 21/22 is \$29,000.

➤ HMIS

HMIS Component (24 CFR 576.107)

- (1) The recipient or subrecipient may use ESG funds to pay the costs of contributing data to the HMIS designated by the Continuum of Care for the area, including the costs of:
 - (i) Purchasing or leasing computer hardware;
 - (ii) Purchasing software or software licenses;
 - (iii) Purchasing or leasing equipment, including telephones, fax machines, and furniture;
 - (iv) Obtaining technical support;



- (v) Leasing office space;
- (vi) Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS;
- (vii) Paying salaries for operating HMIS, including:
 - (A) Completing data entry;
 - (B) Monitoring and reviewing data quality;
 - (C) Completing data analysis;
 - (D) Reporting to the HMIS Lead.
 - (E) Training staff on using the HMIS or comparable database; and
 - (F) Implementing and complying with HMIS requirements.
- (viii) 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;
- (ix) Paying staff travel costs to conduct intake; and
- (x) Paying participation fees charged by the HMIS Lead, if the recipient or subrecipient is not the HMIS Lead. The HMIS Lead is the entity designated by the Continuum of Care to operate the area's HMIS.

(2) If the recipient is the HMIS lead agency, as designated by the Continuum of Care in the most recent fiscal year Continuum of Care Homeless Assistance Grants Competition, it may also use ESG funds to pay the costs of:

- (i) Hosting and maintaining HMIS software or data;
- (ii) Backing up, recovering, or repairing HMIS software or data;
- (iii) Upgrading, customizing, and enhancing the HMIS;
- (iv) Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems;
- (v) Administering the system;
- (vi) Reporting to providers, the Continuum of Care, and HUD; and
- (vii) Conducting training on using the system or a comparable database, including traveling to the training.

(3) If the subrecipient is a victim services provider or a legal services provider, it may use ESG funds to 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.



➤ **Administrative Activities** (24 CFR 576.108)

This does not include staff and overhead costs directly related to carrying out activities eligible under 576.101 through 576.107, because those costs are eligible as part of those activities. Eligible administrative costs include:

(4) 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:

(i) Salaries, wages, and related costs of the recipient's staff, the staff of subrecipients, or other staff engaged in program administration. In charging costs to this category, the recipient 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. The recipient may use only one of these methods for each fiscal year grant. Program administration assignments include the following:

- (A) Preparing program budgets and schedules, and amendments to those budgets and schedules;
 - (B) Developing systems for assuring compliance with program requirements;
 - (C) Developing interagency agreements and agreements with subrecipients and contractors to carry out program activities;
 - (D) Monitoring program activities for progress and compliance with program requirements;
 - (E) Preparing reports and other documents directly related to the program for submission to HUD;
 - (F) Coordinating the resolution of audit and monitoring findings;
 - (G) Evaluating program results against stated objectives; and
 - (H) Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in paragraph (a)(1)(i)(A) through of this section.
- (ii) Travel costs incurred for monitoring of subrecipients;
- (iii) Administrative services performed under third-party contracts or agreements, including general legal services, accounting services, and audit services; and
- (iv) 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.
- (v) Training on ESG requirements. Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.
- (vi) Consolidated plan. Costs of preparing and amending the ESG and homelessness-related sections of the consolidated plan in accordance with ESG requirements and 24 CFR part 91.



(vii) Environmental review. Costs of carrying out the environmental review responsibilities under 576.407.

Written Standards for Providing ESG Assistance (24 CFR 576.400(e)(3))

The following written standards for providing ESG assistance are found in 24 CFR 576.400(e).

- (e) Written standards for providing ESG assistance.
- (3) At a minimum these written standards must include:
 - (i) Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG);
 - (ii) Standards for targeting and providing essential services related to street outreach;
 - (iii) Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, and safeguards to meet the safety and shelter needs of special populations, e.g., victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest;
 - (iv) Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;
 - (v) Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing assistance providers; other homeless assistance providers; and mainstream service and housing providers (see 24 CFR 576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable);
 - (vi) Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive rapid re-housing assistance;
 - (vii) Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance;
 - viii) Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time; and
 - (ix) Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing assistance that each program participant may receive, such as the maximum amount of assistance, maximum number of months the program participant receive assistance; or the maximum number of times the program participant may receive assistance.

Those qualifying as “at risk of homelessness” based on Category 2,3,or 4 of the “homeless” definition or based on the “at risk of homelessness” definition found at 24 CFR 576.2 and who reside in a housing unit that meets HUD’s habitability and lead-based paint standards and have an annual income below 30% of Area Median Income (AMI), are eligible for the following services, in compliance with federal ESG rules (24 CFR 576.103, 576.105, 576.106).



Housing Relocation and Stabilization Services: moving costs, rent application fees, security deposits, last month's rent, utility deposits, utility payments, housing search/placement, housing stability case management, mediation and legal services, credit repair/budgeting/money management.

For the above listed programs, the following Financial Assistance criteria will be followed:

- Payment for Financial Assistance costs **shall not** be provided to a participant who is receiving the same type of financial assistance through other public sources or to a participant who has been provided with replacement housing payments;
- Payments shall only be made for fees charged by the owner to all applicants;
- Security Deposit payments shall not exceed two (2) month's rent.
- If last month's rent is required, payment shall not exceed one (1) month's rent and shall be included in calculating the participant's total rental assistance;
- Payments shall only be made for gas, electric, water and sewage deposits;
- Payments shall not exceed 12 months per participant, including no more than 6 months of utility payments in arrears, per service;
- A partial payment counts as 1 month;
- Payment shall only be made if the utility account is in the name of the participant or a member of the same household;
- Participants shall not receive more than 12 months of utility assistance within any 3-year period;
- Payments shall only be made for temporary storage fees accrued after the date the participant begins receiving services and prior to the date that the participant moves into permanent housing. Payment shall not be made for storage fees in arrears.

➤ **Street Outreach**

At Risk of Homelessness as defined in 24 CFR 576.2 means:

- (1) An individual or family who:
 - (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
 - (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and
 - (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;



(D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;

(2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act {42 U.S.C. 9832(11)}, section 41403{6} of the Violence

Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(S)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(S)(A)), section 3(m) of the Food and Nutrition Act of 2008 (.Z.

U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 {42 U.S.C. 1786{b}(15)}; or

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

Eligible activities to be funded under each component of the Emergency Solution Grant are identified in the respective federal regulations. The component funded under this grant are identified below.

Street Outreach Component (24 CFR 576.101)

(1) Engagement. The costs of activities to locate, identify, and build relationships with unsheltered homeless people and engage them for the purpose of providing immediate support, intervention, and connections with homeless assistance programs and/or mainstream social services and housing programs. These activities consist of making an initial assessment of needs and eligibility; providing crisis counseling; addressing urgent physical needs, such as providing meals, blankets, clothes, or toiletries; and actively connecting and providing information and referrals to programs targeted to homeless people and mainstream social services and housing programs, including emergency shelter, transitional housing, community-based services, permanent supportive housing, and rapid re-housing programs. Eligible costs include the cell phone costs of outreach workers during the performance of these activities.

(2) Case management. The cost of assessing housing and service needs, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant. Eligible services and activities are as follows: using the centralized or coordinated assessment system as required under



576.400(d); conducting the initial evaluation required under 576.401(a), including verifying and documenting eligibility; counseling; developing, securing and coordinating services; obtaining Federal, State, and local benefits; monitoring and evaluating program participant progress; providing information and referrals to other providers; and developing an individualized housing and service plan, including planning a path to permanent housing stability.

(3) Emergency health services.

(i) Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals operating in community-based settings, including streets, parks, and other places where unsheltered homeless people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate health services are inaccessible or unavailable within the area.

(iii) Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate emergency medical treatment; and providing medication and follow-up services.

(4) Emergency mental health services.

(i) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions operating in community-based settings, including streets, parks, and other places where unsheltered people are living.

(ii) ESG funds may be used only for these services to the extent that other appropriate mental health services are inaccessible or unavailable within the community.

(iii) 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.

(iv) Eligible treatment consists of crisis interventions, the prescription of psychotropic medications, explanation about the use and management of medications, and combinations of therapeutic approaches to address multiple problems.

(S) Transportation. The transportation costs of travel by outreach workers, social workers, medical professionals, or other service providers are eligible, provided that this travel takes place during the provision of services eligible under this section. The costs of transporting unsheltered people to emergency shelters or other service facilities are also eligible. These costs include the following:

(i) The cost of a program participant's travel on public transportation;

(ii) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;



(iii) The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes and maintenance for the vehicle; and

(iv) The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.

5) Services for special populations. ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1) through (a)(S) of this section. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

People who qualify as “literally” homeless based on Category (1) of the homeless definition found at 24 CFR 576.2 are eligible for the following activities, in compliance with federal ESG rules (24 CFR 576.101): engagement, case management, emergency health, mental health services, and transportation. Program participant files must include documentation that verifies homeless status. Sub-Providers of Street Outreach conduct an assessment/prioritization for purposes of serving or referring clients. Case managers will use the VI-SPDAT assessment tool to document level of service need, history of homelessness and use of community resources. Based on the individual’s needs and wishes, a referral to permanent supportive housing or rapid re-housing can quickly assist the individuals to obtain safe, permanent housing when appropriate.

➤ **Emergency Shelter**

(s) Essential services. ESG funds may be used to provide essential services to individuals and families who are in an emergency shelter, as follows:

(i) Case management. The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Component services and activities consist of:

(A) Using the centralized or coordinated assessment system as required under 576.400(d);

(B) Conducting the initial evaluation required under 576.401(a), including verifying and documenting eligibility;

(C) Counseling;

(D) Developing, securing, and coordinating services and obtaining Federal, State, and local benefits;

(E) Monitoring and evaluating program participant progress;

(F) Providing information and referrals to other providers;



(G) Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking; and

(H) Developing an individualized housing and service plan, including planning a path to permanent housing stability.

(ii) Child care. The costs of child care for program participants, including providing meals and snacks, and comprehensive and coordinated sets of appropriate developmental activities, are eligible. The children must be under the age of 13, unless they are disabled. Disabled children must be under the age of 18. The child-care center must be licensed by the jurisdiction in which it operates in order for its costs to be eligible.

(iii) 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). Component services or activities are screening, assessment and testing; individual or group instruction; tutoring; provision of books, supplies and instructional material; counseling; and referral to community resources.

(iv) Employment assistance and job training. The costs of employment assistance and job training programs are eligible, including classroom, online, and/or computer instruction; on-the-job instruction; and services that assist individuals in securing employment, acquiring learning skills, and/or increasing earning potential. The cost of providing reasonable stipends to program participants in employment assistance and job training programs is an eligible cost. Learning skills include those skills that can be used to secure and retain a job, including the acquisition of vocational licenses and/or certificates. Services that assist individuals in securing employment consist of employment screening, assessment, or testing; structured job skills and job-seeking skills; special training and tutoring, including literacy training and prevocational training; books and instructional material; counseling or job coaching; and referral to community resources.

(v) Outpatient health services. Eligible costs are for the direct outpatient treatment of medical conditions and are provided by licensed medical professionals. Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate health services are unavailable within the community. Eligible treatment consists of assessing a program participant's health problems and developing a treatment plan; assisting program participants to understand their health needs; providing directly or assisting program participants to obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services; providing medication and follow-up services; and providing preventive and non-cosmetic dental care.

(vi) Legal services.

(A) Eligible costs are the hourly fees for legal advice and representation by attorneys

licensed and in good standing with the bar association of the State in which the services are provided, and by person(s) under the supervision of the licensed attorney, regarding matters that interfere with the program participant's ability to obtain and retain



housing.

(B) Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.

{C) Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, and the resolution of outstanding criminal warrants.

(D) Component services or activities may include client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling.

(E) Fees based on the actual service performed (i.e., fee for service) are also eligible, but only if the cost would be less than the cost of hourly fees. Filing fees and other necessary court costs are also eligible. If the subrecipient is a legal services provider and performs the services itself, the eligible costs are the subrecipient's employees' salaries and other costs necessary to perform the services.

(F) Legal services for immigration and citizenship matters and issues relating to mortgages are ineligible costs. Retainer fee arrangements and contingency fee arrangements are ineligible costs.

(vii) 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. Component life skills training are budgeting resources, managing money, managing a household, resolving conflict, shopping for food and needed items, improving nutrition, using public transportation, and parenting.

(viii) Mental health services.

(A) Eligible costs are the direct outpatient treatment by licensed professionals of mental health conditions.

(B) ESG funds may only be used for these services to the extent that other appropriate mental health services are unavailable or inaccessible within the community.

(C) 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.

(D) Eligible treatment consists of crisis interventions; individual, family, or group therapy sessions; the prescription of psychotropic medications or explanations about the use and management of medications; and combinations of therapeutic approaches to address multiple problems.

(ix) Substance abuse treatment services.



- (A) Eligible substance abuse treatment services are designed to prevent, reduce, eliminate, or deter relapse of substance abuse or addictive behaviors and are provided by licensed or certified professionals.
- (B) ESG funds may only be used for these services to the extent that other appropriate substance abuse treatment services are unavailable or inaccessible within the community.
- (C) Eligible treatment consists of client intake and assessment, and outpatient treatment for up to 30 days. Group and individual counseling and drug testing are eligible costs. Inpatient detoxification and other inpatient drug or alcohol treatment are not eligible costs.
- (x) Transportation. Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:
 - (A) The cost of a program participant's travel on public transportation;
 - (B) If service workers use their own vehicles, mileage allowance for service workers to visit program participants;
 - (C) The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and
 - (D) The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.
- (xi) Services for special populations. ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible under paragraphs (a)(1)(i) through (a)(1)(x) of this section. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.
- (2) Renovation. Eligible costs include labor, materials, tools, and other costs for renovation (including major rehabilitation of an emergency shelter or conversion of a building into an emergency shelter). The emergency shelter must be owned by a government entity or private nonprofit organization.
- (3) Shelter operations. Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. 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.
- (4) Assistance required under the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 (URA). Eligible costs are the costs of providing URA assistance under [576.408](#), including relocation payments and other assistance to persons displaced by a project assisted with ESG funds. Persons that receive URA assistance are not considered "program participants" for the purposes of this part, and relocation payments



and other URA assistance are not considered "rental assistance" or "housing relocation and stabilization services" for the purposes of this part.

Emergency shelter is defined as any facility serving the purpose to provide temporary or transitional shelter for the homeless as defined by Category 1 or 4 of the homeless definition found at 24 CFR 576.2.

Individuals and families shall be offered an initial need and eligibility assessment. Shelter providers **must accept referrals from the Coordinated Entry System** and will use the HMIS Continuum wide assessment tool to understand eligibility and begin the process of determining length of assistance. When appropriate, Diversion or Referral, based on the individual's needs and wishes, to Homeless Prevention or Rapid Re-Housing services through the Continuum of Care in an effort to assist individuals to maintain or obtain safe, permanent housing. Prioritization to these services over Emergency Shelter services is required when possible. Emergency Shelters will prioritize those that: cannot be diverted; are literally homeless; can be safely accommodated in the shelter; are not in need of emergency medical or psychiatric services or are a danger to self or others. All others will be referred to appropriate services.

Emergency Shelter specific requirements:

- Emergency Shelters cannot discriminate per HUD regulations.
- There are no requirements related to ID, income or employment.
- Transgender placement is based on self-identification of gender.
- Family Composition, marital status, cannot be the cause for denial.

Participants will be reassessed as case management progresses, based on the individual service provider's policies. Discharge and length of stay Sub-recipients shall make every effort to ensure program participants are discharged from Emergency Shelter services only when they choose to leave or when they have successfully obtained safe, permanent housing. Length of stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants. Length of stay requirements should be realistic and adaptable to meet individual needs. Case Managers shall follow-up via telephone and/or home visit with all participants that have successfully exited the emergency shelter upon 60 days of exit, 120 days of exit, and 12 months upon exit. Follow up should include housing status, income, and number of times participant has relocated since exit.

Minimum hours of operation for year-round facilities: 8am-5pm Monday- Friday

- Minimum hours of operation for Cold Night Shelters: 8pm-7am during inclement weather.
- Cold Night Shelters should open when the temperature falls below 45 degrees.
- Staff supervision whether paid or volunteer must be provided during hours of operation of program.
- Staff members must be qualified personnel that has a cleared background check on file and has signed and understands the confidentiality agreement which should also be on file.
- Provide a minimum of one meal per day.
- A minimal amount of personal information must be collected to establish a daily client log to be kept in case of emergency and/or building needs to be evacuated.



- At intake, each participant shall be informed of evacuation procedures.
- Maps/diagrams of exits should be prominently placed throughout the facility.
- Working fire extinguishers must be readily accessible throughout the building(s).

Sub-recipients shall make every effort to ensure program participants are discharged from Emergency Shelter services only when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants.

Transitional Housing is not an allowable category under ESG. Activities are shelter, case management, child care, education, employment and life skills services, legal services, health and mental health services, substance abuse services and transportation. Program participant files must include documentation that verifies homeless status. Emergency Shelter sub-providers shall admit individuals and families who meet the HUD definition of homeless as specified in 24 CFR 573.2 1 & 4 and agency's eligibility criteria including categories 1 & 4 of the homeless definition.

General ESG Requirements:

All client participants in ESG programs must have a current Release of Information (ROI) on file if their data is entered into HMIS. Refusal by client to sign an HMIS ROI does not automatically constitute refusal of RRH services.

Unit inspections will be conducted using the Housing Quality Standards (HQS) prior to rental assistance commencing. Thereafter, the unit must be inspected annually to ensure that the unit continues to meet HQS. (578.75 b). Also, the dwelling unit must have at least one bedroom or living/sleeping space for each two persons. Children of opposite sex, other than very young children, may not be required to occupy the same bedroom or sleeping area. (578.75(c)).

Case Management Standards include determination of the share of rent and/or utility costs, if any, while receiving RRH assistance, length of time services will be provided and if the amount is to be adjusted over the step-down limits and maximum amount of assistance. Clients will also be informed of the CoC requirement that clients only receive RRH assistance once in a 12-month period unless otherwise approved by the Lead Agency. Based on award and allocation to service providers, these amounts may change with approval from the Lead Agency.

Case Management will continue for a period of one year with weekly case meetings with the client during the first month of move-in, bi-weekly until the third month and monthly beyond the third month if applicable. However, monthly contact is required. Case management will include assistance with receiving appropriate supportive services, assisting client in obtaining other federal, state, and local assistance. Assist client in developing a plan and setting goals to retain permanent housing once the assistance expires and the case manager will oversee the progress of goal attainment.



ESG CV-I & ESG CV- II Addendum November 2020

Purpose:

ESG CARES - Emergency Solutions Grants Program purpose is to prevent, prepare for, and respond to coronavirus, among individuals and families who are homeless or receiving homeless assistance and to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus.

Allowable activities with the ESG CV-I grant will include street outreach, emergency shelter, temporary emergency shelter, rapid re-housing, homeless prevention and HMIS.

On the RRH and Prevention Programs, the following maximum assistance levels apply:

ESG-CVI RRH: Maximum assistance level may not exceed \$17,200 on any one household seeking services over the FY2020/21 grant period.

ESG-CVI Prevention: Maximum assistance level may not exceed \$21,000 on any one household seeking services over the FY2020 grant period.

ESG-CVII remains to be determined as of the date of November 2020

All written standards relevant to regular ESG (FY 23/24) apply with the following additions/exceptions:

As related to ESG-CV funds, the definitions at 24 CFR 576.2 apply, except that:

a. *At Risk of Homelessness*. The CARES Act raised the income limit in paragraph (1)(i) of the “at risk of homelessness” definition at 24 CFR 576.2 from 30 percent of area median income to the Very Low-Income limit of the area, as determined by the Secretary. The entire definition of “at risk of homelessness,” incorporating the higher income limit for ESG-CV activities, is included below for reference.

At Risk of Homelessness means

(i) an individual or family who:

(a) Has an annual income that does not exceed the Very Low-Income Limit of the area, as established for HUD’s Section 8 and Public Housing programs at www.huduser.gov/portal/datasets/il.html;

(b) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social



networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2; and

(c) Meets one of the following conditions:

(I) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;

(II) Is living in the home of another because of economic hardship;

(III) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance.

(IV) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;

(V) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;

(VI) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or

(VII) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan.

(ii) A child or youth who does not qualify as “homeless” under 24 CFR 576.2, but qualifies as “homeless” under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7

U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or

(iii) A child or youth who does not qualify as “homeless” under 24 CFR 576.2, but qualifies as “homeless” under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Temporary Emergency Shelter means any structure or 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. Examples of temporary emergency shelters include:

(i) an overnight, daytime, or 24-hour shelter in which program participants are only provided a safe place to sleep, rest, bathe, and eat.

(ii) a shelter where one or more services are made available on-site, whether by shelter staff or contractors or through a memorandum of understanding with another subrecipient or service provider; and

(iii) a shelter designed to facilitate the movement of homeless individuals and families into permanent housing within a fixed period of time (e.g., within 12 months) and employs or contracts with one or more case managers or service providers to provide services as specified under sections III.E.3.a.(i)(e) and III.E.3.a.(ii)(e) through (h).

(i) *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. This includes providing Personal Protective Equipment to staff and program participants, paying for non-congregate shelter options such as hotels and motels, paying for handwashing stations and portable toilets for use by people living in unsheltered situations, and providing rapid re-housing or homelessness prevention assistance to individuals and families who are homeless or at risk of homelessness (as applicable) to reduce their risk of contracting or further spreading the virus.

(ii) *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 disease. This includes updating written standards to prioritize people at severe risk of contracting coronavirus for shelter and housing consistent with fair housing and nondiscrimination requirements, adapting coordinated entry policies and procedures to account for social distancing measures or increased demand, developing a strategy and recruiting landlords to provide housing to people experiencing homelessness or at risk of homelessness, training homeless providers on infectious disease prevention and mitigation, and implementing a non-congregate shelter strategy to reduce the spread of coronavirus.

(iii) *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 coronavirus. This includes transporting individuals and families experiencing homelessness to medical appointments, paying for shelter to isolate individuals who have contracted coronavirus from other program participants and people experiencing homelessness, providing rental assistance to those who are at risk of losing their housing, have already become homeless, or continue to experience homelessness due to the economic downturn caused by coronavirus, and providing hazard pay to recipient or subrecipient staff who put their own health at risk to continue to provide necessary services to individuals and families experiencing and risk of homelessness.

Given that the NWFL CoC is mostly rural special consideration must be made in the following areas: Case managers will likely be driving long distances to seek out rental properties, engage clients, etc., so there needs to be enough funding for mileage/car rentals. There is likely no public transportation, so addressing client transportation needs is critical.

Technology: As the case managers will likely be mobile (rather than office-based), their technology needs to be well-suited for the working conditions: tablet/laptop and appropriate cell phone coverage/service with hot spot capability. Unit Considerations There will likely be fewer options for rent in rural communities, so think outside of the box—shared housing, renting a room in a house (rather than an apartment), and duplexes. Homeless System Response: Rapid Rehousing Ramp-Up COVID-19 Considerations Rural communities are, in general, not abiding by social distancing/face masks as stringently as urban areas, so case managers (if they are not used to working in rural communities) need to be prepared for these conditions.

The following HUD issued, State requested and CoC approved ESG-CV waivers are in place until June 30, 2022 with the exception of Emergency Shelter activities which will expire on January 31, 2022:



- *Title: Handwashing stations and Portable bathrooms for those experiencing unsheltered homelessness*

Activity: Street Outreach

Funds may be used to install and maintain handwashing stations and bathrooms in outdoor locations for people experiencing unsheltered homelessness.

- *Title: Landlord Incentive*

Activity: Homeless Prevention and Rapid Rehousing

- Signing bonuses equal to up to 2 months of rent;
- Security deposits equal to up to 3 months of rent;
- Paying the cost to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit; and,
- Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.

- *Title: Volunteer Incentives*

Activity: Homeless Prevention; Rapid-Rehousing; Shelter; Street Outreach

Funds may be used to pay to provide reasonable incentives to volunteers who have been and are currently helping to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the coronavirus outbreak. **All volunteers issued incentives must have a Level II background check.**

Title: Emergency Shelter

Activity: Emergency Shelter

Funds may be used only for the costs of providing emergency shelter during the period beginning on the date the recipient or subrecipient began preventing, preparing for, and responding to coronavirus and ending on January 31, 2022, and only for those costs that are necessary to prevent, prepare for, and respond to coronavirus.

Title: Training

Activity: Homeless Prevention; Rapid Rehousing; Shelter; Street Outreach

- Funds may be used for training on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness.
- This training is not considered an administrative cost and is, therefore, not subject to the administrative cap on funding, but only allowable for the above listed purpose.
- Funds may be used for training on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness.



- This training is not considered an administrative cost and is, therefore, not subject to the administrative cap on funding
- These training costs are eligible as a standalone activity and are not to be charged to an activity under 24 CFR 576.101 to 24 CFR 576.109.
- Budget costs under the Street Outreach component in IDIS
- Report costs as a unique budget line item under Street Outreach

Waivers not specific to Activity:

Title: *Temporary stays in Institutions*

An individual may qualify as homeless under paragraph (1)(iii) the homeless definition in 24 CFR 576.2 so long as he or she is exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. https://www.hud.gov/sites/dfiles/CPD/documents/DI-7782-MegaWaiver-5-for-CPD_v2-3-26-2021_JAJ_signed.pdf

Title: *Emergency Shelter and Street Outreach Cap*

The cap established for street outreach and emergency shelter activities in section 576.100(b) does not apply.

Title: *Short-term and Medium-term Rental Assistance*

Medium-term is established as for more than 3 months but not more than 12 months. This alternative requirement will allow more households to receive rapid re-housing and homelessness prevention assistance, which is necessary to prevent, prepare for, and respond to coronavirus

rental assistance- allowable as long as the rent complies with HUD's standards of rent reasonableness, as established under 24 CFR 982.507.

Title: *Hotel/Motel Costs*

Waived so long as the rent complies with HUD's standards of rent reasonableness, as established under 24 CFR 982.507.

Title: *Rapid Rehousing Eligibility*

Allows ESG-CV RRH to be offered to households residing in housing with time-limited rental assistance provided under a homeless assistance program other than the ESG program

Title: Habitability Inspections



Rental assistance can be provided without first inspecting the unit- review waiver details for alternate requirements.

Additional Considerations Highlights: (HUD notice 7-19-2021 – ESG CV) For further information please refer to Hud notice ESG-CV Notice CPD-21-08

1. ***Emergency Shelter:*** The limitation in Notice CPD-20-08 that ESG-CV funds may only be used for the costs of providing emergency shelter until January 31, 2022 has been lifted.
2. ***Temporary Emergency Shelter Activities:*** The limitation in Notice CPD-20-08 that ESG-CV funds may only be used for the costs of providing temporary emergency shelter until January 31, 2022 has been lifted.
3. **Additional Eligible activities:**
 - Cover costs of loaning cell phones with wireless plans to program participants to conduct activities necessary for obtaining and maintaining housing,
 - Providing personal protective equipment to program participants,
 - **Providing laundry services** to individuals and families living in unsheltered locations,
 - Making vaccine incentive payments to people experiencing homelessness,
 - Providing essential services to households receiving rapid re-housing and homelessness prevention assistance as well as program participants residing in hotels and motels paid for with ESG-CV funds,
4. ***Aligning eligibility and reevaluation income limits:*** The income limit of 30 percent of median family income, as determined by HUD, to be eligible for homelessness prevention and to continue to receive homelessness prevention or rapid re-housing assistance has been raised to Very Low Income as described in Section III.E.4 (eligibility) and Section III.F.13 (re- evaluation) of this Notice
5. ***New Rental Assistance Allowances:*** As provided in Section III.E.4.b of this Notice, recipients or subrecipients providing project-based rental assistance may pay for rent for a maximum of 30 days from the end of the month in which the unit was vacated while the recipient or subrecipient attempts to house another eligible program participant in that unit. Additionally, if a program participant moves into a unit in the middle of the month, the Notice provides that the initial payment of a half month's rent does not count towards the program participant's total rental assistance. Further, recipients and subrecipients may allow program participants to enter into subleases when receiving rapid re-housing or homelessness prevention assistance.



6. ***Helping Current ESG Program Participants Maintain Housing.***

The limitation that a program participant may only receive services or rental assistance for up to 24 months in a 3-year period is waived for all program participants while receiving ESG- CV assistance. Further, if a program participant moves into a unit in the middle of the month, the Notice provides that the initial payment of a half month's rent does not count towards the program participant's total rental assistance. See Section III.E.4.g of the Notice for more information. Additionally, the limitation of medium-term rental assistance to 12-months has been lifted.

7. ***Permanent Housing - Habitability and Housing Quality Standards.*** As provided in Section III.F.14, recipients and subrecipients must ensure that housing meets minimum habitability standards established in 24 CFR 576.403(c) or Housing Quality Standards (HQS) established under 24 CFR 982.401 before helping a program participant remain or move into housing. Additionally, recipients may provide housing relocation and stabilization services for individuals and families receiving homelessness prevention assistance without conducting habitability or HQS inspections

8. ***Housing Stability Case Management.*** Recipients and subrecipients providing housing stability case management as allowed at 24 CFR 576.105(b)(2) may pay for housing stability case management for up to 60 days while the program participant is seeking housing, instead of 30 days as currently permitted by 24 CFR 576.105(b)(2). See Section III.E.4.f of this Notice for more information.

9. ***Permitting Recipients and Subrecipients to Subaward Funds to Tribes and Tribally-designated housing authorities.*** The limitation that recipients and subrecipients may not subaward funds to Indian Tribes and Tribally Designated Housing Entities is waived. See Section III.A of this Notice for more information.

10. ***Including Indian Tribes in the Definition of "Subrecipient."*** As provided in Section I.B.1.e of this Notice, the definition of "subrecipient" at 24 CFR 576.2 is waived to expressly include Indian tribes and tribally designated housing entities.



For additional information related to COVID-19, please visit the Hud Exchange by following this link:

<https://www.hudexchange.info/homelessness-assistance/diseases/>

In addition to the above, the State of Florida has requested and received waivers from HUD for the following:

The NWFL CoC will maintain recordkeeping in accordance with HUD standards.

Grievance:

Each client will be made aware of their right to appeal denials of service and to review the grievance policy documentation at the time of initial intake. If at any time the case manager or director decides the applicant is not eligible for services, they will be referred for other services, if applicable and given written notice of their denial within 21 days of their application. The denial notice will include the agency's policy for filing a grievance, as well as, the procedure for filing an appeal. The client will have 7 business days upon receiving the final denial letter to submit an appeal to the agency Director. He/she will have 10 business days to schedule a meeting with the client to review all documentation that supported the denial decision. Upon the Director's review a determination will be made to either support the appeal and overturn the original denial or the denial will stand supported by written notice to the client that denotes why the denial stands and the option to contact the Board of Director's and the Office of Homelessness for further inquiry.

Receipt of Written Standards and Acceptance of Grievance Policy:

_____ Agency Name

_____ Authorized Signature

_____ Authorized Signatory Name

_____ Date