



# Written Standards for Provision of Emergency Solutions Grants (ESG) Assistance

Last Revised April 2022

The following written standards have been developed to assure that ESG-funded programs are compliant and consistent across providers and contracts. Locally, Lake County has partnered with the Lake County Coalition for the Homeless (operating as the Homeless Continuum of Care) to also include Rapid Rehousing grants funded with HUD Continuum of Care dollars. These standards are approved by Lake County's Housing and Community Development Commission and the Lake County Coalition for the Homeless. Through this partnership, the community is able to achieve better, more consistent service for people experiencing homelessness in Lake County.

# Eligibility Evaluation Policy

*Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG.*

Each individual program is allowed to have general criteria by which they evaluate a potential participant's eligibility in an ESG-funded program. All such criteria must be reviewed and approved by the Homeless Assistance Application Review Committee of the Community Development Commission (CDC), and must contain the following:

- All program participants must have an initial consultation with a case manager or other authorized representative who can determine eligibility and the appropriate type of assistance needed.
- A Staff Certification form must be completed with each eligibility evaluation.

For persons who are considered "literally homeless," no additional eligibility criteria are necessary. However, the following documentation requirements for obtaining evidence of homelessness are as follows, listed in the order of priority:

1. Written third-party referral by another housing or service provider (including HMIS recorded referral).
  2. Written observation by the outreach worker.
  3. Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in a shelter.
- For individuals exiting an institution – one of the above forms of evidence and:
    - Discharge paperwork or written/oral referral, or
    - Written record of intake worker's due diligence to obtain above evidence and certification by individual that they exited institution

For persons who are considered at "imminent risk of homelessness," the following documentation is required:

- A court order resulting from an eviction action notifying the individual or family that they must leave; or
- For individual and families leaving a hotel or motel – evidence that they lack the financial resources to stay; or
- A documented and verified oral statement; and
  - Certification that no subsequent residence has been identified; and
  - Self-certification or other written documentation that the individual lacks the financial resources or support necessary to obtain permanent housing.

Finally, persons that are fleeing or attempting to flee domestic violence must have the following documentation:

- *For victim service providers:*
  - An oral statement by the individual or head of household seeking assistance which states: they are fleeing; they have no subsequent residence; and they lack resources to obtain safe and adequate housing on their own. Statement must be documented by a self-certification or a certification by an intake worker.
- *For non-victim service providers (i.e., agencies who do not exclusively serve DV victims):*

- Oral statement by the individual or head of household seeking assistance that they are fleeing. This statement is documented by a self-certification or by the caseworker. Where the safety of the individual or family is not jeopardized, the oral statement must be verified; and
- Certification by the individual or head of household that no subsequent residence has been identified; and
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Lake County does not intend to serve many persons considered homeless under other Federal statutes at this time; however, the following documentation is required:

- Certification by the organization that the individual or head of household seeking assistance met the criteria for homelessness under another federal statute; and
- Certification that the individual or head of household had no permanent housing in the last 60 days; and
- Certification by the individual or head of household, and any available supporting documentation, that (s)he has moved two or more times in the past 60 days; and
- Documentation of special needs or at least two of the following barriers:
  - 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;
  - a history of unstable employment

### ***“At Risk of Homelessness”***

For persons who are considered “at risk of homelessness,” the following criteria apply:

- Program participants must 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 the definition of homeless; and
  - Meets ONE of the following conditions:
    - Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
    - Is living in the home of another because of economic hardship;
    - 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;
    - Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by federal, State, or local government programs for low-income individuals;
    - Lives in a 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 people per room, as defined by the U.S. Census Bureau;
    - 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

- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the Lake County Consolidated Plan;

For persons who are considered “at risk of homelessness,” the following documentation is required:

- A documented and verified oral statement from the program participant; and
- Certification that no subsequent residence has been identified; and
- Self-certification or other written documentation that the individual lacks the financial resources or support necessary to obtain permanent housing; and
- Written documentation that the individual meets one of the conditions listed

### *Eligibility for Continued Assistance*

Individuals and families’ needs for essential services related to emergency shelter will be reassessed on a monthly basis.

All RRH programs must conduct regular re-evaluations, at least annually, of program participants receiving RRH assistance.

To continue to receive RRH assistance, a program participant’s re-evaluation must meet the following continued assistance eligibility criteria:

- Lack of resources and support networks. The program participant’s household must continue to lack sufficient resources and support networks to retain housing without program assistance.
- Need. The recipient or subrecipient must determine the amount and type of assistance that the individual or family will need to (re)gain stability in permanent housing.

In addition, an ESG-RRH re-evaluation must demonstrate:

- Income. For ESG-funded projects, the program participant household's annual income must be less than or equal to 30 percent of Area Median Income (AMI).

# Homeless Services Coordination Policy

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*Policies and procedures for coordination among emergency shelter providers, essential service providers, homelessness prevention and rapid re-housing assistance providers, other homeless assistance providers, and mainstream service and housing providers.*

All ESG-funded programs must participate in the Lake County Homeless Management Information System (HMIS), commonly known as ServicePoint. Only programs that are specifically forbidden by other statutes or regulations (e.g., domestic violence victim service providers) may not participate. All HMIS-participating agencies must collect and maintain common data fields as determined by the HMIS Administrator and HMIS Committee, considering all relevant regulations. Street Outreach providers will keep cases open for 90 days after the last contact, consistent with the HMIS policies. These common practices will be to ensure services are coordinated among organizations – one client, one record. If applicable, post exit assessment will be conducted to ensure services were no longer required.

Lake County worked in concert with the Lake County Coalition for the Homeless, which serves as the Continuum of Care for IL-502 Waukegan/North Chicago/Lake County, to develop a robust system for Coordinated Entry that is tailored to the local need. All ESG-funded providers are expected to comply with the Coordinated Entry policies to assure timely referral to housing providers and engage in appropriate diversion activities. Please reference the Lake County Coalition for the Homeless Coordinated Entry Policies and Procedures for more detail.

Finally, all ESG-funded programs must send a representative to the meetings of the Lake County Coalition for the Homeless. Participation in at least one committee is also required. Failure to attend may result in penalties on future applications.

# Prioritization Policies

*Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance, which eligible families and individuals will receive rapid re-housing assistance, and which eligible families and individuals will receive street outreach assistance.*

## Homelessness Prevention

Any household that may otherwise be eligible for prevention assistance under ESG must also meet the “but for” rule – that is, “Would this individual or family be homeless but for this assistance?”

The “but for” rule can be documented with the following:

- Certification by the individual or head of household that no subsequent residence has been identified; and
- Self-certification or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.

Furthermore, any household that qualifies for prevention assistance and meets the “but for” rule must also have the following qualifications:

- Have no more than three months of arrears; and
- Demonstrate an ability to sustain housing; and
- Demonstrate an ability to earn income; and
- Would remain in housing that is decent, safe, sanitary, and affordable.

If the household cannot meet the above qualifications, it is reasonable to infer that the household is in greater need than prevention assistance can provide for, and the household will be referred to a more appropriate program.

## Rapid Re-Housing

Programs funded to do rapid rehousing in Lake County must use an assessment that identifies barriers to obtaining and maintaining housing. Programs will select participants based on this assessment by prioritizing the population where a rapid rehousing intervention will be most effective. This population will have barriers to housing but not significant barriers. Programs will continue to assess the match between intervention and target population as data is available.

## Street Outreach

Street Outreach should be defined as using ESG (Emergency Solutions Grant) funds to provide essential services necessary to reach out to unsheltered homeless people by connecting them with emergency shelter, housing, or essential services. In addition, providing urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing or an appropriate health facility. Street outreach teams will target and locate unsheltered individuals through concerned citizens, local businesses, community-based organizations, and authorities including local police, schools, and government organizations.

# Rent & Utility Cost Sharing Policy

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*Standards for determining the share of rent and utilities costs that each program participant must pay, if any, while receiving homelessness prevention or rapid re-housing assistance.*

Each individual program is allowed to have general criteria by which they determine a program participant's share of rent and/or utilities in an ESG-funded program. All such criteria must be reviewed and approved by the Homeless Assistance Application Review Committee of the Community Development Commission (CDC).

Rapid rehousing programs will focus subsidies on providing just enough assistance to allow participants to maintain housing. Programs will use a declining subsidy model to allow participants to adjust to subsidy reductions over time. Participants will be better prepared to assume full responsibility for rent as program termination approaches.

# Length of Participation Policy – Financial Assistance

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*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.*

Within homeless prevention programs, ESG funds will be limited to short-term rental assistance (up to three months) and payment of rental arrears (up to three months). Participants may only receive ESG prevention assistance once in a 24-month period.

Rapid rehousing programs will provide rental assistance for a maximum of thirteen months. In addition, payment of a full security deposit and up to three months of rental arrears will be allowed.

In cases where a rapid rehousing household experiences an adverse event and the household's case manager determines additional assistance is warranted, the limits on rental assistance are waived and support may be extended on a month by month basis. Extensions may be provided, so long as there is a demonstrated need, up to the regulatory maximum of 24 months. Any rental arrears provided count towards the 24-month maximum.



# Length of Participation Policy – Housing Stabilization and/or Relocation Services

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*Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide 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 participants receive assistance; or the maximum number of times the program participants may receive assistance.*

The amount and type of Housing Stabilization and/or Relocation Services to be provided to a particular program participant will be determined by the organization providing the assistance within the following parameters:

- Program staff will meet with participants at least once monthly for the duration of their program participation.
- Programs will conduct follow-up with participants, three and six months after they are exited from the program.
- In homeless prevention programs, the duration of such services shall not exceed six months.
- In rapid rehousing programs, services will not exceed sixteen months.
- In cases where a rapid rehousing household experiences an adverse event and the household's case manager determines additional assistance is warranted, the limits on services are waived and support may be extended on a month by month basis. Extensions may be provided, so long as there is a demonstrated need, up to the regulatory maximum of 24 months.
- In cases where a household, during the course of program participation, is determined to be a candidate for permanent supportive housing, the length of rental subsidy limits, declining subsidy model, and limits on services are waived and support may be provided up to the regulatory maximum of 24 months while a permanent supportive housing unit is pursued. The housing placement workgroup of the Lake County Coalition for the Homeless (serving as the Continuum of Care) must provide approval for any household to be granted this waiver.

# Performance Measures

*Performance measures for ESG projects were developed in consultation with the Continuum of Care to align with the strategies to end homelessness in Lake County, the existing reporting requirements of the CoC and the data available in the homeless management information system.*

Lake County developed the following performance measures, in consultation with the Continuum of Care, to help accomplish the following goals:

- Measure program performance
- Align program evaluation between ESG and the CoC
- Measure the County's progress toward homeless services goals as outlined in the Consolidated Plan, Annual Action plan and reported to HUD in the Consolidated Annual Performance and Evaluation Report (CAPER)

Participation in the Homeless Management Information System (HMIS) is required by ESG regulation for all projects receiving ESG funding. Therefore, all performance measures must be tracked in and run out of HMIS, locally known as ServicePoint.

The required ESG performance measures are as follows:

For all programs:

- Average length of stay
- Percentage of households with exits to permanent destinations
- Percentage of households with positive exits from street outreach
- Percentage of adult participants who maintain or increase their income

For Homeless Prevention Programs (except legal services) and Rapid Rehousing Programs:

- Percentage of households who remain in permanent housing six months after their exit from the program

# Landlord Incentives

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*ESG-CV 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 24 CFR 576.200*

ESG-CV funds may be used to pay for landlord incentives that are reasonable and necessary to obtain housing for individuals and families experiencing homelessness and at risk of homelessness. Landlord incentives may not exceed three times the rent charged for the unit. Eligible landlord incentives include:

- Signing bonuses up to two months of rent
- Security deposits equal to up to three months of rent
- Costs 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.
- Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.

Subrecipients should use a tiered approach with landlords, offering incentives in the following order. First, negotiate using existing resources, such as a double security deposit, before offering additional incentives. Next, offer a larger security deposit before offering signing bonus, as this funding will be returned to the client if unused. Finally, only use signing bonuses if other options are exhausted. Also, make sure to enroll the unit in the Landlord Risk Mitigation Fund to assure maximum benefit to the landlord.