
St. Johns County CoC

ESG-CV Written Standards Addendum

I. Introduction

This is an unprecedented time for our vulnerable population and our Coordinated Entry System (CES). Decisions being made are in an effort to prevent the spread of COVID-19. The goal is to utilize Rapid Re-Housing (RRH) when available to quickly exit as many households from shelters as possible. This will offer shelters the ability to increase personal space for shelter guests and reduce the number of people in our congregate shelter setting. Given the fluid nature of the COVID-19 pandemic and continuing guidance from HUD regarding ESG-CV funding, there may be a need to develop additional updates to these policies and procedures.

II. ESG-CV Funded Activities and Additional Eligible Activities

1. ESG-CV Funded Activities:

All activities remain the same, except Homeless Management Information System (HMIS) is now funded to support licenses for the increased staff due to COVID-19.

2. ESG-CV Additional Eligible Activities:

While these are eligible expenses, the recipient and sub-recipients must indicate their intentions to fund additional eligible activities in their submitted budget.

a. Hazard Pay

CARES Act funds will be used to pay hazard pay for recipient or sub-recipient-staff working directly to prevent, prepare for, and respond to coronavirus among persons who are homeless or at risk of homelessness.

b. Landlord Incentives

ESG-CV funds will be used to add the eligible cost of paying for landlord incentives as reasonable and necessary to obtain housing for individuals and families experiencing homelessness and at risk of homelessness. However, a recipient may not use ESG-CV funds to pay the landlord incentives set forth below in an amount that exceeds three times the rent charged for the unit.

Eligible landlord incentive costs include:

- 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.

III. Access and Eligibility of individuals' and families' for assistance under ESG-CV.

Rapid Re-Housing

Prioritization

- Individuals 55 and older;
- Individuals in congregate shelters with underlying medical conditions per CDC guidance;
- Individuals living outside with underlying medical conditions per CDC guidance;
- Zero/low income;
- Disabling conditions;
- Long term homelessness.

<https://www.cdc.gov/coronavirus/2019-ncov/need-extra-precautions/people-with-medical-conditions.html>

IV. Standards for Targeting and Providing Essential Services Related to Street Outreach

Street outreach will engage unsheltered people in nontraditional settings that are least likely to seek housing services, specifically populations at a greater risk of COVID-19 and longest history of homelessness.

V. Policies and Procedures for Admission, Diversion, Referral and Discharge by Emergency Shelters.

Emergency Shelter/ Special Population Shelter (DV & Youth)

Emergency shelter plays an important role in keeping those who are most vulnerable to COVID-19 and other dangers of unsheltered living safer from infection and transmission. The shelter utilizes the diversion process that is approved and employed by our COC to ensure only those who are truly in need are sheltered. Those who are most vulnerable are prioritized for open bed availability. Policies and procedures remain the same, however the shelter is prioritizing those most vulnerable to COVID.

VI. ESG-CV Additional Eligible Activities – Notice CPD-21-08:

HUD issued Notice CPD-21-08 on July 19, 2021. This notice allows for additional eligible activities under ESG-CV.

a. Furniture and Household Furnishings

ESG-CV funds used to prevent, prepare for, and respond to coronavirus will be used to buy furniture and household furnishings for use by program participants while they are receiving homelessness prevention and rapid re-housing assistance. (Notice CPD-21-08, III.E.3.i). However, if the household furnishings still have useful life at the end of stay, they must be returned to the recipient/subrecipient in accordance with 2 CFR 200.313(e).

When household furnishings reach the end of their useful life, disposition follows the rules for equipment. For equipment or assets with a current per unit fair market value under \$5,000, the agency may dispose of the equipment as they see fit with no further obligation to HUD. For equipment or assets with a current per unit fair market value in excess of \$5,000, the recipient should request disposition instructions from your local HUD Field Office CPD Representative and further review the rules for disposition of equipment. (2 CFR 200.313(e)).

Eligible Furniture and Household Furnishings

Eligible furniture and household furnishings will be limited to mattress and bedding purchases. Agencies will assess whether furniture has retained sufficient value to continue to be used for the original project or program. However, for hygiene reasons, furnishings such as a mattress or bedding would likely not retain sufficient value to continue to be used for the original program.

Assistance will be capped at \$5,000 per program participant.

Record Keeping Requirements

Agencies must keep adequate equipment records. With regard to inventory and tracking, 2 CFR 200.313(d)(1) requires that recipients or subrecipients maintain records that include a description of the property, a serial number or other identification number, the source of funding for the property (including the Federal Award Identification Number), who holds title, the acquisition date, and cost of the property, percentage of Federal participation in the project costs for the Federal award under which the property was acquired, the location, use and condition of the property, and any ultimate disposition data including the date of disposal and sale price of the property.

Maintenance and Tracking

Adequate maintenance must be provided for the equipment and to prevent loss, damage, or theft. For example, with regard to the subrecipient's responsibility for tracking furnishings that are loaned to program participants:

- For damaged furnishings, document the damage and dispose of the furnishings.
- For missing furnishings, document the furnishings that were not returned and the subrecipient's due diligence in attempting to recover the furnishings.

b. Essential Services for Individuals and Families Receiving Rapid Re-housing and Homelessness Prevention Assistance.

The limitation on eligible activities provided in section 415(a) of the McKinney-Vento Act and 24 CFR 576.102(a)(1), 24 CFR 576.103, and 24 CFR 576.104 are waived to the extent necessary to allow ESG-CV funds to be used for the costs of providing essential services established at 24 CFR 576.102(a)(1) to program participants receiving rapid rehousing and homelessness prevention assistance as necessary to

assist them to obtain and maintain housing. Recipients are reporting that program participants receiving rapid re-housing and homelessness prevention assistance require services beyond those allowed at 24 CFR 576.105(b) – such as mental health services, outpatient health services, transportation, substance abuse services – to help them obtain and maintain housing. Therefore, this waiver and alternative requirement are necessary to help program participants obtain and maintain housing, which is critical to preventing the spread of coronavirus and mitigating its impact on program participants during the economic downturn caused by coronavirus.

(1) 24 CFR 576.102(a)(1) *Essential services.* ESG funds may be used to provide essential services to individuals and families, 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 noncosmetic 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.