

Emergency Solutions Grant Supplemental Funds (ESG-CV)

OVERVIEW

As authorized by the Coronavirus Aid, Relief, and Economic Security Act (CARES Act), Dane County Continuum of Care (CoC) will receive \$1,887,265 Emergency Solutions Grant Program Supplemental Funds (ESG-CV) allocated to the State of Wisconsin by the U.S. Department of Housing and Urban Development (HUD). The City of Madison will receive additional \$2,890,929.

The ESG-CV funds must be used **to prevent, prepare for, and respond to the coronavirus pandemic** (COVID-19) among individuals and families who are homeless or receiving homeless assistance, as well as support additional homeless assistance and homelessness prevention activities to mitigate the impacts of COVID-19.

Most ESG funding requirements specified in the HUD ESG Interim Rule and the Dane County CoC Written Standards remain in effect, while some requirements have been waived or changed for the ESG-CV funds.

The Dane County CoC Board of Directors is responsible for making funding allocation decisions for the funds allocated to Dane County CoC. The City of Madison Community Development Division will serve as the grant recipient and enter into contracts with the nonprofit agencies (subrecipient) to provide the activities approved by the Dane CoC Board of Directors.

ELIGIBLE ACTIVITIES

A. STREET OUTREACH (24 CFR §576.101)

- **Eligible participants:** Individuals and families living on the streets or other places not meant for human habitations such as cars, parks or abandoned buildings
- **Eligible costs: Essential services** to reach out to people experiencing unsheltered homelessness who reside in places not meant for human habitation, such as cars, parks, sidewalks, abandoned buildings, or on the streets; connect them to emergency shelter, housing or critical services; and provide urgent, nonfacility-based care. Eligible costs include engagement, case management, emergency health services, emergency mental health services, and transportation. Services for special populations (homeless youth, victim services, and services for living with HIV/AIDS) are eligible, so long as the costs of providing these services are above mentioned eligible costs.

B. EMERGENCY SHELTER (24 CFR §576.102)

- **Eligible participants:** Individuals and families defined as homeless under the HUD

Category 1 (literal homeless), Category 2 (imminent risk of homeless), Category 3 (homeless under other federal statutes), or Category 4 (fleeing/attempting to flee DV)

- **Eligible costs:**
 - **Essential services** for individuals and families currently residing in an emergency shelter. Eligible costs include case management, childcare, education services, employment assistance and job training, outpatient health services, legal services, life skills training, mental health services, substance abuse treatment services, and transportation. Services for special populations (homeless youth, victim services, and services for living with HIV/AIDS) are eligible, so long as the costs of providing these services are above mentioned eligible costs.
 - **Shelter operations** include operating costs for the shelter, such as maintenance, rent, security, fuel, equipment, insurance, utilities, food, furnishings, and other supplies necessary for shelter operation. If no appropriate emergency shelter is available for a homeless individual or family, eligible costs may also include a hotel or motel voucher for that individual and family.
 - **Renovation** of a building to serve or that currently serves as an emergency shelter. Eligible costs include labor, materials, and tools. ESG-CV funds may also be used to provide temporary shelters (through leasing of existing property, temporary structures, or other means) to prevent, prepare for, and respond to COVID-19.

C. HOMELESSNESS PREVENTION (24 CFR §576.103)

- **Eligible participants:** Individuals and families defined as homeless under the HUD Category 2 (imminent risk of homeless), Category 3 (homeless under other federal statutes), Category 4 (fleeing/attempting to flee DV), or individuals and families defined as At Risk of Homelessness. In addition, participants must have an annual income below 50% of Area Median Income.

FY2020 HUD Income Limits –Dane County	
No. in Family	Maximum Income Limit (50% of AMI)
1	\$35,050
2	\$40,050
3	\$45,050
4	\$50,050
5	\$54,100
6	\$58,100
7	\$62,100
8 or more	\$66,100

- **Eligible costs:**
 - **Short-term and/or medium-term rental assistance** necessary to prevent individuals and

families from moving into an emergency shelter or living in a place not meant for human habitation. Eligible costs include short-term (up to 3 months of rent) and medium-term rental assistance (up to 24 months of rent), and rental arrears (one-time payment for up to 6 months of rent in arrears).

- **Housing relocation and stabilization financial assistance** include rental application fees, security deposits (no more than 2 months' rent), last month's rent, utility deposits, utility payments (up to 24 months of utility payments or up to 6 months of utility payments in arrears), and moving costs.
- **Housing relocation and stabilization services** include housing search and placement, housing stability case management, mediation, legal services, and credit repair.

D. RAPID RE-HOUSING (24 CFR §576.104)

- **Eligible participants:** Individuals and families defined as homeless under the HUD Category 1 (literal homeless) or Category 4 (fleeing/attempting to flee DV) who also meet the criteria for Category 1
- **Eligible costs:**
 - **Short-term and/or medium-term rental assistance** necessary to prevent individuals and families from moving into an emergency shelter or living in a place not meant for human habitation. Eligible costs include short-term (up to 3 months of rent) and medium-term rental assistance (up to 24 months of rent), and rental arrears (one-time payment for up to 6 months of rent in arrears).
 - **Housing relocation and stabilization financial assistance** include rental application fees, security deposits (no more than 2 months' rent), last month's rent, utility deposits, utility payments (up to 24 months of utility payments or up to 6 months of utility payments in arrears), and moving costs.
 - **Housing relocation and stabilization services** include housing search and placement, housing stability case management, mediation, legal services, and credit repair.

E. HOMELSS MANAGEMENT INFORMATION SYSTEM (HMIS) (24 CFR §576.107)

- The HEART Act makes HMIS participation a statutory requirement for ESG-funded service providers.
- **Eligible Costs:**
 - Equipment & software
 - Training & overhead
 - HMIS participation fees
 - Staffing for operating HMIS, including completing data entry, monitoring and reviewing data quality, completing data analysis, reporting to the HMIS lead, training staff on using the HMIS, and implementing and complying with HMIS requirements
 - (For a victim services provider or a legal services provider) costs to operate a comparable database

- HMIS lead agency activities

F. ADMINISTRATION (24 CFR §576.108)

- Agencies may request up to 4% of the proposed budget on ESG administrative expenses related to the planning and execution of ESG activities.
- Eligible costs:
 - Staffing costs for general management, oversight and coordination, including preparing program budget and schedules, developing systems for assuring compliance with program requirements, developing interagency agreements and agreements with sub-recipients, monitoring program activities for progress and compliance with program requirements, preparing reports, coordinating the resolution of audit and monitoring findings, evaluating program results

Please see the following attachments for more information regarding eligible participants for each project type:

Attachment A: ESG-CV Eligible Participant Categories

Attachment B: HUD's Homeless Definition

Attachment C: HUD's At Risk of Homeless Definition

Attachment D: HUD's Participant Eligibility Documentation Requirements

ESG-CV FUNDING PRIORITIES

The Homeless Services Consortium of Dane County Board of Directors specified the following funding priorities for this RFP:

PRIORITIES – TARGET POPULATIONS AND PROGRAM DESIGN

- Programs targeting people who are at higher risk for severe illness (older adults and people who have serious underlying medical conditions) if contracting COVID 19
- Programs serving populations highly impacted by COVID 19 but underserved
- Programs not funded by other funding sources
- Programs utilizing a peer support model

PRIORITIES – PROGRAM TYPES

- **To Prevent Homelessness**
 - Legal services
 - Short term financial assistance not covered by other resources such as utility payments and move in costs
- **To Support Persons & Families Experiencing Homelessness**

- Street outreach supplies
- Shelter staffing cost, both operational and supportive services (case management and housing search and placement)
- Medium to long-term space and operation cost for appropriate congregate shelter for single men
- **To End Homelessness**
 - Rapid Rehousing for single adults prioritizing youth (age up to 24) and older adults (age 65+) who are at or qualify for vulnerable population hotel according to the COVID 19 supplemental written standards
 - Entry cost assistance (housing relocation and stabilization financial assistance) for people in congregate shelters, non-congregate shelters and unsheltered

ESG-CV FUNDING REQUIREMENTS

All requirements specified in the HUD ESG Interim Rule remain in effect for the ESG-CV funds except for the requirements waived by HUD. The ESG Interim Rule can be found here:

https://files.hudexchange.info/resources/documents/HEARTH_ESGInterimRuleandConPlanConformingAmendments.pdf

GENERAL REQUIREMENTS

- **Coordinated Entry:** Coordinated Entry (CE) is a system designed to ensure that all people experiencing a housing crisis have fair and equal access to housing assistance, and are quickly identified, assessed for, and connected to housing and homeless assistance based on their strengths and needs. It uses standardized tools and practices, incorporates a system-wide housing first approach, and coordinates assistance so that those with the most severe service needs are prioritized. This approach has been adopted locally, and is guided by the U.S. Office of Housing and Urban Development's (HUD) Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act. ESG-CV funds require participation in the local CE system. This will include following the Dane County CoC CE policies to fill housing vacancies and disperse financial assistance.
- **Written Standards:** All projects must comply with applicable sections of the local Written Standards. Dane County CoC Written Standards and COVID-19 Supplemental Written Standards can be found on the Homeless Services Consortium of Dane County website: <https://www.danecountyhomeless.org/governance>. Submission of the applicable Written Standards Checklists will be required for this RFP.
- **HMIS:** Agencies must enter client level data into Homeless Management Information System (HMIS) and adhere to data quality procedures as stipulated in the [Wisconsin HMIS Policies](#)

[and Procedures](#). In Wisconsin, the HMIS designated by the HUD CoC is Wisconsin Service Point (WISP). Victim service providers cannot participate in HMIS and Legal Services Organizations may choose to not participate in HMIS. Providers which do not participate in HMIS must use a comparable database that produces unduplicated, aggregate reports.

- **Program participant eligibility documentation:** Agencies must document participant eligibility according to the HUD standard. See **Attachment B** for the documentation requirements.
- **Record keeping and retention:** Agencies must be able to collect and report participant-level demographic and service data as described in any resulting contract. Agencies must implement policies and procedures to ensure privacy and confidentiality of participant records for both paper files and electronic databases. Program and financial records must be maintained for a minimum of five years after the final expenditure under the contract.
- **Reporting:** Agencies will be required to submit a monthly performance report and invoice to the City of Madison. At the end of the program year, agencies must submit the Consolidated Annual Performance and Evaluation Report (CAPER) generated from HMIS to HUD. All emergency shelters and Rapid Rehousing programs must complete a census for the fourth Wednesday of the month on the Housing Inventory Chart (HIC) maintained by the Dane County CoC.
- **Housing First:** While HUD encourages agencies to offer treatment and supportive services when necessary to assist vulnerable populations, individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities as a condition for receiving shelter, housing, or other services for which the funds are used.

RENT ASSISTANCE SPECIFIC REQUIREMENTS

- **Violence Against Women Act (VAWA):** Agencies that provide rental assistance (homelessness prevention or Rapid rehousing) are responsible for ensuring that a notice of VAWA protections (HUD forms 5380 and 5382) are provided to each applicant for ESG rental assistance and each program participant receiving ESG rental assistance at each of the following times: when an individual or family is denied ESG rent assistance; when a program participant begins receiving ESG rental assistance; when a program participant is notified of termination of ESG rental assistance; when a program participant receives notification of eviction. The VAWA Lease Addendum (HUD 91067) must also be signed with every lease.
- **Habitability Standards and Lead Screening Inspection:** Agencies are required to conduct a Habitability Standards and Lead Screening Inspection on any unit in which a participant will be receiving ESG financial or rental assistance. Agencies must certify that the unit has passed both inspections before any ESG funds can be expended. A checklist or self-certification

completed by a property owner or household will not be acceptable. Agencies may conduct a virtual inspection by viewing videos or photographs taken by the property owner or household during the pandemic, but should conduct a full in-person inspection once it is safe to resume standard operating procedures.

- **Rent Reasonableness Documentation:** Agencies must determine whether a unit's rent is reasonable in comparison to rent for other comparable unassisted units.

APPLICABLE WAIVERS

HUD published waivers of certain regulatory requirements to prevent the spread of COVID-19 and facilitate assistance to eligible households economically impacted by COVID-19. The following waivers are applicable to the ESG-CV funds. All other ESG requirements specified in the ESG Interim Rule must be followed.

- **Match:** ESG funds require 100% cash or in-kind match, but the ESG-CV funds are exempt from the requirement. No match is required for this RFP.
- **Re-evaluation of homelessness prevention assistance:** Homelessness prevention assistance is subject to re-evaluation of each program participant's eligibility not less than once every three months. The HUD waiver allows the agencies to conduct the required re-evaluations not less than once every 6 months for the duration of the grant term.
- **Housing stability case management:** Program participants receiving homelessness prevention or Rapid Rehousing assistance must meet with a case manager not less than once per month. This requirement is waived through the duration of the grant term. Staff should attempt to connect to program participants via phone, text, email or other virtual means, if in-person meeting is difficult to arrange.
- **Fair Market Rent:** ESG rental assistance cannot be provided unless the total rent is equal to or less than the FMR established by HUD. This requirement is waived for homeless prevention assistance or Rapid Rehousing assistance lease executed by September 30, 2020.

ESG-CV Eligible Participant Categories

Component	Eligible Homeless or At Risk Categories
Street Outreach	<ul style="list-style-type: none"> • Category 1 Homeless- Literally Homeless • Must be living on the streets or other places not meant for human habitation and be unwilling or unable to access services in emergency shelter
Emergency Shelter	<ul style="list-style-type: none"> • Category 1 Homeless – Literally Homeless • Category 2 Homeless – Imminent Risk of Homeless • Category 3 Homeless – Homeless under Other Federal Statutes • Category 4 Homeless – Fleeing/Attempting to Feel Domestic Violence
Homelessness Prevention	<ul style="list-style-type: none"> • Category 2 Homeless – Imminent Risk of Homeless • Category 3 Homeless – Homeless under Other Federal Statutes • Category 4 Homeless – Fleeing/Attempting to Feel Domestic Violence • At-Risk Homelessness • Must have an annual income below 50% (ESG-CV) of Area Median Income at program entry
Rapid Rehousing	<ul style="list-style-type: none"> • Category 1 Homeless – Literally Homeless

HUD's Homeless Definition

Homeless Definitions	
Category 1: Literally Homeless	Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ol style="list-style-type: none"> (1) Has a primary nighttime residence that is a public or private place not meant for human habitation; or (2) Is living in a shelter designated to provide temporary living arrangements (including transitional housing and hotels/motels paid for by charitable or government organizations); OR (3) Is exiting an institution where (s)he has 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.
Category 2: Imminent Risk of Homelessness	Individual or family who will imminently lose their primary nighttime residence, provided that: <ol style="list-style-type: none"> (1) Primary residence will be lost within 14 days of the date of application for assistance; (2) No subsequent residence has been identified; AND (3) Household lacks the resources or support networks needed to obtain other permanent housing.
Category 3: Homeless under other Federal Statutes	Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who: <ol style="list-style-type: none"> (1) Are defined as homeless under one of the following: <ol style="list-style-type: none"> i. Section 387 of the Runaway and Homeless Youth Act; ii. Section 637 of the Head Start Act; iii. Section 41403 of the Violence Against Women Act of 1994; iv. Section 330(h) of the Public Health Service Act; v. Section 3 of the Food and Nutrition Act of 2008; vi. Section 17(b) of the Child Nutrition Act of 1966; vii. Section 725 of the McKinney-Vento Homeless Assistance Act; (2) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the assistance application; (3) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; AND (4) Can be expected to continue in such status for an extended period of time due to special needs or barriers
Category 4: Fleeing/Attempting to Flee Domestic Violence	Any individual or family who: <ol style="list-style-type: none"> (1) Is fleeing, or is attempting to flee, domestic violence; (2) Has no other residence; AND (3) Lacks the resources or support networks to obtain other permanent housing

HUD At-Risk of Homelessness Definition

At-Risk of Homelessness Definition
<p>(1) An individual or family who:</p> <ul style="list-style-type: none">i. Has an annual income below 30% of median family income for the area; andii. Does not have sufficient resources or support networks immediately available to prevent them from becoming homeless; ANDiii. Meets one of the following conditions:<ul style="list-style-type: none">a. Has moved due to economic reasons 2 or more times during the 60 days immediately; preceding the application for assistanceb. Is living in the home of another because of economic hardship;c. Has been notified in writing that their current living situation will be terminated within 21 days;d. Lives in a hotel/motel and is self-paying;e. Lives in a housing unit in which more than 1.5 persons reside per room;f. Is exiting a publicly funded institution or system of care (such as a health-care facility, foster care, or correction institution); ORg. Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness.
<p>(2) A child or youth who qualifies as "homeless" under one of the following:</p> <ul style="list-style-type: none">i. Section 387(3) of the Runaway and Homeless Youth Actii. Section 637(11) of the Head Start Actiii. Section 41403(6) of the Violence Against Women Act of 1994iv. Section 330(h)(5)(A) of the Public Health Service Actv. Section 3(m) of the Food and Nutrition Act of 2008vi. Section 17(b)(15) of the Child Nutrition Act of 1966
<p>(3) A child youth who qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) of that child or youth living with her or him</p>

HUD's Participant Eligibility Documentation Requirements

Homelessness Documentation Requirements	
Category 1: Literally Homeless	<ul style="list-style-type: none"> • Written observation by outreach worker or written referral by another service provider; <u>OR</u> • Self-certification by individual or head of household seeking assistance; <u>OR</u> • For individuals exiting an institution – one of the above <u>AND</u>: <ul style="list-style-type: none"> ○ Discharge paperwork <u>or</u> written/oral referral <u>OR</u> ○ Written record of intake worker's due diligence to obtain above evidence <u>and</u> certification by individual that they exited institution.
Category 2: Imminent Risk of Homelessness	<ul style="list-style-type: none"> • A court order resulting from an eviction notice notifying the individual or family that they must leave; <u>OR</u> • For individuals and families leaving a hotel/motel – evidence they lack the financial resources to stay; <u>OR</u> • A documented and verified oral statement. <u>AND</u> • Certification that no subsequent residence has been identified and self-certification that the individual lacks the financial resources and support necessary to obtain permanent housing
Category 3: Homeless under other Federal Statutes	<ul style="list-style-type: none"> • Certification by a nonprofit or state/local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute <u>AND</u> • Certification of no permanent housing in last 60 days <u>AND</u> • 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 <u>AND</u> • Documentation of special needs <u>or</u> 2+ barriers
Category 4: Fleeing/Attempting to Flee Domestic Violence	<ul style="list-style-type: none"> • Statement by the individual or head of household seeking assistance stating: <ul style="list-style-type: none"> ○ They are fleeing; ○ No subsequent residence has been identified; <u>AND</u> ○ They lack the financial resources and support networks to obtain other permanent housing. • Statement must be documented by a self-certification or a certification by an intake worker.
At-Risk of Homelessness	<ul style="list-style-type: none"> • Self-certification or other written documentation that the individual lacks the financial resources and support necessary to obtain permanent housing <u>AND</u> • Documentation of one of the eligibility conditions <u>OR</u> • Certification by a nonprofit or state/local government that the individual or head of household seeking assistance met the criteria of homelessness under another federal statute