



Community Development
Policies and Procedures

***Written Standards for Provision of Emergency
Solutions Grant Assistance***

Department of Planning & Development
Office of the City Manager

Overview and Purpose of the Written Standards

In accordance with 24 CFR 91.220(l)(4)(i) and 567.400(e)(1), The City of Lowell's Department of Planning and Development has developed the following written standards for the provision and prioritization of Emergency Solutions Grant (ESG) funding.

The City of Lowell receives ESG funds annually from the U.S. Department of Housing and Urban Development (HUD) under the Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 (HEARTH Act), enacted into law on May 20, 2009. The ESG program supports eligible activities that enable communities to prevent homelessness, identify sheltered and unsheltered homeless persons, as well as those at-risk of homelessness, and provide the supportive services necessary to ensure that homeless individuals and families are rapidly rehoused and move toward independent living.

ESG provides funding to: (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents, (5) rapidly re-house homeless individuals and families, and (6) prevent families/individuals from becoming homeless.

The HUD ESG program allows each municipality that administers these funds to set priorities based on the individualized needs of the community. These written standards serve to outline the specific guidelines and priorities that will be used by the City of Lowell's Department of Planning and Development in awarding and administering ESG funding. The following standards outlined, beginning on the next page are the basic standards but are not an exhaustive list of HUD requirements. For additional information, please refer to 24 CFR 576 for a more complete list of ESG requirements per the ESG Interim Rule.

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A. Standard Policies and Procedures for Evaluating Individuals' and Families' Eligibility for Assistance under ESG.

1. Eligibility- ESG

The following eligibility criteria must be met for an individual or family to be provided with any ESG assistance.*

At the very basic level, ESG Program participants must meet the definition of “homeless” or “at-risk of homeless” as specified in the ESG Interim Rule regulations, 24 CFR 576.2. [Definitions](#) (also found and defined in the HUD Consolidated Plan regulations [Definitions](#), 24 CFR 91.5).

Further details on the definition of “homeless” and at “risk of homeless” are also available in Appendices as listed: ***Attachment 1** Homeless Definition (Criteria for Defining Homelessness and Record Keeping Requirements), and **Attachment 2**. At Risk of Homelessness Definition. Note that Criteria for Defining At Risk of Homelessness also includes additional information on record keeping requirements for each definition. *Also refer to 24 CFR 576.500 Record Keeping and Reporting Requirements for details.*

Eligibility specific to Emergency Shelter or Street Outreach

Persons and families served with **ESG Emergency Shelter** or **Street Outreach** must be literally homeless.

Emergency Shelter Eligibility*

Per the *definition of homelessness*, 24 CFR 576.2 and the following categories of the homeless definition are eligible (categories 1, 2, 3, 4 , as listed below):

- Category 1- Literally Homeless,
- Category 2-Imminent Risk of Homelessness
- Category 3-Homeless Under Other Federal Statutes-
- or Category 4- Fleeing/Attempting to Flee Domestic Violence Prioritization.

Street Outreach eligibility *

Individuals/ households who meet the *definition of homeless, Category 1- who are Literally Homeless* are eligible for Street Outreach assistance. Individuals and families 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.

*See attached **Appendix A**. “Homeless definition” entitled “Criteria for Defining Homelessness”:

2. Intake Documentation Order of Prioritization for Street Outreach and Emergency Shelter.

The following is the order of Prioritization of Intake Documentation for Street Outreach and Emergency Shelter:

Homeless documentation status is prioritized in the following manner:

- 1) 3rd party documentation,
- 2) intake worker observations, and
- 3) certification from the person seeking assistance. That is the order of priority for record keeping during client intake.

Records contained in an HMIS or comparable database (for Victim Service Providers) are also acceptable 3rd party documentation. Also, if written records/ HMIS data is not available, a certified statement of homeless status should be completed by the person seeking assistance which the intake worker would keep on file.

Persons fleeing domestic violence may provide an oral statement certifying they are fleeing domestic violence and had no subsequent resident and lack resources (see Section 24 CFR 576.500 Record Keeping and Reporting Requirements for details).

However, a lack of third-party documentation must not prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

Section B of the written standards contains more details on the priorities specific to emergency shelter and street outreach.

3. Eligibility- Homeless Prevention

To be eligible for homeless prevention clients assisted must be at-risk of homelessness must meet the criteria under the “at risk of homelessness” definition.

Persons assisted with Homeless Prevention must meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition in 24 CFR §576.2 *and* have an annual income below 30 percent of median family income for the area, as determined by HUD. Please note that *HUD Income Limits are updated annually.*

Furthermore, only residents who are residing in Lowell are eligible for homeless prevention assistance. However, they can be re-housed into a more stable permanent housing unit located outside of Lowell but within the Balance of State Continuum of Care area.” Please refer to Appendix Section of these standards for the service area.

4. Eligibility- Rapid Re-Housing

To be eligible for rapid re-housing, clients assisted must meet paragraph 1 of the [HUD definition for homelessness and category 4- fleeing/ attempting to flee domestic violence](#). For reference, see Attachment 1 Homeless Definition (Criteria for Defining Homelessness and Record Keeping Requirements).

Centralized coordinated intake is required for street outreach, emergency shelter, and rapid rehousing providers, which shall assist with better targeting and serving the needs of homeless persons among providers. This is in conjunction with the coordinated entry process for the Balance of State CoC. The use of HMIS is also required for non- Victim Service Providers. Victim Service providers are required to use an alternative database.

a) Intake Documentation Order of Prioritization for Homeless Prevention and Rapid Re-housing.

The order of priority for intake documentation eligibility should be as follows:

- (1) third-party documentation;
- (2) intake worker observations;

and (3) self-certification.

For reference see Appendix B. “At Risk of Homelessness Definition. Note that Criteria for Defining At Risk of Homelessness also includes additional information on record keeping requirements for each definition.

For more specific details on intake record keeping refer to *Attachment 1. Homeless Definition: Record Keeping Requirements* which includes additional information on record keeping requirements for homeless definition category.

The next Section B of these written standards and Section D further detail the intake process. Section C, of the written standards further specifies priorities for clients receiving homeless prevention/ rapid re-housing assistance.

B. Standards for targeting and providing essential services related to street outreach.

ESG-funded Street Outreach targets unsheltered individuals and families within the City of Lowell. Eligibility for Street Outreach was detailed in *Section A* above.

Street Outreach must be used to assist Category 1- Literally Homeless as defined in the *definition of Homelessness*. Individuals and families 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.

Essential services that are available for persons/ families meeting this criteria, is explained in 24 CFR 576.101. Generally, funding may be used to provide the essential services necessary to reach out to unsheltered homeless people, connect them with emergency shelter, housing, or critical services, and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. Eligible services consist of engagement, case management, emergency health and mental health services, services for special populations, and transportation. It also includes the provision of crisis counseling, addressing urgent needs, and actively connecting homeless persons to information and resources.

ESG Street Outreach service providers must determine an individual or family’s vulnerability and/or ability to access emergency shelter, housing, or health care facility to ensure that assistance is granted toward those demonstrating the greatest need. Funds may also be used to provide services for special populations, including youth, victims of domestic violence, and people with HIV/AIDS so long as the costs are eligible under Street Outreach as listed in the paragraph above.

City of Lowell ESG subrecipients use the Massachusetts Balance of State Continuum of Care Centralized coordinated intake process which includes intake for Street Outreach providers when possible. This process is further detailed in the next section of the written standards.

C. Policies and Procedures for admission, diversion, referral, and discharge by emergency shelters 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

Intake and Prioritization

The City of Lowell is located within the In the Massachusetts Balance of State (MA BoS) service area. The State of Massachusetts Executive Office of Housing and Livable Communities (EOHLC) administers and manages the Balance of State CoC. The MA BoS uses CoC VESTA as its standard Homeless Management Information System (HMIS) for CoC subrecipients and program beneficiaries which allows for coordinated intake and entry. The coordinated entry and HMIS intake process assists with better targeting and serving the needs of homeless persons among providers.

The BoS requires CoC Centralized coordinated intake for Emergency Shelter, Street Outreach, and Rapid Rehousing CoC beneficiaries. ESG beneficiaries are also required to be processed through the standard centralized or coordinated assessment system, pursuant to HUD regulations, 24 CFR 576.400(d). Therefore, the City of Lowell DPD requires ESG providers of Street Outreach, Emergency Shelter, and Rapid Re-housing to use the established CoC Coordinated entry process.

The use of HMIS is also required for all ESG subrecipients. In accordance with HMIS policy, all data must be logged on services provided, referrals, and discharges. The exception is VSP providers who are allowed to use an comparable alternative database and who must not directly input data into HMIS. VSP providers use a separate database from the CoC. However, VSP providers still participate in coordinated entry but don't provide identifying information.

Priority for housing opportunities are determined through the use of the Coordinated Entry Quick Screen, Coordinated Entry Assessment, and Housing Preference Form built into the CoC's HMIS, VESTA. The system prioritizes by screening for basic eligibility and housing preferences, and then prioritizes participants for housing openings based on their vulnerability score and the region of their choice. Referrals for permanent supportive housing, transitional housing, and rapid rehousing are governed by the outcome of this assessment which provides a vulnerability score based on the answers to a series of standardized questions. This approach to the targeting of housing resources is designed to reduce the average length of episodes of homelessness and result in better housing outcomes for all. Participants targeted for Permanent Supportive Housing based on their CE score may be offered a less service intensive housing resource (e.g., transitional housing or Rapid Rehousing) if deemed appropriate to address concerns over the excessive length of the waitlist for Permanent Supportive Housing.

In addition to the intake process, service providers should work with program participants regularly in identifying their most critical needs, housing, and stabilization options.

*This Centralized Coordinated Entry process including the admission and prioritization process will be further detailed in the next **section D** of the written standards.

Transfer / Discharge Policies for Special Populations:

Involuntary Family Separation 24 CFR 576.102 4(b)

Section 576.102(b) of the ESG interim rule prohibits ESG-funded programs from denying a family admission to an ESG-funded program or ESG-funded services based on the age of a child under the age of 18 if the program provides services to families with children. In other words, the age, of a child under age 18 must not be used as a basis for denying any family's admission

to an emergency shelter that uses Emergency Solutions Grant (ESG) funding or services and provides shelter to families with children under age 18. For example, providers are required to accommodate whole families, and not deny admission or separate families due to the presence of a teenage boy in the household.

Violence Against Women Act (VAWA)

On November 16, 2016, HUD published the Violence Against Women Act (VAWA) final rule regarding housing protections for victims of domestic violence, dating violence, sexual assault, or stalking. This final rule prohibits an applicant for assistance or tenant assisted with ESG from being denied assistance under, denied admission to, terminated from participation in, or evicted from housing on the basis or as a direct result of the fact that the applicant or tenant is or has been a victim of domestic violence, dating violence, sexual assault or stalking, so long as the applicant otherwise qualifies for admission, assistance, participation or occupation ([24 CFR 5.2005 \(b\)\(1\)](#)).

Victims of Domestic Violence Emergency Transfer Policy

In addition, the VAWA Final Rule requires that each housing provider produce a detailed emergency transfer plan, which ensures that a tenant receiving rental assistance through or residing in a unit subsidized under an ESG housing program who is a victim of domestic violence, dating violence, sexual assault, or stalking qualifies for an emergency transfer within the criteria stated in [24 CFR 5.2005 \(e\)\(2\)](#).

A tenant (receiving homeless prevention funds or rapid rehousing assistance) in an ESG program who is the victim of domestic violence, dating violence, sexual assault or stalking that requests a transfer will be transferred within the program or outside the program to next available CoC- or ESG-funded unit for which the person or household is eligible under HUD's rules, without needing to meet other eligibility or preference requirements. If the next available unit is not acceptable to the person in need of a transfer, they will be offered additional CoC- or ESG-funded units as they become available. ESG housing providers must maintain records on emergency transfers requested under 24 CFR 5.2005(e). They also must be kept confidential and secured. Documentation of emergency transfer requests can be completed using the optional [HUD Form 5383](#).

HUD Form 5383 (published in 12/2016) is a document produced by HUD and is an Emergency Transfer Request for Certain Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking.

The purpose of the form is for any victim of domestic violence, dating violence, sexual assault, or stalking, who is seeking an emergency transfer. It allows persons requesting an emergency transfer to use the form to request an emergency transfer and certify that they meet the requirements of eligibility for an emergency transfer under the Violence Against Women Act (VAWA).

All ESG rental assistance activities must provide applicants and participants the ESG [Notice of Occupancy Rights Under the Violence Against Women Act \(VAWA\) Form](#). This form satisfies VAWA Final Rule requirements.

Rental assistance programs must provide copies of the HUD Forms to the property owner or manager at the time of lease-up.

Additional Resources on VAWA:

- [Violence Against Women Act \(VAWA\) Resources](#).

- [Violence Against Women Act \(VAWA\) Massachusetts State Law and Housing: An Overview for Housing Providers](#)

Termination and grievance policy requirements are further detailed in *Section K.* of these written standards.

D. Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter;

Emergency Shelter* activities are designed to increase the quantity and quality of temporary shelters provided to homeless people, through the renovation of existing shelters or conversion of buildings to shelters, paying for the operating costs of shelters, and providing essential services.

Emergency Shelter Eligibility.

Eligible individuals or families must be homeless and must meet the following categories of the definition are eligible (categories 1, 2, 3, 4 , as listed below) as defined in 24 CFR 576.2 and Attachment , “Homeless definition” entitled “Criteria for Defining Homelessness”:

The subcategories of the homeless definitions found in 24 CFR 576.2 include:

- 1 Literally Homeless,
- 2 Imminent Risk of Homelessness
- 3 Homeless Under Other Federal Statutes-
- or 4- Fleeing/Attempting to Flee Domestic Violence Prioritization.

The Emergency Shelter Services component of ESG, as specified in 24 CFR 576.102, may be used to provide essential services to homeless families and individuals in emergency shelters, to renovate buildings to be used as emergency shelter for homeless families and individuals, and to operate emergency shelters. Services generally consist of 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.

Day Shelter expense are eligible as well for individuals who are literally homeless. A day shelter provides temporary shelter for homeless persons in general or specific subpopulations of the homeless, during the day, and does not require occupants to sign leases or occupancy agreements. Also at a minimum, homeless persons served must be able to stay in the facility for as many hours as it is open.

*(Refer to 24 CFR §576.102 for additional details).

HUD requires ESG beneficiaries to be processed through the CoC standard centralized or coordinated assessment system. Per 24 CFR 576.400 (d) once the Continuum of Care has developed a centralized assessment system or a coordinated assessment system in accordance with HUD, each ESG funded program or project within the Continuum of Care’s area must use that assessment system. ESG and CoC-funded programs or projects within the Continuum of Care's area are required to use that system’s coordinated entry process and structure.

In this case, the Massachusetts Balance of State Continuum of Care (BoS CoC), which is also the

Continuum of Care that the City of Lowell falls under, has developed a centralized and coordinated assessment system. It has been developed and is in use for the intake of homeless persons and households. Therefore, the City of Lowell also uses the Massachusetts Balance of State Continuum of Care (BoS CoC) Coordinated Entry System, to facilitate the process of assessing the housing needs of individuals experiencing homelessness and meeting those housing needs.

As noted in the prior section, City of Lowell Department of Planning and Development requires that ESG subrecipient providers of Street outreach, Emergency Shelter, and Rapid Re-housing use the Massachusetts Balance of State Continuum of Care (BoS CoC) Coordinated Entry System. **A more detailed overview of the coordinated intake process is explained in the following section E of the written standards.**

E. Policies and Procedures for Coordination among Emergency Shelter Providers, Essential Service Providers, Homelessness Prevention and Rapid Re-Housing Service Providers, Other Homelessness Assistance Providers, and Mainstream Service and Housing Providers.

Overview

The State of Massachusetts Executive Office of Housing and Livable Communities (EOHLC) administers and manages the Balance of State CoC. The MA BoS CoC uses VESTA as its standard Homeless Management Information System (HMIS) for CoC subrecipients and program beneficiaries. The coordinated entry and HMIS intake process assists with better targeting and serving the needs of homeless persons among providers.

The BoS requires CoC Centralized coordinated intake for homeless persons, meaning that the coordinated entry requirements also apply to subrecipients for the following ESG categories: Emergency Shelter, Street Outreach, and Rapid Rehousing. (These categories provide services to homeless populations). ESG beneficiaries are required to be processed through the standard centralized or coordinated assessment system, pursuant to HUD regulations, 24 CFR 576.400(d). Therefore, the City of Lowell DPD requires ESG providers of Street Outreach, Emergency Shelter, and Rapid Re-housing to use the established CoC Coordinated entry process.

The use of HMIS is also required for all ESG subrecipients. In accordance with HMIS policy, all data must be logged on services provided, referrals, and discharges. The exception is VSP providers who are allowed to use an comparable alternative database and who must not directly input data into HMIS. VSP providers use a separate database from the CoC. However, VSP providers still participate in coordinated entry but don't provide identifying information.

As previously mentioned, the regional CoC HMIS is VESTA. The City of Lowell also follows the coordinated entry (c/e) process that the Balance of State uses. The City of Lowell uses the c/e pertaining to the Northern Middlesex County CoC region within the MA Balance of State service area. The attached map shows the Balance of State CoC service area. The appendix of this document includes a map of it further narrowed down Northern Middlesex County CoC region.

The Balance of State Coordinated Entry System that the City of Lowell also uses is summarized below.

The following is a basic summary of the process.

- Providers use VESTA HMIS to enter data during client intake.

- The VESTA HMIS then prompts the use of a Coordinated Entry (CE Quick Screen, CE Assessment, and the Housing Preferences form).
- VESTA then automatically calculates HMIS data from those screens/assessments, and forms. It includes but is not limited to vulnerability and need factors such as length of time of homeless and the responses to the CE Assessment.
- After that, the Coordinated Entry Housing Navigator uses VESTA prioritizations to match clients and make referrals to a specific housing opportunity. This is usually in the order of most to least vulnerable.

Prioritization Process in Detail

Coordinated Entry users in the Northern Middlesex County region of the BoS CoC use a centralized coordinated intake process which assists to match participants to appropriate resources based on individual needs and preferences. Priority for housing opportunities are determined through the use of the Coordinated Entry Quick Screen, Coordinated Entry Assessment, and Housing Preference Form which are built into the CoC’s HMIS, VESTA. The system prioritizes by screening for basic eligibility and housing preferences, and then prioritizes participants for housing openings based on their vulnerability score and the region of their choice.

Referrals for *permanent supportive housing, transitional housing, and rapid rehousing* are prioritized by the outcome of this assessment which provides a vulnerability score based on the answers to a series of standardized questions. [Note that this process does not include homeless prevention housing stabilization. At the time, that category is not centrally coordinated nor prioritized by Coordinated Entry process. Homeless Prevention prioritization will be addressed in later sections of the ESG written standards].

The following is a more detailed summary of the coordinated entry system prioritization used by the Northern Middlesex County region of BoS CoC and where the City of Lowell ESG providers provide services with the Balance of State CoC area.

1. CE Quick Screen only refers homeless households who are the most vulnerable and the least likely to self-resolve into the CES. By not requiring all interested parties to complete a full CE Assessment, this step saves staff and participant’s time.
2. Participants with the highest CE Assessment scores are deemed to be the most vulnerable and will be prioritized for all Permanent Supportive Housing opportunities. This approach ensures an appropriate match between the most intensive services and the people least likely to succeed with a less intensive intervention.
3. Participants with mid-range CE Assessment scores will be prioritized for CoC and ESG-funded Rapid Re-Housing projects that provide moderate to intensive services and/or a longer enrollment period.
4. Participants may be eligible to receive Emergency Solutions Grant (ESG)-funded “Light Touch” Rapid Re-Housing resources based on their need for short-term housing resources as indicated in their CE Assessment and prioritized based on having secured housing. *If there are not enough ESG resources to accommodate all eligible applicants, the remaining resources are targeted to those with the highest CE score.*
5. If two or more homeless households within the same geographic area are identically prioritized for the next available unit, the CoC selects the household with the greatest length of

time homeless in the determination of which household receives a referral to the next available unit. The CoC's selection would also be based on the household who is document ready and respond first.

This comprehensive approach to the targeting of housing resources is designed to reduce the average length of episodes of homelessness and result in better housing outcomes for all. Participants targeted for Permanent Supportive Housing based on their CE score may be offered a less service intensive housing resource (e.g., transitional housing or Rapid Rehousing) if deemed appropriate to address concerns over the excessive length of the waitlist for Permanent Supportive Housing.

Use of Coordinated Entry for Homelessness Prevention Services

*Currently, the coordinated entry process does not include persons/ households who seek homeless prevention screening and assessment. Separate access point(s) for homelessness prevention are allowed outside of the CoC centralized coordinated intake structure so that people at risk of homelessness can receive urgent services when and where they are needed. This allows homeless prevention entry, referral, and assessment for additional flexibility to address quickly changing needs. Once a centralized entry process is established by the BoS CoC, the City of Lowell will also follow the same process.

The next section of these written standards details the policies and procedures for prioritizing homeless prevention and rapid re-housing assistance.

F. 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;

1. Introduction

Introduction Rapid Rehousing:

As noted in prior sections, when providing intake for persons who are already homeless, the centralized coordinated intake process shall be used to prioritize assistance. This is because there is already a CoC intake process in place for prioritizing referrals for permanent supportive housing, transitional housing, and rapid rehousing. Therefore, this should be used for Rapid Rehousing.

Introduction Homeless Prevention:

Lowell has a network of providers that works with homeless and at-risk homeless populations in the city. In the past, feedback from service providers who provide services in the City of Lowell relating to homeless prevention and rapid rehousing have indicated that Homelessness Prevention and Rapid Rehousing Programs (HPRP) ESG funding would best serve the local community if funding remains as flexible and open as possible. Department of Planning and Development staff will update these priority areas as more data is gathered on the needs, trends and patterns in the homeless and at-risk homeless in the community.

Also, as previously stated, for Homeless Prevention there is no centralized coordinated intake process. Until then the City of Lowell DPD is aware that the needs of persons and families who risk of homelessness can fluctuate quickly, therefore there will be some flexibility for providers in their process for prioritizing who will be served. If and when the Balance of State CoC creates a centralized coordinated intake process applicable to homeless prevention providers and clients, the City of Lowell DPD will incorporate that process into the ESG written standards.

ESG Homelessness Prevention Program Subrecipients (providers) are responsible for screening and determining eligibility for homelessness prevention but must also meet the minimum standards as set forth by 24 CFR 576.103, 105, and 106 (Homeless Prevention Component, Housing Relocation & Stabilization Services, and Short-term and Medium Terms sections of the ESG Interim Rule) and must follow the minimum standards set forth in the written standards of this document. Please see below.

The following includes guidance on minimum standards including priorities for providing Homeless Prevention and Rapid Re-housing assistance.

Homeless Prevention Prioritization guidance

It is recommended that the highest priority applicants for homelessness prevention would be those living in a habitable unit but who have been notified in writing that they are being evicted within twenty-one (21) days after the date of their application for assistance. This is because homeless prevention occurs before a household falls into homelessness.

Eligibility for ESG services must be based on the meeting the definition of “at risk of homelessness” established by HUD. (See Attachment 2. Homeless Definition- Criteria for Defining at Risk of Homelessness). Households who do not meet the required ESG eligibility standards are not eligible for services.

Also, participants receiving City of Lowell ESG Homeless Prevention assistance must be currently housed within the City of Lowell geographic area limits but can be re-housed outside of the City Lowell limits as long as it is located within the Balance of State service area. The purpose of this is to allow for me flexibility with housing placement especially given the high rental costs and limited housing units available within Lowell.

Rapid Rehousing Prioritization Guidance

People or persons assisted with rapid re-housing must be *literally homeless*. Please refer to Attachment 1. for the *Definition of Homelessless*.

As noted in *section E* above, the BoS Centralized Coordinated Entry system prioritizes homeless clients for re-housing resources using HMIS.

If the prioritization results are still unclear after the HMIS intake process, the highest priority applicants for rapid re-housing placement should be those currently homeless persons for whom a potential living unit has been identified and will be available in less than a month.

Beneficiaries of City of Lowell’s ESG Rapid Rehousing may be housed outside of Lowell as long as the housing unit is located within the Balance of State service area. Please refer to Appendix which shows the attached map Massachusetts Balance of State – Continuum of Care Service area.

2. Minimum Requirements

The minimum requirements required to administer *housing stabilization and relocation services* are listed below:

- To be eligible for homeless prevention assistance by the provider, the owner must provide a copy of any eviction action or a notice in writing requiring the program participant to vacate the rental unit.

- All clients receiving direct financial assistance and assistance with rental payments must provide their case manager with a copy of their lease or rental agreement to be kept on file.
- The provider must make rental assistance payments only to an owner listed in the rental assistance agreement *i.e no direct payments may be made to clients seeking rental assistance*. ESG funds used to pay direct assistance must be issued to a third party.
- Financial assistance cannot be provided to persons who are already receiving the same type of assistance through other public sources. For instance, rental assistance cannot be provided to a person who is receiving tenant-based rental assistance or living in a housing unit receiving project-based rental assistance.
- All housing must be determined to meet HUD’s minimum standards and requirements for habitability, sanitation, lead-based paint, and rent reasonableness.
- ESG Rapid Re-Housing and Homelessness Prevention Housing units where participants receive ESG rental assistance must meet BOTH rent reasonableness standards AND HUD’s published Fair Market Rent (FMR) standards.

3. Fair Market Rent (FMRS)

According to HUD policy, rental assistance cannot be provided if the rent exceeds the Fair Market Rent (FMR). established by HUD and must comply with HUD’s standard of rent reasonableness. Gross Contract rent, which includes fees, rent, and utility allowance, cannot exceed the FMR. The FY2024 Lowell Metro Area HUD Metro Fair Market Rents (FMRs) became effective in 2023 and are listed below.

FMRs established by HUD are posted and updated every year. They may be found at the following website.:

<https://www.huduser.gov/portal/datasets/fmr.html>

Final FY 2024 FMRs By Unit Bedrooms for Lowell Metro Area

- Efficiency \$1,369
- One Bedroom \$1,518
- Two Bedroom \$ 1,995
- Three Bedroom \$2,412
- Four Bedroom \$ 2,657

At the start of the program year the city will provide technical assistance on using the income calculator and rent reasonableness.

Note: Rent reasonableness and FMR requirements do not apply when a program participant receives only financial assistance or services under Housing Stabilization and Relocation Services. This includes rental application fees, security deposits, an initial payment of “last month’s rent,” utility payments/deposits, and/or moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, legal services, and credit repair. (Note: “Last month’s rent” may not exceed the rent charged for any other month; security deposits may not exceed 2 months’ rent.)

4. Income Requirements

All programs should review income at intake to evaluate a client’s resources and determine the level of assistance that will be the most helpful.

When providing Homelessness Prevention assistance, at initial entry to the program a household must have income below 30 percent of median family income for the area to be eligible for assistance. Income is also reviewed at time of program re-evaluation for both homelessness prevention and ESG rapid re-housing.

When determining the annual income of an individual or family, the provider must use the Part 5 standard for calculating annual income under 24 CFR 5.609 ([eCFR :: 24 CFR 5.609 -- Annual income.](#))

Providers must calculate income using the HUDs income calculator found here:

<https://www.hudexchange.info/incomecalculator/>

The following section addresses two ESG written standards requirements:

G. 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; and

H. Standards for Determining How Long a Particular Program Participant will be provided with Financial Assistance and whether and How the Amount of that Assistance will be Adjusted Over Time

1. Introduction: Types of eligible RRH and HP assistance

Homeless Prevention activities are intended to prevent individuals and families from moving into an emergency shelter or place described in paragraph (1) of the “homeless” definition in 576.2.

Rapid Re-housing activities are intended for homeless individuals/ households to move as quickly as possible into permanent housing and achieve stability in that housing.

A summary of eligible types of assistance are listed in the table below.

TABLE 1. ESG-RRH AND HP TYPES OF ASSISTANCE
Rental Assistance <ul style="list-style-type: none">• Short-term rental assistance (up to 3 months)• Medium-term rental assistance (4-18* months)• Rental arrears (one-time payment of up to 6 months of rent in arrears, including any late fees on those arrears)

<p>Financial Assistance</p> <ul style="list-style-type: none"> • Security deposits (up to 1 month) • First and last month’s rent (up to 1 month for each type) • Rental application fees • Utility deposits and payments (up to 18* months, including up to 6 months of arrears) • Moving costs
<p>Supportive Services</p> <ul style="list-style-type: none"> • Housing search and placement • Housing stability case management • Mediation • Legal services • Credit repair

*The 18 month limitation is set forth by City of Lowell DPD

This is not an exhaustive list. Refer to Regulations at 24 CFR 576, subpart B of the [ESG Interim Rule](#) for additional details on allowable expenditures.

2. Time Limits per type of Assistance- ESG RRH and HP

Table 2. Assistance type	Time limits
Housing relocation & stabilization services	
Financial Assistance Cost*:	
Rental application fee	One time.
Security Deposits	Not to exceed 1 month of rent. In addition, the amount cannot exceed the FMR rate for the area.
First and Last Month’s Rent	1 month (per type). In addition, this amount must be calculated in the program participant’s total rent assistance. Total rent assistance cannot exceed 18** months during any 3 year period per client/ household assisted.
Utility Deposits	One time fee.
Utility Payments Utility arrears	Utility Payments: Not to exceed 18** months per 3 years per client / household assisted.

	Utility arrears: Not to exceed 6 months and must be a one time payment.
Moving Costs	3 Month Limit on Storage fees. This is only eligible for participants who have secured a housing unit to live in. Amount not to exceed \$2,000.
<u>Other Types of Housing Relocation & Stabilization Services Assistance:</u>	
Services Costs:	
Housing Stabilization Case Management/Supportive Services	<i>Assistance beginning at 30 days prior to move in is allowed. Up to 18** months of this type of assistance is allowed per each 3 years per client/ household assisted.</i>
<u>Short and Medium Term Rental Assistance:</u>	
Rental Assistance	<i>Short term assistance as defined by the HUD ESG definition must not exceed 3 months of rent.</i> <i>Medium term rental assistance is more than 3 month and must not exceed 18** months during any 3 year period per client/ household assisted.</i>
Rental Arrears	1 time payment of up to 6 months. This includes any late fees due at that time. <i>This amount and time period does not count toward the rental assistance limit.</i>

* Types of costs as listed under *Financial Assistance Costs*, a listed under 24 CFR 576.105.

* 18 month limitation is set forth by City of Lowell DPD.

See Regulations at 24 CFR 576, subpart B of the [ESG Interim Rule](#) for additional details on allowable expenditures.

3. Share of Rental Payments paid by Program Participants

The City of Lowell will not mandate that clients (program participants) who are receiving ESG assistance pay a specific portion of their total rent with other sources. That will be up to the discretion of the providers to determine for their programs and when possible, on a case by case basis. Also, an initial

evaluation is required for all program beneficiaries and stability and long-term plans shall be considered.

The participants' share of rental payments should ideally increase incrementally throughout the period of assistance to better prepare program participants towards self-sufficiency and to avoid becoming overburdened with financial costs once the assistance ends. Clients provided with this type of assistance must be receiving case management services (either through ESG or an alternative homelessness program) and must have a workable plan in place to become self-sufficient once the subsidy benefit expires. This plan is to be documented in the client's individual case file.

Program participants should be encouraged to come up with sustainable ways to supplement this financial assistance. The participants' share of rental payments should ideally increase incrementally throughout the period of assistance to better prepare the participant towards self-sufficiency and to avoid feeling overburdened once assistance ends. For example, hardship waivers to reduce or forgo contributions can be granted in extreme circumstances at the discretion of the case manager and/or agency. Requests for waivers would be reviewed and approved by a supervisor, with the appropriate documentation kept on file.

4. Initial Evaluation and Re-evaluation Requirements for ESG Rapid Re-Housing and Homelessness Prevention

An initial evaluation must be conducted at the beginning of service, upon entry to a program.

At a minimum, each evaluation of eligibility must establish that the program participant does not have an annual income that exceeds 30 percent of median family income for the area, as determined by HUD, and that the program participant lacks the resources and support networks necessary to retain housing if not but for ESG assistance. Also, case management providers to the maximum extent possible must attempt to connect program participants to mainstream and other resources.

For **Homeless Prevention**, one evaluation is required at initial intake and re-evaluation(s) must be conducted every three months thereafter. that the project application meets the criteria of homeless, as defined by the homeless definition. It must be determined that the project applicant meets the is eligible for assistance as defined as at "risk of homeless" or who meet the criteria in paragraph 2, 3, or 4 of the homeless definition. *Please refer to ESG Interim Rule regulations, 24 CFR 576.2. [Definitions](#) (also found and defined in the HUD Consolidated Plan regulations [Definitions](#), 24 CFR 91.5.,).*

For **Rapid Re-housing participants**, one initial evaluation is also required.

It includes entry into HMIS and establishing that the project application meets the criteria of homeless, as defined by the homeless definition.

Under the **Rapid Re-housing** eligible ESG category, program participants who "homeless" as defined in the ESG Interim Rule regulations, 24 CFR 576.2. [Definitions](#) qualify for assistance. Attachment 1. Definition of Homelessness and Record Keeping Requirements provides further guidance on record keeping requirements.

For rapid re-housing participants, after the first initial evaluation, a re-evaluation of program participant status (re: eligibility) is required no more than annually. If during re-evaluation the program

beneficiary is no longer eligible, assistance will no longer be provided to applicant for the next eligible period.

5. Limits on Assistance (Financial, Housing Stabilization & Relocation Services)

See *tables 1 and 2* in the previous section for a summary of limits on assistance by type of eligible activity.

The following are details on eligible *Housing Stabilization Financial Assistance*:

1. **First and Last Month's Rent**: **One-time payments not to exceed two months of rent** can be made available using ESG funds to cover first and last month's rent for eligible individuals or families moving into a new residence. The amount for each month must also **falls at or below the FMR limits for that time period**.
2. **Rental application fee**. See Table 2.
3. **Security Deposits**: **One-time payments not to exceed one month** can be provided to cover security deposits for homeless individuals or families moving into a new residence. The amount must also fall at or below the FMR limits for that time period.

Please note: Security deposits must be returned to the organization when the assisted tenant leaves the unit. Because of this requirement, organizations must maintain accurate records of all security deposits provided to clients. A "good faith effort" must be made to recover program funds upon the departure of the beneficiary from the unit.

4. **Moving Costs**: **One-time payments not to exceed \$2,000 per client** can be provided to cover moving costs for *homeless* individuals or families moving into a new residence *or* households at *risk of homelessness* who will move into a new unit that will provide increases chances at housing stability. Funds may be used for reasonable moving costs, such as truck rental or hiring a moving company. Payments in this category can only be paid to a third party.
5. **Utility Deposits and Payments**: One-time payments. Funds may be used for reasonable utility deposits only if necessary to move into a new residence. Payments in this category can only be paid to a third party (e.g. the utility company).
6. **Utility Arrears***: Utility arrears can be covered using ESG funds if and when paying such arrears will allow program participants to stay in their home (homeless prevention) or clear their record to allow them to move into a new unit that will offer more stability (homeless prevention / rapid rehousing). Each eligible client or family can be provided **up to six (6) months of back- utilities** for the purpose of preventing homelessness or rapidly rehousing the person/ household. This form of assistance is only to be made available on a **one- time basis per client/ household/ each consecutive 3 years**.

**Please note*: Sub-grantees using ESG funds for payment of a client's back-utilities should negotiate with landlords and utility companies to forgive or reduce the arrearage payment. Staff should document all attempts to reduce arrearages on behalf of the program participant in the case files.

The following are details on Short-term and Medium-term Rental Assistance:

Homeless Prevention Short-term and Medium-term Rental Assistance

1. Short- or Medium-Term Rental payments:

Short- or medium-term rental paid by ESG funds should only be used to cover a portion of the client's total rent. As stated in a prior section of the written standards, the percentage of rent covered by ESG funds is to be determined by the case manager and should include considerations of the client's long-term prospects for becoming self-sufficient.

Rent payments can only be provided during the program year of the grant (typically July 1 through June 30) unless the organization requests an extension of which up to 6 additional months is allowed OR if 2 consecutive ESG grants are awarded for the same eligible activities to the same organization and program. This is only restricted to City of Lowell ESG-funded activities.

Please note that short term payments are defined by HUD as up to 3 months' rent assistance. Medium term payments are defined by HUD as up to 24 months of rental payments. However, the City of Lowell ESG written standards limit the time to 18 months for medium term rent.

2. Late Payments/ Arrears:

Rental Arrears*: Rental arrears can be covered using ESG funds if and when the provision of these funds will allow clients to stay in their homes (homeless prevention) or clear their record to allow them to move into a new unit that will offer more stability (homeless prevention / rapid rehousing). ESG funds that are provided for this cost-type are only to be made on a **one-time basis per client or household** every 3 years. It **can only cover up to six (6) months of back-rent.**

**Please note:* Sub-grantees using ESG funds for payment of a client's back-rent should negotiate with landlords and utility companies to forgive or reduce the arrearage payments especially for homeless prevention clients given that there is already an established relationship with the existing landlord. A 10% reduction is suggested. Staff should document all attempts to reduce arrearages on behalf of the program participant in the case files.

I. Standards for Determining the Type, Amount, and Duration of Housing Stabilization and/or Housing Relocation Services to Provide a Program Participant

ESG funds can be used to cover costs associated with providing *at-risk of homelessness clients* or *homeless* clients with housing relocation and stabilization services.

1. Eligible types of ESG Housing relocation and Stabilization services costs

Eligible types of services include the following:

- Housing search and placement
- Housing stability case management
- Mediation
- Legal services
- Credit repair

[Please refer to 24 CFR 576.105 Housing relocation and stabilization services](#) for an extensive list.

3. The Table below provides a summary of the limits on the duration of assistance.

Table 3. Other Types of Housing Relocation & Stabilization Services Assistance:	Time limitation
<p>Housing Relocation & Stabilization Services Assistance -Services Costs:</p> <p><i>Supportive Services- Housing Search and Placement</i></p> <p><i>Other eligible service cost</i></p>	<p>30 days prior to move in + up to 24 months in 3 years .</p> <p>24 months is the maximum and if only the agency that receives ESG funds is awarded twice consecutively, 2 program years in a row. Otherwise, the limit is 12 months for the program year with a possibility of 6 month extension to the grant.</p> <p><i>No dollar amount cap. However, subrecipients must adhere to the budgets specified in the grant agreements with the City of Lowell.</i></p>

4. Details on types of ESG Housing relocation and Stabilization services HP and RRH

Funds may be used for participants qualifying as “at-risk” of homelessness (homeless prevention) or “homeless” participants (rapid rehousing).

Types of Eligible Services: Homeless Prevention

- Housing Search and Placement

Funds may be used for services or activities designed to assist individuals or families in locating, obtaining, and retaining suitable housing. Component services or activities may include: tenant counseling; assisting individuals and families to understand leases; securing utilities; making moving arrangements; representative payee services concerning rent and utilities; mediation and outreach to property owners related to locating or retaining housing.

- Housing Stability Case management

Funds may be used for activities for the arrangement, coordination, monitoring, and delivery of services related to meeting the housing needs of program participants and helping them to remain stably housed. Under this category, case managers should work with eligible clients to formulate a long-term plan for maintaining stable housing.

Activities may include: counseling; developing, securing, and coordinating services; monitoring and evaluating program participant progress; mediation between program participant and property owner to avoid evictions and helping program participants with legal rights to avoid losing permanent housing where participant resides; developing an individualized housing and service plan, including a path to permanent housing stability subsequent to ESG financial assistance. It also includes initial evaluation with the participant and ongoing evaluations, centralized coordinated assessment and intake, and referrals.

Other Services:

Mediation. ESG funds may pay for mediation between the program participant and the owner or person(s) with whom the program participant is living, provided that the mediation is necessary to prevent the program participant from losing permanent housing in which the program participant currently resides.

Legal services. ESG funds may pay for legal services, as set forth in § 576.102(a)(1)(vi), except that the eligible subject matters also include landlord/tenant matters, and the services must be necessary to resolve a legal problem that prohibits the program participant from obtaining permanent housing or will likely result in the program participant losing the permanent housing in which the program participant currently resides.

Credit repair. ESG funds may pay for credit counseling and other services necessary to assist program participants with critical skills related to household budgeting, managing money, accessing a free personal credit report, and resolving personal credit problems. This assistance does not include the payment or modification of a debt.

For an extensive list of *eligible Homeless Prevention and Stabilization- Services Costs*, refer to 24 CFR 576.105(b).

Rapid Re-Housing Services:

Rapid Re-housing related housing stabilization services may be used to cover costs for homeless clients who need to move into housing.

Eligible services are nearly the same as those listed above for homeless prevention with the difference being who is eligible for rapid re-housing assistance.

Please see the section above for eligible activities.

For extensive details on Housing Relocation and Stabilization Services costs eligible under either the Homeless Prevention or Rapid Rehousing components, refer to [24 CFR 576.105](#) of the ESG Interim Rule.

J. HMIS Requirements

Homeless Management Information System (HMIS) means the information system designated by the Continuum of Care to comply with the HUD's data collection, management, and reporting

standards and used to collect client-level data and data on the provision of housing and services to homeless individuals and families and persons at-risk of homelessness.

For the City of Lowell, the Continuum of Care uses VESTA as the information system for the service area.

Pursuant to 24 CFR 576 400 f., the recipient [City of Lowell DPD] must ensure that data on all persons served and all activities assisted under ESG are entered into the applicable community-wide HMIS in the area [Vesta] in which those persons and activities are located, or a comparable database, in accordance with HUD's standards on participation, data collection, and reporting under a local HMIS. If the subrecipient is a victim service provider or a legal services provider, it may use 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.

Therefore, all ESG funded projects must collect and record data into HMIS with the exception of VSP and legal services providers. It is necessary to determine at a minimum: (1) unduplicated counts of the number of homeless individuals and families accessing service; (2) demographic characteristics of homeless individuals and families; and (3) patterns of service use within the community. Only Victim Services Provider (VSP) agencies and legal service agencies are allowed to operate a comparable database. In that case, the exempt agency must keep records of participation in a comparable database. HMIS data entry is also an important aspect in the intake process and prioritization process for homeless persons to better match them to available resources for homeless providers in the region. HMIS participation requirement details as set for by the ESG Interim Rule can be found [here](#) in 24 CFR 576.400(f).

K. Other Requirements

Confidentiality Requirements: Encompasses the secure management and storage of distinct client information, such as names and unique personal identifying codes, within all documentation associated with individuals or families applying for ESG assistance.

In accordance with the ESG federal regulation outlined in 24 CFR 576.400(2), it is imperative to maintain the confidentiality of specific client details, including names and unique personal identifying codes, as well as any other individual information present on documents.

All documents containing personally identifying information related to individuals or families applying for and/or receiving ESG assistance are required to be securely stored, ensuring their confidentiality and protection.

Providers are further obligated to establish and adhere to written confidentiality procedures. The minimum requirements for these procedures are as follows, aiming to provide clear guidance and assurance in safeguarding sensitive information.

Written confidentiality procedures to ensure:

- ◆ The confidentiality of all personally identifying information for individuals or families seeking or receiving ESG assistance will be ensured.

- ◆ The public disclosure of the address or location of ESG-assisted domestic violence, dating violence, sexual assault, or stalking shelter projects is prohibited, except with written authorization from the shelter operator.
- ◆ The public release of the address or location of housing occupied by a program participant is restricted, unless permitted by the provider's pre-existing privacy policy and in accordance with applicable state and local privacy laws and confidentiality obligations.

Additional City of Lowell ESG Program Requirements

As the City of Lowell does not provide direct assistance to persons utilizing ESG assistance, the need for confidentiality procedures is based on maintenance of records and monitoring of project sponsors administering ESG funded programs. To ensure that the client’s confidentiality as it relates to his or her homelessness status, the following requirements must be adhered to:

Monitoring:

The address or location of any shelter project supported by the ESG for domestic violence, dating violence, sexual assault, or stalking will not be disclosed publicly unless authorized in writing by those responsible for the shelter's operation. Monitoring of project sponsor’s compliance with confidentiality will consist of reviewing the following:

- The written confidentiality policy of the project sponsor, privacy statements related to data systems, the consent process, and staff training opportunities.
- Reviewing participant files to verify the presence of signed confidentiality policies or documentation indicating awareness of the organization's policy. Additionally, confirming the existence of signed release forms allowing the disclosure of confidential information, demonstrating eligibility for and securing necessary services.
- Examining materials utilized for communication with landlords, such as checks, envelopes, letterhead, etc. This includes checking for logos, agency names, or any other information that could unintentionally reveal the participant's homelessness status to a third party.

While the City of Lowell retains the authority to examine participant information for program eligibility, standard precautions will be taken to minimize the potential for confidentiality breaches. This entails refraining from creating copies of client information during monitoring activities, avoiding the removal of documentation from the project sponsor's offices, and abstaining from transmitting client information through fax or email.

Apart from the mandatory HMIS entry, HUD necessitates ESG recipients to report through Sage. Consequently, subrecipients, i.e., providers receiving ESG funds, are obligated to input HMIS data into Sage when it is stipulated. This obligation occurs once annually.

Obligation of ESG Sub Recipient Providers:

An ESG assisted organization is responsible for establishing confidentiality procedures for its programs.

This policy at a minimum should address the following:

- Concerns pertaining to the behavior of staff and participants concerning confidentiality.
- The procedure for obtaining consent to release confidential information.
- Guidelines for handling breaches of confidentiality by both staff and participants.
- Privacy norms governing the collection and utilization of participant information for program reporting, such as HMIS.

Additional Minimum Standards

An ESG assisted organization is responsible for establishing policies and procedures for its ESG assisted programs.

They should address the following:

- Nondiscrimination, Equal Opportunity, Affirmative Outreach, and Fair Housing
- Faith-Based Activities
- Termination Policies
- Grievance Policy
- Conflicts of Interest
- Prohibition Against Family Separation

1.Termination Policy Necessity:

- Each provider of housing assistance must have a termination policy in place.
- The focus is on the Housing First approach, prioritizing assistance to households in the most need.

2.Avoiding Unnecessary Termination:

- Providers are encouraged to avoid unnecessarily terminating assistance for program violations, except in extreme cases.
- Dismissal policies should not terminate assistance solely for program rule infractions if alternatives can address the issues.
- Examples include not terminating assistance solely due to substance use, refusal of treatment, or incomplete implementation of a housing plan.

3.Proactive Engagement and Service Delivery:

- Instances of rule infractions provide opportunities for proactive, progressive engagement, and improved service delivery.
- Instead of immediate termination, providers should engage in further support and assistance.

4.Judgment and Extenuating Circumstances:

- Providers must exercise judgment and consider all extenuating circumstances when determining if violations warrant termination.
- Termination should only occur in the most severe cases.

5.Termination Not a Permanent Bar:

- Termination of assistance does not permanently bar the provider from offering further assistance to the same family or individual in the future.

6.Effective Communication:

- Providers must effectively communicate termination and grievance procedures to program participants.
- Participants should fully understand the procedures related to termination.

7.Inclusion in Agency Regulations:

- All subrecipients (those receiving funds from the main provider) must include termination policies and procedures in their agency regulations and manuals.

8. Documentation Compliance:

- Documentation of termination of assistance must comply with the requirements outlined in 24 CFR 576.402.

To ensure effective communication for emergency shelter agencies and participants, City of Lowell DPD requires the following actions prior to program termination:

- At least one meeting (can occur virtually or via phone) with the participating household discussing program violations.
- A written plan for rectifying program violations including action steps for both agency staff and program participants

Grievance Policy

All participating provider agencies must have a client grievance policy in place, a copy of which should be made available to clients. This policy should be available to address grievances involving a provider's internal policies, services or activities. In the event a grievance is received regarding a provider's internal policies, services or activities, the grievance will be referred to the appropriate agency for resolution under the provider's internal grievance policy. Each provider must make a good faith effort to resolve client grievances as best they can in the moment. Complaints that should be addressed directly by the provider staff member or supervisor include complaints about agency conditions, how the client was treated by provider staff, and violations of confidentiality agreements. If the client feels the complaint was not adequately addressed, the client should then follow the provider's internal grievance procedure.

All projects must comply with the Fair Housing Act (including Equal Access and Family Separation), the Equal Access to Housing in HUD Programs Regardless of Sexual Orientation or Gender Identity regulations, and the Americans with Disabilities Act regulations. All providers should establish organizational policies to ensure that all federal laws are followed in the administration of homelessness prevention and rapid re-housing services. Refer to the section entitled Organizational Policies and Other HUD Requirements for further details.

L. Payment Requests Guidance

ESG funds are disbursed as reimbursement only; grant funds are paid to grant recipients based on actual expenditures. The agency must first expend its own funds on the "activities" as approved in the Grant Agreement between the City of Lowell Department of Planning and Development and the respective Agency, and then submit appropriate documentation as a Request for Reimbursement.

Payment requests must include the following supporting documents:

- Supporting documentation for all costs charged to ESG grant ("source documentation");
- Documentation showing ESG funds were spend on allowable costs in accordance with the requirements for eligible activities 24 CFR 576 and costs principles 2 CFR Part 200
- Timesheets and time allocation for all personnel paid for ESG funding;
- General Ledger (also know as Transaction Detail by Account). *Note that if your agency does not have a general ledger, you will be required to provide detailed source documentation such as proof of ACH, remittance advice or advice, copy of cleared check/ bank statement with relevant expenses highlighted);*

- Documentation of receipt of and use of program income;
- Documentation of receipt of and use of matching funds; and
- Copies of any procurement/ professional services/ contracts that are paid with ESG funds.

Subrecipient agencies must have:

- a. Adequate accounting records that provide reliable, complete and up-to-date information about sources and uses of funds, including retention of “source documentation” (receipts, invoices, cleared checks, vouchers, etc.) for all financial transactions.
- b. Adequate internal controls that warrant against misuse of funds or unallowable expenditures (at least two persons review each financial transaction – one requesting/justifying the expenditure, the other approving for payment);
- c. A bank account in the name of the agency; and
- d. Any checks that are made payable to any Board Member or the Executive Director (reimbursements, mileage, payroll, etc.) MUST be signed by a Board Member authorized as a check signer by the Board of Directors, and the payee and pay or must be different individuals.

Found in the attachments of this document, Attachment 5, is a blank copy of the payment request form that must be used. It includes a sample transmittal invoice cover sheet that would be found in “Appendix B” of each subrecipient grant agreement. It includes budget summary and approved line items.

Also attached at the end of this document, Attachment 5, is a Budget Spreadsheet for requests for reimbursement for payroll (page 39 of this document).

M. Attachments

1. Definition of Homelessness and Record Keeping Requirements:

- Criteria for Defining Homelessness
- Record Keeping Requirements

2. At-Risk of Homelessness Definition:

- Criteria for Defining Individuals at Risk of Homelessness

3. Homeless Definition Eligibility by Component:

- Criteria for Eligibility Based on Homelessness Definition Components

4. Minimum Habitability Standards & Rent Reasonableness Checklists

5. Payment Request forms

Appendices:

Map 1. Balance of State – Continuum of Care Service area

Map 2. Balance of State- Continuum of Care- North Middlesex region (subregion)

Other Forms

Cares Act

Useful links

- ESG PROGRAM AMENDMENT
- **Homeless Definition Final Rule**
- **HUD Fair Market Rents**
- **ESG Rent Reasonableness and Fair Market Rent Guidance**
- **ESG Program Components Quick Reference**



Homeless Definition

CRITERIA FOR DEFINING HOMELESS	Category 1	Literally Homeless	(1) Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning: <ul style="list-style-type: none"> (i) Has a primary nighttime residence that is a public or private place not meant for human habitation; (ii) Is living in a 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 and local government programs); <u>or</u> (iii) Is exiting an institution where (s)he has resided for 90 days or less <u>and</u> who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution
	Category 2	Imminent Risk of Homelessness	(2) Individual or family who will imminently lose their primary nighttime residence, provided that: <ul style="list-style-type: none"> (i) Residence will be lost within 14 days of the date of application for homeless assistance; (ii) No subsequent residence has been identified; <u>and</u> (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing
	Category 3	Homeless under other Federal statutes	(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: <ul style="list-style-type: none"> (i) Are defined as homeless under the other listed federal statutes; (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application; (iii) Have experienced persistent instability as measured by two moves or more during in the preceding 60 days; <u>and</u> (iv) Can be expected to continue in such status for an extended period of time due to special needs or barriers
	Category 4	Fleeing/ Attempting to Flee DV	(4) Any individual or family who: <ul style="list-style-type: none"> (i) Is fleeing, or is attempting to flee, domestic violence; (ii) Has no other residence; <u>and</u> (iii) Lacks the resources or support networks to obtain other permanent housing



Homeless Definition

RECORDKEEPING REQUIREMENTS	Category 1	Literally Homeless	<ul style="list-style-type: none"> • Written observation by the outreach worker; <u>or</u> • Written referral by another housing or service provider; <u>or</u> • Certification by the individual or head of household seeking assistance stating that (s)he was living on the streets or in shelter; • For individuals exiting an institution—one of the forms of evidence 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 action notifying the individual or family that they must leave; <u>or</u> • For individual and families leaving a hotel or motel—evidence that 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; <u>and</u> • Self-certification or other written documentation that the individual lack 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 the nonprofit or state or 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 PH 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 or more barriers
	Category 4	Fleeing/ Attempting to Flee DV	<ul style="list-style-type: none"> • <i>For victim service providers:</i> <ul style="list-style-type: none"> ○ 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. Statement must be documented by a self-certification or a certification by the intake worker. • <i>For non-victim service providers:</i> <ul style="list-style-type: none"> ○ 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; <u>and</u> ○ Certification by the individual or head of household that no subsequent residence has been identified; <u>and</u> ○ Self-certification, or other written documentation, that the individual or family lacks the financial resources and support networks to obtain other permanent housing.





At Risk of Homelessness

CRITERIA FOR DEFINING AT RISK OF HOMELESSNESS	Category 1	Individuals and Families	An individual or family who: <ul style="list-style-type: none"> (i) Has an annual income below <u>30%</u> of median family income for the area; <u>AND</u> (ii) Does not have sufficient resources or support networks immediately available to prevent them from moving to an emergency shelter or another place defined in Category 1 of the “homeless” definition; <u>AND</u> (iii) Meets one of the following conditions: <ul style="list-style-type: none"> (A) Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; <u>OR</u> (B) Is living in the home of another because of economic hardship; <u>OR</u> (C) Has been notified that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance; <u>OR</u> (D) Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals; <u>OR</u> (E) Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room; <u>OR</u> (F) Is exiting a publicly funded institution or system of care; <u>OR</u> (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient’s approved Con Plan
	Category 2	Unaccompanied Children and Youth	A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
	Category 3	Families with Children and Youth	An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her.



Homeless Definition

ELIGIBILITY BY COMPONENT (Emergency Solutions Grants Program)	Street Outreach	Individuals defined as Homeless under the following categories are eligible for assistance in SO: <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1) SO projects have the following additional limitations on eligibility within Category 1: <ul style="list-style-type: none"> • Individuals and families 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	Individuals and Families defined as Homeless under the following categories are eligible for assistance in ES projects: <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 2 – Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV
	Rapid Re-housing	Individuals defined as Homeless under the following categories are eligible for assistance in RRH projects: <ul style="list-style-type: none"> • Category 1 – Literally Homeless • Category 4 – Fleeing/Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
	Homelessness Prevention	Individuals and Families defined as Homeless under the following categories are eligible for assistance in HP projects: <ul style="list-style-type: none"> • Category 2 –Imminent Risk of Homeless • Category 3 – Homeless Under Other Federal Statutes • Category 4 – Fleeing/Attempting to Flee DV Individuals and Families who are defined as At Risk of Homelessness are eligible for assistance in HP projects. HP projects have the following additional limitations on eligibility with homeless and at risk of homeless: <ul style="list-style-type: none"> • Must only serve individuals and families that have an annual income <u>below</u> 30% of AMI

HOUSING HABITABILITY STANDARDS INSPECTION CHECKLIST

Emergency Solutions Grant Program (ESG)

ESG Applicant Name: _____

About this Tool

These standards apply only when a program participant is receiving financial assistance and moving into a new (different) unit. Inspections must be conducted upon initial occupancy and then on an annual basis for the term of ESG assistance.

The habitability standards are different from the Housing Quality Standards (HQS) used for other HUD programs. Because the HQS criteria are more stringent than the habitability standards, a grantee could use either standard. In contrast to HQS inspections, the habitability standards do not require a certified inspector. As such, ESG program staff could conduct the inspections, using a form such as this one to document compliance.

Instructions: Mark each statement as 'A' for approved or 'D' for deficient. The property must meet all standards in order to be approved. A copy of this checklist should be placed in the client file.

Approved or Deficient	Element
	1. <i>Structure and materials:</i> The structures must be structurally sound so as not to pose any threat to the health and safety of the occupants and so as to protect the residents from hazards.
	2. <i>Access:</i> The housing must be accessible and capable of being utilized without unauthorized use of other private properties. Structures must provide alternate means of egress in case of fire.
	3. <i>Space and security:</i> Each resident must be afforded adequate space and security for themselves and their belongings. Each resident must be provided with an acceptable place to sleep.
	4. <i>Interior air quality:</i> Every room or space must be provided with natural or mechanical ventilation. Structures must be free of pollutants in the air at levels that threaten the health of residents.
	5. <i>Water Supply:</i> The water supply must be free from contamination.
	6. <i>Sanitary Facilities:</i> Residents must have access to sufficient sanitary facilities that are in proper operating condition, may be used in privacy, and are adequate for personal cleanliness and the disposal of human waste.
	7. <i>Thermal environment:</i> The housing must have adequate heating and/or cooling facilities in proper operating condition.

	8. <i>Illumination and electricity</i> : The housing must have adequate natural or artificial illumination to permit normal indoor activities and to support the health and safety of residents. Sufficient electrical sources must be provided to permit use of essential electrical appliances while assuring safety from fire.
	9. <i>Food preparation and refuse disposal</i> : All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a sanitary manner.
	10. <i>Sanitary condition</i> : The housing and any equipment must be maintained in sanitary condition.
	11. <i>Fire safety</i> : Both conditions below must be met to meet this standard. <ul style="list-style-type: none"> a. Each unit must include at least one battery-operated or hard-wired smoke detector, in proper working condition, on each occupied level of the unit. Smoke detectors must be located, to the extent practicable, in a hallway adjacent to a bedroom. If the unit is occupied by hearing-impaired persons, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom occupied by a hearing-impaired person. b. The public areas of all housing must be equipped with a sufficient number, but not less than one for each area, of battery-operated or hard-wired smoke detectors. Public areas include, but are not limited to, laundry rooms, day care centers, hallways, stairwells, and other common areas.

CERTIFICATION STATEMENT

I certify that I am not a HUD certified inspector and I have evaluated the property located at the address below to the best of my ability and find the following:

- Property meets all of the above standards.
- Property does not meet all of the above standards.

Therefore, I make the following determination:

- Property is approved.
- Property is not approved.

Case Name: _____			
Street Address: _____			
Apartment: _____	City: _____	State: _____	Zip: _____
Evaluator's Signature: _____		Date: _____	
Please Print. Name: _____			
Exec. Dir. Initial: _____			

RENT REASONABLENESS INSPECTION CHECKLIST

Emergency Solutions Grant Program (ESG)

ESG Applicant Name: _____

Checklist/Certification

	Proposed Unit	UNIT #1	UNIT #2	UNIT #3
ADDRESS				
NUMBER OF BEDROOMS				
SQUARE FEET				
TYPE OF UNIT/CONSTRUCTION				
HOUSING CONDITION				
LOCATION/ACCESSIBILITY				
AMENITIES				
UNIT:				
SITE:				
NEIGHBORHOOD:				
AGE IN YEARS				
UTILITIES (TYPE)				
UNIT RENT				
UTILITY ALLOWANCE				
GROSS RENT				
HANDICAP ACCESSIBLE?				

CERTIFICATION:

RENT REASONABLENESS

Based upon a comparison with rents for comparable units, I have determined that the proposed rent for the unit [] is / [] is not reasonable.

NAME:	SIGNATURE:	DATE:
-------	------------	-------

Notes on Determining Rent Reasonableness

HUD's standard for rent reasonableness means that the total rent charged for a unit must be reasonable in relation to the rents being charged during the same period for comparable units in the private, unassisted market and must not be in excess of rents being charged by the owner during the same period for comparable non-luxury unassisted units.

Determination criteria:

- Location
- Quality
- Size
- Type
- Age of unit
- Amenities, housing services, maintenance, and utilities provided by the owner

Comparing rents:

- Market study
- Reviewing comparable units advertised for rent
- Note from property owner verifying comparability of charged rents to other units owned

Reference for Rent reasonableness:

[Huduser.gov/portal/datasets](https://www.huduser.gov/portal/datasets)

Attachment 5. Reimbursement Templates

Payroll Template A

Employee Name	Period Worked	Hours Worked	Rate of Pay	Total		Hours worked ESG	Rate of Pay	Total Amount charged to ESG
John Doe	10/1-10/15	160	\$40.00	\$6,400.00		40	\$20	\$1,600

Above is an example if there are no fringe benefits.

Payroll Template B

	Employee name	Job title	Period Worked	Hours Worked	Rate of Pay	Total Pay	Hours worked ESG	Rate of Pay	Total Pay charged to ESG		Total Fringe benefits	Fringe charged to ESG	**Total salaries PLUS fringe benefits	Total salaries PLUS fringe benefits charged to ESG
Example:	John Doe	case worker	10/1-10/15	160	\$40.00	\$6,400.00	40	\$40.00	\$1,600.00		\$5.00	\$4.00	\$6,405.00	\$1,604.00
						\$0.00		\$40.00	\$-		\$5.00	\$4.00		
Total sum:						\$6,400.00	40		\$1,600.00		\$20.00	\$16.00	\$6,420.00	\$1,616.00

Above is an example if there will be both salaries and fringe benefits charged to ESG.

Attachment 5. Continued.

SAMPLE BUDGET COST CONTROL REPORTING STATEMENT
EMERGENCY SOLUTIONS GRANT PROGRAM
FEDERAL FISCAL YEAR 2023-2024

REPORTING PERIOD: _____

CONTRACT DATE: 07/01/2023 ~ 06/30/2024

AGENCY/PROGRAM: Homeless Agency / Emergency Shelter

AGENCY ADDRESS: Lowell, MA 01852

PURCHASE ORDER #: _____

VENDOR #: _____

<i>Eligible ESG Costs</i>	Total Amount Budgeted	Total for Month	Total Previous Month(s)	Total to Date	Balance
	(a)	(b)	(c)	(b + c) = (d)	(a - d) = (e)
Personnel Costs (Case Manager)	\$ 50,000	\$	\$	\$	\$
Shelter Operations- utilities	\$ 3,000				
TOTAL ESG FUNDS:	\$ 53,000	\$	\$	\$	\$

TOTAL ESG FUNDS:	\$50,000	\$	\$	\$	\$
ESG Match Details:	\$ 50,000				
ESG Match Source Information:					
MA State HCD Grant	\$38,000				
Private funds (donations)	\$15,000				

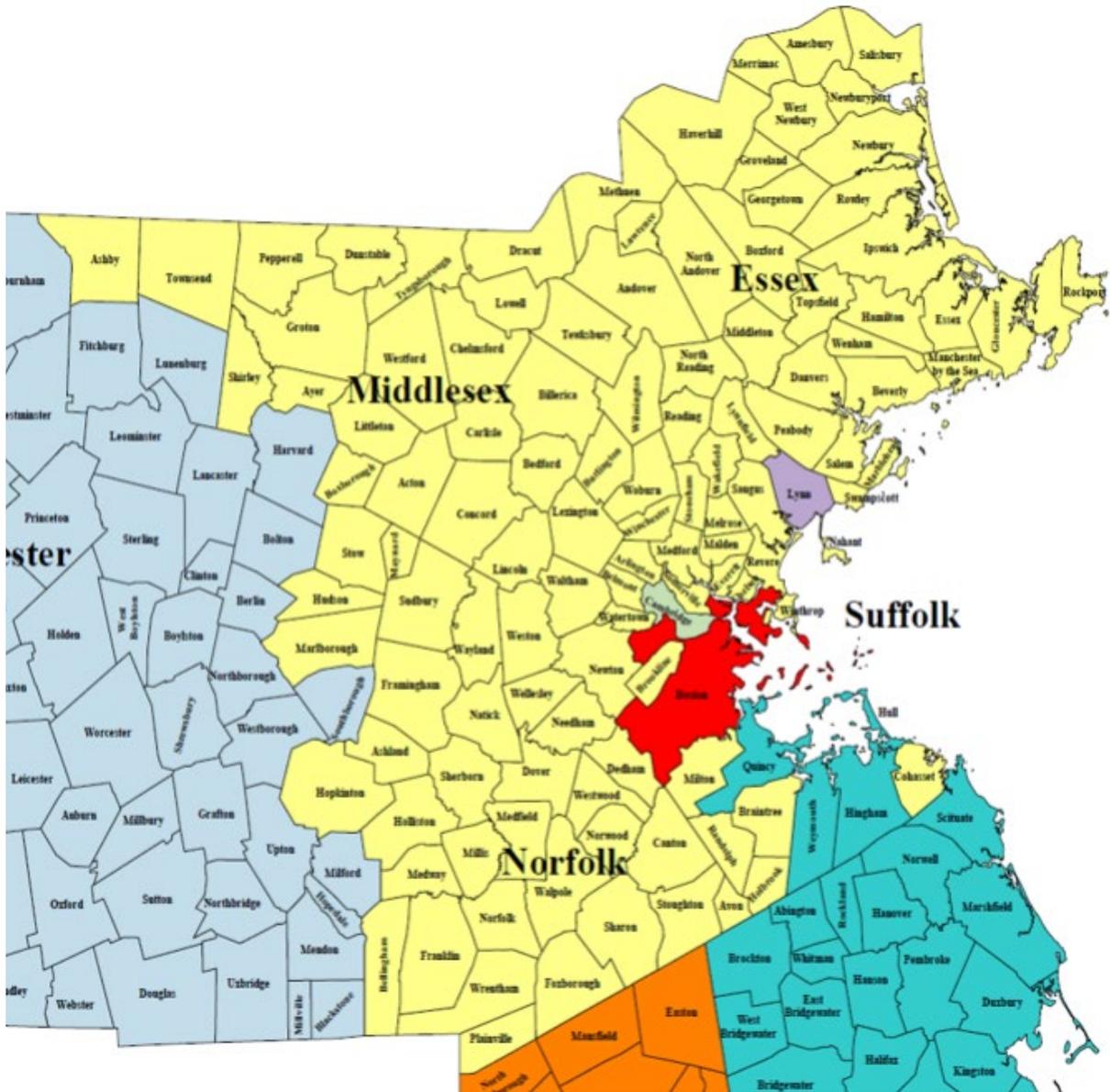
Certified by: _____ Title: _____

****No Request for Reimbursement will be processed without THIS form****

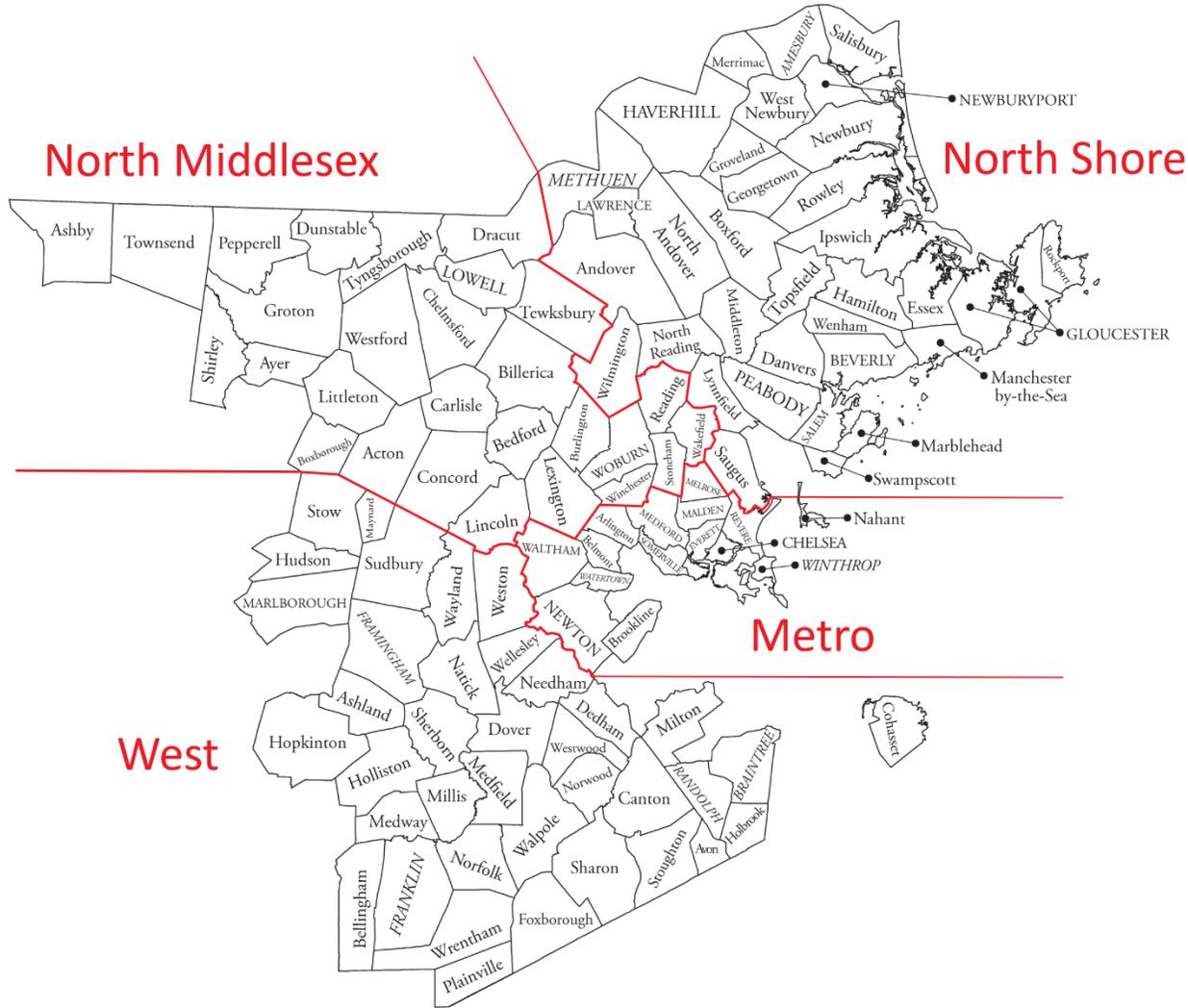
[The document above is a boilerplate example of Appendix B: Budget Cost Control Reporting Statement that would be found in the ESG subrecipient grant agreement]

APPENDIX:

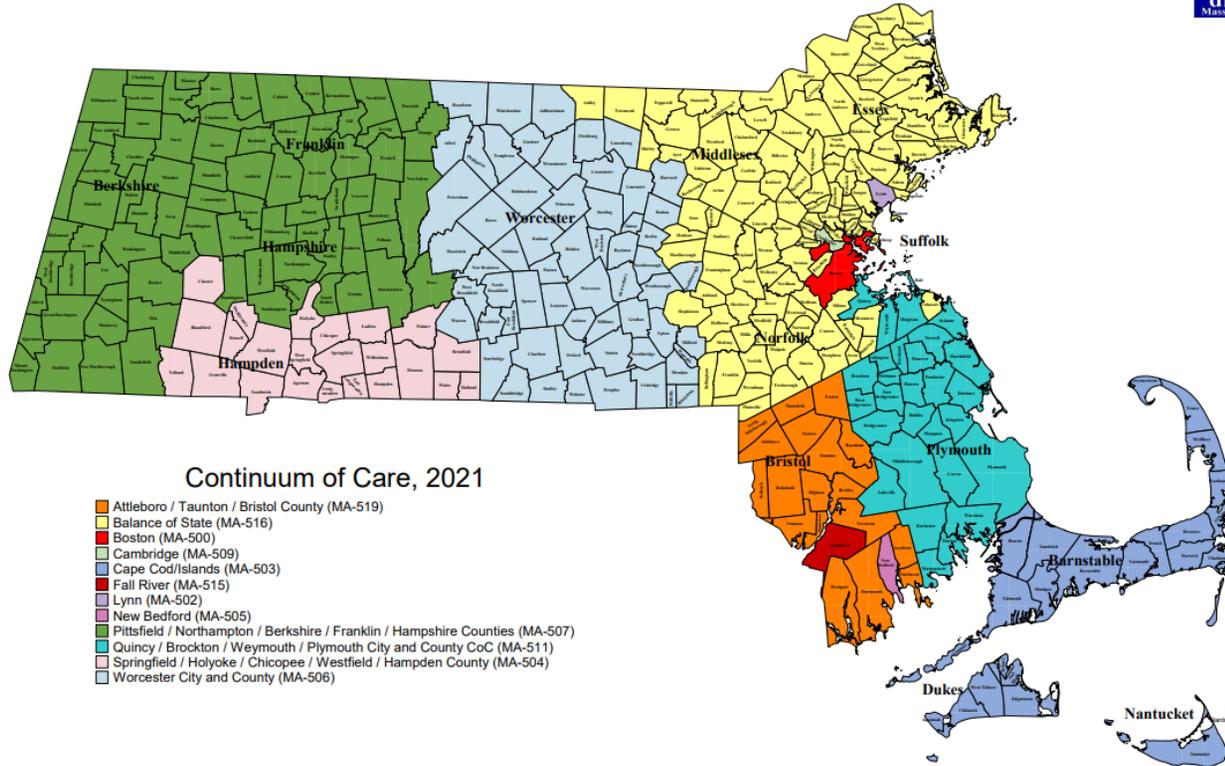
Map 1: Massachusetts Balance of State Continuum of Care area



Map 2. MA BoS CoC Coordinated Entry Region Map:



Map 3: Continuums of Care- State of Massachusetts



Balance of State is the area in yellow

APPENDIX: OTHER FORMS & GUIDANCE

Documentation Requirements for All Clients Receiving ESG Assistance

All clients receiving ESG assistance must have the following documentation included in their case file:

1. Documentation of Homeless or At-risk Homeless Status
2. Documentation of income (when possible, if not- self declaration of income forms will suffice)
3. In the form of case notes, evidence of *at least* an initial consultation with a case manager including a needs assessment and formulation of a long-term plan for housing stability.
4. At Program Entry- HMIS Intake form
5. At Program Exit- HMIS Exit form
6. For clients receiving 3 or months of service: 3 Month Re-certification of Eligibility form

Additional Documentation Requirements by Activity-type

Direct Financial Assistance: All clients provided with ESG assistance in the form of direct financial support (i.e., first last months rent, security deposits, moving costs, rental arrearages, utility arrearages or medium-term rental subsidies) must have the following documentation included in their case file:

1. Lease or Rental Agreement
2. Rent Reasonableness Checklist
3. Housing Habitability Standards Checklist

Housing Relocation and Stabilization Services: All clients receiving Housing Relocation and Stabilization Services (i.e., General Case Management, Housing Search and Placement, Outreach and Engagement) must have case files with detailed case notes indicating the developments and progress made as a result of the ESG-funded services.

***For an extensive list of required documentation, see above Attachment 1. Homeless Definition- Recordkeeping Requirements**

Emergency Solutions Grant Program (ESG)
SELF-DECLARATION OF HOMELESS STATUS

ESG Applicant Name: _____

- Household without dependent children (complete one form for each adult in the household)
 - Household with dependent children (complete one form for household)
- Number of persons in the household: _____

This is to certify that the above named individual or household is currently homeless or at-risk of homelessness, based on the following and other indicated information and the signed declaration by the applicant.

Check only one:

- I [and my children] currently qualify as “homeless” as defined per the HUD definition (Attachment 1).
- I [and my children] currently qualify as “at-risk homeless” as defined per the HUD definition (Attachment 2).

I certify that the information above and any other information I have provided in applying for ESG assistance is true, accurate and complete.

ESG Applicant Signature: _____ Date: _____

ESG Staff Certification

I understand that third-party verification is the preferred method of certifying homelessness or risk for homelessness for an individual who is applying for ESG assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt made for third-party verification:

ESG Staff Signature: _____ Date: _____

Emergency Solutions Grant Program (ESG)

SELF-DECLARATION OF INCOME

ESG Applicant Name: _____

This is to certify the income status for the above named individual. Income includes but is not limited to:

- The full amount of gross income earned before taxes and deductions.
- The net income earned from the operation of a business, i.e., total revenue minus business operating expenses. This also includes any withdrawals of cash from the business or profession for your personal use.
- Monthly interest and dividend income credited to an applicant's bank account and available for use.
- The monthly payment amount received from Social Security, annuities, retirement funds, pensions, disability and other similar types of periodic payments.
- Any monthly payments in lieu of earnings, such as unemployment, disability compensation, SSI, SSDI, and worker's compensation.
- Monthly income from government agencies excluding amounts designated for shelter, and utilities, WIC, food stamps, and childcare.
- Alimony, child support and foster care payments received from organizations or from persons not residing in the dwelling.
- All basic pay, special day and allowances of a member of the Armed Forces excluding special pay for exposure to hostile fire.

When determining the annual income of an individual or family, the provider must use the Part 5 standard for calculating annual income under 24 CFR 5.609 ([eCFR :: 24 CFR 5.609 -- Annual income.](#))

Providers must calculate income using the HUDs income calculator found here:

<https://www.hudexchange.info/incomecalculator/>

Check only one box and complete only that section

I certify, under penalty of perjury, that I currently receive the following income:

Source: _____ Amount: _____ Frequency: _____
Source: _____ Amount: _____ Frequency: _____
Source: _____ Amount: _____ Frequency: _____
ESG Applicant Signature: _____ Date: _____

I certify, under penalty of perjury, that I do not have any income from any source at this time.

ESG Applicant Signature: _____ Date: _____

ESG Staff Verification

I understand that third-party verification is the preferred method of certifying income for ESG assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification.

Documentation of attempt made for third-party verification:

ESG Staff Signature: _____ Date: _____

City of Lowell, Department of Planning and Development
Emergency Solutions Grant Program Declaration of Income Form

Emergency Solutions Grant Program (ESG) 3-MONTH RE-CERTIFICATION OF ELIGIBILITY

ESG Client Name: _____

Today's Date: _____

How many total months of service has the client received to date? _____

(Note: count all ESG service types- including all forms for financial assistance and case management)

HOUSEHOLD INFORMATION

Has any of the client's contact information changed in the past three months? Yes No (If yes, please provide updated information below)

CURRENT STREET ADDRESS: _____ APT. #: _____

CITY: _____ STATE: _____ ZIP CODE: _____

PHONE: _____ EMAIL: _____

Has the Client's household composition changed since program entry? Yes No (If yes, please provide updated information below)

TOTAL # OF PEOPLE IN THE HOUSEHOLD: _____

OF ADULTS IN THE HOUSEHOLD: _____

OF CHILDREN UNDER THE AGE OF 18 CURRENTLY RESIDING IN THE HOUSEHOLD: _____

HOMELESSNESS STATUS INFORMATION

Have there been any changes to the client's homelessness status in the past three months? Yes No (If yes, please complete a new & updated *ESG Self Declaration of Homeless Status Form* and attach to this form.)

INCOME INFORMATION

Have there been any changes to the client's income in the past three months? Yes No (If yes, please complete a new & updated *ESG Income Declaration Form* and attach to this form.)

OTHER CHANGES TO CLIENT STATUS THAT RELATE TO ESG ELIGIBILITY

Please use the space below to discuss any additional changes to the client's status that have occurred over the past three months as it relates to eligibility for ESG services:

ESG STAFF VERIFICATION

I understand that third-party verification is the preferred method of certifying eligibility for ESG assistance. I understand self declaration is only permitted when I have attempted to but cannot obtain third party verification. To the best of my knowledge, all of the above information is true.

ESG Staff Signature: _____

Date: _____

City of Lowell, Department of Planning and Development
Emergency Solutions Grant Program
3-Month Re-certification of Eligibility Form

APPENDIX: CARES ACT

ADJUSTMENTS TO ESG WRITTEN STANDARDS FOR CORONAVIRUS EMERGENCY SOLUTIONS GRANTS (ESG-CV)

President Trump signed the CARES Act (“the Act”) on March 27, 2020, to help the nation respond to the coronavirus (COVID-19) outbreak. The CARES Act made available an additional \$4 billion in ESGCV- funds to supplement the Fiscal Year (FY) 2020 ESG-CV funding provided under the Further Consolidated Appropriations Act, 2020 (Public Law 116-94). Of this amount, the Department immediately allocated \$1 billion for ESG-CV- grants based on the FY 2020 ESG-CV formula. The funds may be used to cover or reimburse allowable costs incurred by the City and Sub-recipients before the award of funding (including prior to the signing of the CARES Act) to prevent, prepare for, and respond to COVID-19.

The City of Lowell was award approximately \$3.2 million in ESG-CV funds and will administer ESG-CV programs to prevent, prepare for, and respond to the coronavirus pandemic 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 of COVID-19. While still providing support for emergency shelters and services to the homeless, the new ESG-CV grant focuses on preventing initial and recurrent homelessness, shortening the duration of homelessness, assisting in the transition from homelessness to independent living, and providing outreach, needs assessment and other services for the homeless.

The purpose of this addendum is to provide guidance for the ESG-CV grant on additional requirements, waivers, and eligible activities, and in conjunction with the City’s ESG Written Standards, each grant application, grant agreement, budget and/or all relevant federal and state statutes and regulations will apply to the ESG-CV programs.

The ESG-CV grant is authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371–11378) as amended by the Act. The program authorizes the Department of Housing and Urban Development (HUD) to make grants to States, units of general-purpose local government, and territories for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid re-housing assistance. (24 CFR 576.1)

Specific waivers and alternate requirements for the ESG-CV grant includes:

- The funds are not subject to the spending cap on emergency shelter and outreach under 24 CFR 576.100(b)(1);
- Up to 10 percent of funds may be used for administrative costs, compared to 7.5 percent as provided by 24 CFR 576.108(a);
- The funds are exempt from the ESG-CV match requirements, including 24 CFR 576.201;
- The funds may be used to provide homelessness prevention assistance (as authorized under 24 CFR 576.103 or subsequent HUD notices) to any individual or family who does not have income higher than HUD’s Very Low-Income Limit for the area (50% Average Medium Income) and meets the criteria in paragraphs (1)(ii) and (1)(iii) of the “at risk of homelessness” definition in 24 CFR 576.3;
- Sub-recipients may deviate from applicable procurement standards when using these funds to procure goods and services to prevent, prepare for, and respond to coronavirus, notwithstanding 24 CFR 576.407(f) and 2 CFR 200.317-200.326;

- While it is encouraged to offer treatment and supportive services when necessary to assist vulnerable homeless 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 these funds are used, notwithstanding 24 CFR 576.401(e).

In addition, the Act authorizes the Secretary to grant waivers of and specify alternative requirements for statutes and regulations the Secretary administers in connection with the use of ESG-CV funds (except for requirements related to fair housing, nondiscrimination, labor standards, and the environment). These waivers and alternative requirements can be issued when necessary to expedite and facilitate the use of funds to prevent, prepare for, and respond to coronavirus. In accordance with 24 CFR 5.110, HUD made a determination of good cause and subject to statutory limitations, waive regulatory provisions. Additional regulatory waiver authority is provided in 24 CFR 91.600. These regulatory provisions provide HUD the authority to make waiver determinations for the ESG-CV Program and consolidated planning requirements for all CPD formula programs.

A memorandum by John Gibbs, CPD Assistant Secretary, provided additional flexibility to communities to prevent the spread of COVID-19 and better assist individuals and families, including those experiencing homelessness, infected with COVID-19 or economically impacted by the virus. The waivers associated with the ESG-CV HMIS, Homelessness Prevention and Rapid Re-housing programs to prevent the spread of COVID-19 are described under each ESG-CV component section below. Waiver dates are subject to extension based on memoranda from HUD. Provisions that are not specifically waived remain in full effect.

EMERGENCY SHELTERS

ESG-CV funds may be used for costs of providing Essential Services to homeless families and individuals in emergency shelters, renovating buildings to be used as emergency shelter for homeless families and individuals, and operating emergency shelters.

Expanded Definition of ESG-CV- Eligible Shelter Funds

The purpose of ESG-CV funds is to prevent, prepare for, and respond to COVID-19 in order to prevent and mitigate the spread of COVID-19 among people experiencing homelessness and the staff that provide services to these individuals. This requires that existing shelters implement public health protocols such as enforcing social distancing, establishing an isolation space (especially for residents suspected of having COVID-19, those with confirmed cases, and high-risk residents such as elderly people and people with pre-existing health conditions), using personal protective equipment (PPE), and cleaning/disinfecting shared and living spaces. In many communities where existing shelter is not available or where current shelters are not able to implement these safety protocols, additional space may need to be identified to allow people to have shelter while staying as healthy as possible. This may be space within an existing shelter (e.g., an office not being used) that could be temporarily converted into a quarantine space for someone who has tested positive or is awaiting test results, or it could be an entirely separate building. Eligible shelter spaces may include public spaces, pop up or modular structures in compliance with [U.S. Department of Housing and Urban Development \(HUD\) guidance](#).

Coordinate with public health partners to establish COVID-19-specific procedures where appropriate.

If shelters utilize symptom screening as a part of intake procedures, it must be reviewed and approved by the City's Department of Public Health or the Healthcare for the Homeless partner.

Shelters funded by ESG-CV must establish referral pathways to isolation and quarantine if a client is in need of such

services.

Shelters funded through ESG-CV will maintain social distancing requirements established in partnership with the state's department of public health.

Admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding the length of stay, if any, and safeguards to meet the safety and shelter needs of special populations (e.g., victims of domestic violence, sexual assault, and stalking) and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.

Shelters funded by ESG-CV may not turn away eligible program participants and must establish referral pathways to other shelters or housing if the shelter is at maximum capacity. Shelters must establish referral pathways to isolation and quarantine if a client is in need of such services.

Someone who is present at an ESG-funded shelter with respiratory symptoms (e.g., cough) should not be turned away solely because of their health symptoms.

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

Any ESG-funded shelter that is considering closing or not accepting new residents must immediately notify the public health authority, and emergency management officials.

STREET OUTREACH

Standards for targeting and providing essential services related to street outreach.

HUD has approved the following as eligible costs under street outreach:

- Engagement: Hand sanitizer, soap, tissue packets, masks, disposable gloves, other PPE.
- Case Management: Coordinating medical care.
- Transportation: Train or bus tokens, taxi or rideshare for program participants' travel to and from medical care.
- Expanded Staffing: Hiring additional staff to support infectious disease preparedness, providing hazard pay to staff with direct participant contact.

ESG-CV funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of this section, the term "unsheltered homeless people" means individuals and families who qualify as homeless under 24 CFR 576.2 (1)(i).

HOMELESS PREVENTION AND RAPID REHOUSING (RRH)

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 576.2. 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 the “homeless” definition at 24 CFR 576.2 and have an annual income below 50 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 24 CFR 576.105, the short-term and medium-term rental assistance requirements in 24 CFR 576.106, and the written standards and procedures established under 24 CFR 576.400.

Assessing, prioritizing, and reassessing individuals’ and families’ needs for essential services related to emergency shelter.

Under this state of emergency, HUD supports communities considering other prioritization elements as necessary to prevent the spread of COVID-19 among those who are homeless or at risk of homelessness and to respond to those already impacted by the pandemic.

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 RRH assistance.

Local jurisdictions may prioritize the use of ESG-CV funds for proven strategies, especially Rapid

Rehousing for those experiencing homelessness. Note: people cannot be denied RRH because of “zero income.”

Targeted Prevention: Based on race equity analysis, the jurisdiction will target prevention services to three marginalized areas of town (identify three areas). These three areas of town serve disproportionately large communities of Black, Indigenous, and people of color who experience homelessness. They have been historically underserved and had poor access to permanent housing solutions offered by the homeless response system.

Coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing (RRH) assistance providers; other homeless assistance providers; and mainstream service and housing providers (see §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).

The City and its Department of Public Health will notify citizens where to get testing for people experiencing homelessness at various locations. ESG-CV funded shelters and outreach programs should encourage (but may not require) people experiencing homelessness to get tested if they are experiencing COVID-19 symptoms.

Shelters in the jurisdiction are encouraged to use funds provided through ESG-CV to purchase technology to access telehealth services provided through Healthcare for the Homeless.

Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or Rapid Rehousing (RRH) assistance. Under the Coronavirus Aid, Relief, and Economic Security (CARES) Act ESG-CV funding, there will be no rental payment requirement for households receiving financial assistance. Projects funded are expected to serve people with zero income.

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. The CARES Act provides that ESG-CV funds

may be used to mitigate the economic impact of COVID19. Programs are encouraged to consider the maximum number of rental assistance months be extended/adjusted to address unemployment, loss of income, or benefits due to COVID-19.

RRH Sub-recipients must use a progressive engagement model; this practice supports using the least intensive intervention to help resolve homelessness for the individual or family. Providers are to add more assistance only as necessary if the less intensive intervention is unsuccessful. RRH households receiving rental assistance subsidies must contribute a minimum of 30 percent of their monthly adjusted income toward their monthly rent. This tenant rent contribution may be adjusted at any time based on changes to household income. There is no minimum rent requirement and tenant rent contribution may be zero for households with no income.

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 RRH assistance that each program participant may receive (such as the maximum amount of assistance, maximum number of months the program participant may receive assistance, or the maximum number of times the program participant may receive assistance).

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 576.2. 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 the 'homeless' definition at 24 CFR 576.2 and have an annual income below 50 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 24 CFR 576.105, the short- and medium- term rental assistance requirements in 24 CFR 576.106, and the written standards and procedures established under 24 CFR 576.400.

Landlord Incentives: 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 equal to 2 months of rent.
- Security deposits equal to up to three months of rent, or the state statute.
- 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.

ESG CV REPORTING REQUIREMENTS

HUD requires each recipient of ESG-CV funding to submit reports quarterly through the Sage HMIS Reporting Repository. Reports will be due 30 calendar days after the quarter ends. The reporting schedule and due dates are as follows:

ESG-CV Report Submissions
Start to September 30, 2020

Due Date
October 30, 2020

October 1, 2020 to December 31, 2020	January 30, 2021
January 1, 2021 to March 31, 2021	April 30, 2021
April 1, 2021 to June 30, 2021	July 30, 2021
July 1, 2021 to September 30, 2021	October 30, 2021
October 1, 2021 to December 31, 2021	January 30, 2022
January 1, 2022 to March 31, 2022	April 30, 2022
April 1, 2022 to June 30, 2022	July 30, 2022
July 1, 2022 to September 30, 2022	October 30, 2022

Additional submissions as needed until the grant is closed out.

ESG-CV Waivers

Waiver No.10 of Memorandum dated 4/1/2020 – HMIS Lead Activities:

Requirement: ESG-CV funds may be used to pay the costs of managing and operating the HMIS, provided that the ESG-CV recipient is the HMIS Lead. Citation: 24 CFR 576.107(a)(2)

Explanation: To enable ESG-CV-funded projects to participate in HMIS as required by section 416(f) of the McKinney-Vento Homeless Assistance Act, 24 CFR 576.107(a)(2) authorizes the use of ESG-CV funds for managing and operating the HMIS (e.g., hosting and maintaining HMIS software or data, upgrading, customizing, and enhancing the HMIS), only where the ESG-CV recipient is the HMIS Lead.

Justification: Waiving the rule as specified below would allow more recipients to use ESG-CV funding to upgrade or enhance the HMIS as needed to incorporate ESG-CV program data related to COVID-19.

Applicability: The condition that the recipient must be the HMIS Lead to pay costs under 24 CFR 576.102(a)(2) is waived to the extent necessary to allow any recipient to use ESG-CV funds to pay costs of upgrading or enhancing its local HMIS to incorporate data on ESG-CV Program participants and ESG-CV activities related to COVID-19. This waiver is in effect for 6-months beginning on the date of this memorandum.

Waiver No.11 of Memorandum dated 4/1/2020 - Re-evaluations for Homelessness Prevention Assistance:

Requirement: Homelessness prevention assistance is subject to re-evaluation of each program participant’s eligibility need for assistance not less than once every 3 months.

Citation: 24 CFR 576.401(b) Explanation: The ESG-CV regulations at 24 CFR 576.401(b) requires recipients or Sub-recipients providing homelessness prevention assistance to re-evaluate the program participant’s eligibility, and the types and amounts of assistance the program participant needs not less than once every 3 months.

Justification: Waiving re-evaluation requirement for homelessness prevention assistance as specified below is necessary to help program participants remain stable in housing during the economic uncertainty caused by COVID-19.

Applicability: The required frequency of re-evaluations for homelessness prevention assistance under section 576.401(b) is waived for up to 2-years beginning on the date of this memorandum, so long as the recipient or Sub-recipient conducts the required re-evaluations not less than once every 6 months.

Waiver No.12 of Memorandum dated 4/1/2020 - Housing Stability Case Management:

Requirement: Program participants receiving homelessness prevention or rapid re-housing assistance must meet with a case manager not less than once per month, unless certain statutory prohibitions apply. Citation: 24 CFR 576.401(e)

Explanation: Under 24 CFR 576.401(e), the recipients or Sub-recipients must require program participants to meet with a case manager not less than once per month to assist them in ensuring long-term housing stability, unless the Violence Against Women Act of 1994 or Family Violence Prevention and Services Act prohibits the recipient or Sub-recipient from making its shelter or housing conditional on the participant's acceptance of services.

Justification: Recipients are reporting limited staff capacity as staff members are home for a variety of reasons related to COVID-19 (e.g., quarantining, children home from school, working elsewhere in the community to manage the COVID-19 response). In addition, not all program participants have capacity to meet via phone or internet. Waiving the monthly case management requirement as specified below will allow recipients to provide case management on an as needed basis and reduce the possible spread and harm of COVID-19.

Applicability: This waiver is in effect for three months beginning on March 31, 2020.

Waiver No.13 of Memorandum dated 4/1/2020 - Restriction of Rental Assistance to Units with Rent at or Below Fair Market Rent (FMR)

Requirement: Restriction of rental assistance to units with rent at or below FMR. Citation: 24 CFR 576.106(d)(1)

Explanation: Under 24 CFR 576.106(d)(1), rental assistance cannot be provided unless the total rent is equal to or less than the FMR established by HUD, as provided under 24 CFR Part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507.

Justification: Quickly moving people into permanent housing is especially critical in preventing the spread of COVID-19. Waiving the limit on rental assistance to rents that are equal to or less than the FMR, established by HUD, will assist recipients and Sub-recipients in more quickly locating additional units to house individuals and families experiencing homelessness.

Applicability: The FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit during the 6-month period beginning April 1, 2020. The ESG-CV recipient or Sub-recipient must still ensure that the units in which ESG-CV assistance is provided to these individuals and families meet the rent reasonableness standard.

Waiver No. 11 of Memorandum dated 9/30/2020 – Homeless Definition-Temporary Stays in Institutions of 90 Days or Less.

Requirement: The definition of homeless in 24 CFR 576.2 includes under paragraph (l)(iii) an individual who is exiting an institution where he or she resided for 90 days or less and has resided in an emergency shelter or place not meant for human habitation immediately before entering that institution, which is an interpretation of §103(a)(4) of the McKinney-Vento Act which includes an individual who resided in a shelter or place not meant for human habitation and who is exiting an institution where he or she temporarily resided (emphasis added).

Citation: 24 CFR 576.2, definition of "homeless," (1)(iii)

Explanation: 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 are considered homeless per 24 CFR 576.2, definition of "homeless." Justification: Recipients are reporting that program participants are residing in institutions for longer periods of time as a result of COVID-19 (e.g., longer time in jail due to a postponed court dates due to court closings or courts operating at reduced capacity and longer hospital stays when infected with COVID-19). Allowing someone who was residing in an emergency shelter or place not meant for human habitation prior to entering the institution to maintain their homeless status while residing in an institution for longer than 90 days is necessary to prevent the spread of COVID-19 by expanding housing options for people who were experiencing homelessness and institutionalized for longer than traditionally required due to COVID-19. This waiver is in effect for 6-months beginning on the date of this memorandum.

As an entitlement community, the City of Lowell receives allocations of Community Development Block Grant (CDBG) funds, a program authorized under Title I of the Housing and Community Development Act of 1974, as amended. CDBG funds promote viable urban communities through a variety of activities including decent housing, public services, public facility updates, and economic opportunities. These activities must primarily serve low- and moderate-income persons, households, or areas. The city administers its CDBG funds on behalf of the US Department of Housing and Urban Development (HUD). The rules and regulations of the CDBG program can be found at Title 24 in the Code of Federal Regulations (CFR) in Part 570.

The City of Lowell Also receives Emergency Solutions Grant (ESG) funds. ESG is a formula grant program. Eligible recipients generally consist of metropolitan cities, urban counties, territories, and states, as defined in 24 CFR 576.2. The [Homeless Emergency Assistance and Rapid Transition to Housing Act of 2009 \(HEARTH Act\)](#) amended the McKinney-Vento Homeless Assistance Act, revising the Emergency Shelter Grants Program in significant ways and renaming it the Emergency Solutions Grants (ESG) program. The ESG Interim Rule took effect on January 4, 2012. The change in the program's name, from Emergency Shelter Grants to Emergency Solutions Grants, reflects the change in the program's focus from addressing the needs of homeless people in emergency or transitional shelters to assisting people to quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness.

On March 27, 2020, the Coronavirus Aid, Relief, and Economic Security Act (CARES Act) was signed into Public Law 116-136, which provides additional Community Development Block Grant (CDBG-CV) and Emergency Solutions Grant (ESG-CV) funding to prepare, prevent, and respond to coronavirus. As of October 14, 2020, there have been three rounds of either CDBG-CV or ESG-CV funds announced by HUD.

On April 2, 2020, HUD announced the availability of \$1,305,645 in CDBG-CV (1) and \$632,876 in ESG-CV (1) funds allocated to the City of Lowell.

On June 9, 2020 HUD allocated an additional \$2,610,376 in ESG-CV (2) funds. Then, on September 11, 2020 an additional allocation of \$1,251,394 in CDBG-CV (3).

Due to the Coronavirus, effective March 16, 2020 the City Manager declared all city offices closed to the public. Employees were encouraged to not hold or attend any in person meetings. All meetings should and would be held virtual for the time being. Due to the coronavirus epidemic, and for the safety of all involved, the City of Lowell has decided to implement the use of the MEGA Waiver, brought about by the CARES Act. One of the ways the City of Lowell will utilize this waiver, is to not use the 30 day public comment period, as required by HUD, with the recommendations of the funds to be awarded. The city will use a 5-day public comment period posted on the city's website at lowellma.gov.

All public hearings will also be held virtual throughout this pandemic via zoom. Postings with the zoom meeting information will also be posted to the city's website.

Any sub-recipient or interested party may contact the Assistant City manager/Deputy Director of Department of Planning and Development at Ybeaz@lowellma.gov

ESG-CV

These special ESC-CV Supplemental 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.

ESG-CV is designed to broaden existing emergency shelter and homelessness prevention activities, emphasize rapid re-housing and help people quickly regain stability in permanent housing after experiencing a housing crisis and/or homelessness. ESG-CV funds may be used for street outreach, emergency shelter services, homelessness prevention, rapid re-housing assistance, and the Homeless Management Information System (HMIS).

The stated objectives of the Emergency Solutions Grants Program are to “increase the number and quality of emergency shelters and transitional housing facilities for homeless individuals and families to operate these facilities and provide essential social services, and to help prevent homelessness.

1. Street Outreach & Emergency Shelter-

Eligible activities for street outreach include engagement, case management, eligible health and mental health services, transportation and services for special populations. Eligible activities for emergency shelter includes the same essential services as street outreach and also include shelter activities such as renovations and operations of facilities. Combined street outreach and emergency shelter expenditures cannot exceed 60% of the fiscal years' total ESG-CV grant award.

2. Homeless Prevention

Funds can be used to prevent an individual or family from becoming homeless or to help an individual or family regain stability in current housing or other permanent housing. Eligible activities include housing relocation and stabilization services and short and medium term rental assistance for those who are at risk of becoming homeless.

3. Rapid Re-Housing

Eligible activities include housing relocation and stabilization services and short or medium term rental assistance for those who are literally homeless or currently living in an emergency shelter or place not meant for human habitation.

4. Homeless Management Information System (HMIS)

All subrecipients are required to participate in the Homeless Management Information System (HMIS) per the ESG Interim Rule (24 CFR 576 and 5780). HMIS provides an opportunity to document homelessness and helps to ensure coordination between service providers while avoiding duplication of services and client data.

Recipients must expend all amounts awarded through the first and second allocations of ESG-CV funds by September 30, 2023, except for administration and HMIS funds necessary for ESG-CV closeout, which must be expended by December 31, 2023. The new expenditure deadline of September 30, 2023 is necessary because the pandemic has lasted much longer than initially anticipated and “continues to cause significant risk to the public health and safety of the Nation.” HUD has determined ESG-CV activities will still be needed to prevent, prepare for, and respond to coronavirus (as defined in Notice CPD-21-08) after the original grant end date of September 30, 2022. Many communities will need to make long term changes to their shelter programs to enable them to provide quarantine and isolation spaces when future coronavirus variants arise. Recent dramatic increases in rental housing costs will require additional rapid rehousing, and although rapid rehousing assistance is designed to be flexible and provided only as long as needed, HUD recognizes the difficulties in finding landlords willing to accept families whose assistance is set to expire before the end of the initial lease term. The additional three months for expending administration and HMIS funding (i.e., from September 30, 2023 to December 31, 2023) is necessary to give recipients sufficient time to accurately draw down and report on expenditures completed by September 30, 2023 after fully completing ESGCV funded activities to prevent, prepare for, and respond to coronavirus.

The Administrative costs cap for ESG-CV funds only is 10% of the total award.

There is no Match requirements for ESG-CV funds.

USEFUL LINKS

ESG PROGRAM AMENDMENT

[eCFR :: 24 CFR Part 576 -- Emergency Solutions Grants Program](#)

Homeless Definition Final Rule

[eCFR :: 24 CFR 91.5 -- Definitions.](#)

[Homeless Emergency Assistance and Rapid Transition to Housing \(HEARTH\): Defining Chronically Homeless Final Rule - HUD Exchange](#)

HUD Fair Market Rents

[Fair Market Rents \(40th PERCENTILE RENTS\) | HUD USER](#)

ESG Rent Reasonableness and Fair Market Rent Guidance

[ESG Rent Reasonableness and Fair Market Rent - HUD Exchange](#)

ESG Program Components Quick Reference

[Microsoft Word - ESG Program Components Quick Reference 8-29-13 \(hudexchange.info\)](#)