



POLICY MANUAL
EMERGENCY SOLUTIONS GRANTS (ESG) PROGRAM

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I. INTRODUCTION

BACKGROUND AND PROGRAM DESCRIPTION

A. Description of Emergency Solutions Grants (ESG) Program

On May 20, 2009, President Obama signed the Homeless Emergency Assistance and Rapid Transition to Housing (HEARTH) Act of 2009. Beginning FY 2011 the U.S. Government has allocated \$250 million in funds to eligible recipients 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 and individuals from becoming homeless. Pima County and the City of Tucson may provide ESG funds to projects operated by units of general purpose local government or private nonprofit organizations. The Continuum of Care within these jurisdictions must be consulted when determining how to allocate the ESG funds.

All funded agencies are required to follow federal guidelines in the implementation of ESG funding. The City of Tucson and Pima County have written the following policies and procedures to facilitate the agencies in implementing the ESG guidelines as set by the U.S. Department of Housing and Urban Development. Agencies will provide assistance related to housing of persons at risk of becoming homeless and housing persons that are currently homeless, as well as provide housing relocation and stabilization services.

B. ESG Program Awards to City of Tucson and Pima County

The City of Tucson's Department of Housing and Community Development and Pima County's Department of Community Development and Neighborhood Conservation have both received an ESG formula grant. The City of Tucson and Pima County have decided to collaborate in the development of the policies and procedures regarding the disbursement of funds and data collection to promote consistent standards and avoid duplicate and unnecessary assistance. There are differences between the jurisdictional requirements and procedures due to jurisdictional target area differences. Pima County is focused on unincorporated areas whereas the City of Tucson is focused on the population within city limits.

C. Community Input for Program Development

The participation of homeless or formerly homeless individuals will assist in the allocation process and provide input to the evaluation of performance measures where at all possible.

D. Process for Sub-Awards

Funds will be awarded by the ESG Grantees on a competitive basis. The Request for Proposal Notice is released through the Continuum of Care as well as through the City Participation Process. The City of Tucson and Pima County jointly make the funding allocations. Members of the allocation committee are selected for their knowledge of services and participation in the Continuum. Every effort is made to involve a homeless or formerly homeless person in the process. The committee ranks the proposals individually and then reviews them as a committee and makes the final funding recommendations.

A HUD Technical Assistance provider is assisting the Continuum to determine a process where performance standards will be set, as well as a process to evaluate outcomes.

E. Location of Policy Manual

The Policy Manual will be available as electronic documents located on both the Pima County and the City of Tucson website. A hard copy will also be available for review at the City of Tucson's Department of Housing and Community Development and Pima County's Department of Community Development and Neighborhood Conservation.

F. Revisions and Updates

The Policy Manual is a living document. As policies or procedures are modified, these revisions will be updated in the Policy Manual. The most recent version of Policy Manual will be posted online and able for viewing at the respective locations mentioned above.

II. ESG Program General Overview

The ESG program funds are intended to target two populations of persons facing housing instability: (1) individuals and families who are experiencing homelessness (residing in emergency or transitional shelters or on the street) and need temporary assistance in order to obtain housing and retain it, and (2) individuals and families who are currently in housing but are at risk of becoming homeless and need temporary rent and utility assistance to prevent them from becoming homeless or assistance to move to another unit.

A. ELIGIBLE PROGRAM COMPONENTS

- a. Street outreach: Essential services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, and transportation. Street outreach includes services that are unable to be provided to individuals or families due to their unwillingness to come to a shelter.
- b. Emergency Shelter: Essential services such as 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, transportation, and services for special populations.

Shelter operations include maintenance, rent, repair, security, fuel, equipment, insurance, utilities, relocation, and furnishings. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

- c. Homelessness Prevention: Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from becoming homeless if:

- i. Annual income of the individual or family is below 30 percent of median family income
- ii. Assistance is necessary to help program participants regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.

Eligible costs include utilities, rental application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.

- d. **Rapid Re-Housing:** Housing relocation and stabilization services and short and/ or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing. Eligible costs also include utilities, rent application fees, security deposits, last month's rent, utility deposits and payments, moving costs, housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, and credit repair.
- e. **Data Collection (HMIS):** Grant funds may be used for the costs of participating in an existing HMIS of the Continuum of Care where the project is located. Eligible costs include computer hardware, software, and software licenses. Also, office space, utilities, equipment and obtaining technical support may be paid for. Salaries for operation of HMIS may also be paid.
- f. **Emergency Solutions Grant Administration:** Up to 7.5 percent of a recipient's allocation can be used for general management, oversight, coordination, and reporting on the program.

B. HOMELESS DEFINITION

- a. **Category 1: Literally Homeless**
 - i. Individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - 1. Has a primary nighttime residence that is a public or private place not meant for human habitation;
 - 2. Is living in a publicly or privately operated shelter designed 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); or
 - 3. Is exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.
- b. **Category 2: Imminent Risk of Homelessness**
 - i. Individual or family who will imminently lose their primary nighttime residence, provided that:

1. Residence will be lost within 14 days of the date of application for homeless assistance
 2. No subsequent residence has been identified; and
 3. the individual or family lacks the resources or support networks needed to obtain other permanent housing
- c. Category 3: Homeless under other Federal Statutes
- i. Unaccompanied youth under 25 years of age, or families with children or youth, who do not otherwise qualify as homeless under this definition, but who:
 1. Are defined as homeless under the other listed federal statutes;
 2. Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application
 3. Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and
 4. Can be expected to continue in such status for an extended period of time due to special needs or barriers
- d. Category 4: Fleeing/ Attempting to Flee DV
- i. Any individual or family who:
 1. Is fleeing, or is attempting to flee, domestic violence;
 2. Has no other residence; and
 3. Lacks the resources or support networks to obtain other permanent housing.

C. ELIGIBILITY BY COMPONENT: HOMELESS

- a. Street Outreach: Individuals defined as homeless under the following categories are eligible for assistance in Street Outreach:
 - i. Category 1 = Literally Homeless
 - ii. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
 1. Additional limitation on eligibility: 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.
- b. Emergency Shelter: Individuals and families defined as Homeless under the following categories are eligible for assistance in Emergency Shelter projects:
 - i. Category 1 = Literally Homeless
 - ii. Category 2 = Imminent Risk of Homeless
 - iii. Category 3 = Homeless Under Other Federal Statutes
 - iv. Category 4 = Fleeing/ Attempting to Flee DV
- c. Rapid Re-housing: Individuals defined as Homeless under the following categories are eligible for assistance in Rapid Re-Housing projects:
 - i. Category 1 = Literally Homeless
 - ii. Category 4 = Fleeing/ Attempting to Flee DV (where the individual or family also meets the criteria for Category 1)
- d. Homelessness Prevention: Individuals and Families defined as Homeless under the following categories are eligible for assistance in Homeless Prevention projects:
 - i. Category 2 = Imminent risk of Homeless

- ii. Category 3 = Homeless Under Other Federal Statutes
- iii. Category 4 = Fleeing/ Attempting to Flee DV
 - 1. Individuals and Families who are defined as Homeless under the following categories are eligible for assistance in Homelessness Prevention projects
 - 2. Homelessness Prevention projects have the following additional limitations on eligibility with homeless and at risk of homeless:
 - a. Must only serve individuals and families that have an annual income below 30% of AMI.

D. CATEGORIES OF AT RISK OF HOMELESSNESS

- a. Category 1: Individuals and Families
 - i. Has an annual income below 30% of median family income for the area; AND
 - 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; AND
 - iii. Meets one of the following conditions:
 - 1. Has moved because of economic reasons 2 or more times during the 60 days immediately preceding the application for assistance; OR
 - 2. Is living in the home of another because of economic hardship; OR
 - 3. 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; OR
 - 4. 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; OR
 - 5. 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 person per room; OR
 - 6. Is exiting a publicly funded institution or system of care; OR
 - 7. 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
- b. Category 2: Unaccompanied Children and Youth
 - i. A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute.
- c. Category 3: Families with Children and Youth
 - i. 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.

E. PROGRAM GOVERNANCE

City of Tucson and Pima County work with the HUD Regional Office and the Continuum of Care- represented by the Tucson Pima Collaboration to End Homelessness (TPCH), to ensure successful implementation and performance. The TPCH Emergency Solutions committee will review policies, procedures and performance measures.

F. FUNDS REALLOCATION AND RECAPTURE

Quarterly, the City and County ESG Program Coordinators will:

- Review financial reports and budget allocations for the eligible program components, and will re-allocate resources if necessary;
- Review service data on subpopulations to ensure that the program is serving groups such as military veterans or people with disabilities which is part of the Consolidated Annual Performance Evaluation Report (CAPER). Annually, this information will be provided to the Emergency Solutions committee.

G PROGRAM POSITION DESCRIPTIONS

The following is a summary of each Emergency Solutions Grant Program position related to grant administration and program delivery. Further details about specific program procedures are found in Part III.

1. City of Tucson Project Coordinator

This position is responsible for administering the ESG grant that was awarded to the City of Tucson. In collaboration with the Pima County Project Coordinator, guides the program by acting as liaison with the Continuum of Care and other contractors, and also monitors agency subcontracts, ensures coordination with other mainstream services and prepares quarterly and annual performance reports to HUD.

2. Pima County Program Coordinator

This position is responsible for administering the ESG grant that was awarded to Pima County. In collaboration with the City of Tucson Project Coordinator, guides the program by meeting regularly with the Emergency Solutions committee and other contractors, and also monitors agency subcontracts, ensures coordination with other mainstream services and prepares quarterly and annual performance reports to HUD.

H. MARKETING, OUTREACH, AND CLIENT ACCESS

1. Outreach Activities

The ESG Program staff will conduct informational presentations about the ESG Program, and will provide regular reports to Tucson Pima Collaboration to end Homelessness (TPCH), which

is the local HUD Continuum of Care. Sub-recipients conduct outreach to support ESG component goals and activities to persons who are homeless or near homeless so that they are aware of the program and its services.

I. COORDINATION AMONG PROVIDERS

Assistance is targeted to housing stabilization, linking program participants to mainstream resources and assisting them to develop a plan to increase future housing stability.

Sub-recipients provide eligible services and activities which may include: case management, counseling, developing, securing and coordinating services, linkage with mainstream resources, monitoring and evaluation of program participant progress. Sub-recipients also assure that program participants' rights are protected, and develop individualized housing and service plans, including a path to permanent housing stability once ESG program assistance is no longer available.

Each sub-recipient is required to read and follow ESG guidelines as set forth by HUD. The procedures contained herein serve to simplify the implementation of the regulations and identify allowable activities.

Sub-recipients will serve the population and provide the financial assistance and stabilization services as identified in the budget and scope of work as found in each of their contracts.

Preliminary steps to be taken in implementing the ESG activities are as follows:

All sub-recipients receiving ESG assistance are required to participate in the local Homeless Management Information System (HMIS) or a comparable database and execute all Homeless Management Information System required documents as needed. These sub-recipients are also required to actively participate in the Tucson Pima Collaboration to End Homelessness (TPCH). TPCH is the local Continuum of Care and has over 50 member agencies including the local Veteran Administration, Open Inn, Gospel Rescue Mission, and the Primavera Foundation. TPCH continues to encourage mainstream providers such as the Social Security Administration and the Arizona Department of Economic Security to actively participate. It is suggested that agencies participate in the committees that directly relate to their clients to assist in coordinating services.

In the case of projects that provide housing or services to families, that sub recipients will designate a staff person to be responsible for ensuring that children being served in the program are enrolled in school and connected to appropriate services in the community, including early childhood programs such as Head Start, part C of the Individuals with Disabilities Education Act, and programs authorized under subtitle B of title VII of the Act;

Sub-recipients are required to participate in the centralized or coordinated assessment and intake system when it becomes available in our community.

J HMIS: ESG PROGRAM DATA COLLECTION

Client and services information will be collected and recorded using paper forms, and will be entered into the Homeless Management Information System (HMIS) as described in the Procedures section of this manual. Client data on clients served, housing status, and services received must meet HUD standards of completeness and sufficiency. Staff will follow procedures to enter data into HMIS, and will ensure data quality and completeness. Staff will also keep paper forms in a hard copy client file. Any data or documentation not directly entered into or uploaded to the HMIS will be maintained in the paper file.

Program staff may use client records in HMIS for program verification requirements. For example, if a person presents for services and the intake worker is able to view records in HMIS to confirm that the participant came directly from an emergency shelter (e.g. was in emergency shelter the night before), the intake worker does not need to document housing status (e.g. literally homeless), since the HMIS record provides documentation that the person meets HUD's homeless definition.

If the Program staff member is not able to view the HMIS records for a client, then other documentation will be required, and this will be entered into HMIS

K. PROPERTY VERIFICATIONS AND INSPECTIONS: REQUIREMENTS FOR HOMELESSNESS PREVENTION AND RAPID RE-HOUSING

The ESG Program will conduct housing verifications and inspections as required by HUD.

1. Rent Reasonableness

A rent reasonableness assessment will be conducted by the city/county staff prior to paying back rent and emergency rent assistance for a current or new rental property to ensure the rental rates are fair market rates.

Habitability Inspection

When a re-housing client will move into a new rental, a Habitability Inspection is required to ensure minimum habitability standards and will be conducted by a trained City of Tucson or Pima County inspector. Habitability inspections are also required periodically for emergency shelters.

4. Lead-based Paint

A Lead-based Paint visual inspection is required for housing and shelters and will be conducted by a trained City of Tucson or Pima County inspector. Housing will be inspected when both of the following conditions exist for a household that has been approved to receive financial assistance from Project Action:

- a. The rental property is older than 1978, as shown by Pima County property records; and
- b. The client household includes a child less than 6 years of age.

A lead-based paint inspector must be HUD-certified to do a visual assessment for lead based paint.

5. Repeat Inspections

Inspections will be conducted no more than two times. If unit does not pass inspection, one more inspection can be ordered. If the unit doesn't pass inspection a second time, Emergency

Solutions Grant staff will assist the client to move to another property that will satisfy these requirements.

L. GRIEVANCE POLICY

If a client or prospective client disagrees with an ESG Program decision, he/she will be provided with a clearly-defined grievance process. The client will use the grievance process that is in effect at the contracted provider agency that provided the ESG Program service that the client wishes to dispute.

M. FRAUD PREVENTION AND RESPONSE

1. ESG Program intake forms that are used to determine eligibility must be signed by the client, and have statements adjacent to the signature area that inform clients that untruthful information may be considered as fraudulent and can lead to investigation and punishment under federal law.
2. If a staff member suspects that a client has provides fraudulent information, she will inform her supervisor. If necessary the Supervisor will inform the City and County Program Coordinators. The Program Coordinator can consult with the City Attorney and/or County Attorney, and the HUD Inspector General to resolve and report the matter, or to conduct further investigation or prosecution.

N. CONFIDENTIALITY

The ESG Program protects client confidentiality in the following ways.

1. Most clients interact solely with their case manager and do not have personal contact with other Emergency Solutions Grant personnel. The case manager will keep client names and personal information confidential except as it is necessary to discuss cases with a supervisor or with other Emergency Solutions Grant personnel for the purpose of case coordination.
2. When Emergency Solutions Grant staff communicates about client services via email they will not share names or social security numbers. Instead they use client I.D. codes that are used in HMIS.
3. Emergency Solutions Grant staff members and contracted personnel will sign confidentiality agreements, and will not discuss Emergency Solutions Grant clients with anyone except as necessary with Emergency Solutions Grant staff.
4. HMIS data reports will present project data in aggregate form with no identifying information.
5. HMIS data systems will be encoded so that client information is kept secure.
6. Clients are informed about their rights regarding personal information and sign consent forms:

- Informed Consent form, with accompanying Terms of Service form. By signing this form, the client consents to provide information necessary for determining eligibility and providing services.
- Authorization for Use and Sharing of Information. By signing this form, the client consents to have selected information shared with other providers in order to obtain other services or to coordinate care.
- Client Authorization Form for HMIS data.

O. CONFLICTS OF INTEREST

No person who is an employee, agent, consultant, officer, or elected or appointed official of the City of Tucson or Pima County and who exercises or has exercised any functions or responsibilities with respect to ESG activities, or who is in a position to participate in an ESG decision-making process or gain inside information with regard to such activities, may obtain a personal or financial interest or benefit from the activity, or have an interest in any contract, subcontract, or agreement with respect thereto, or the proceeds there under, either for himself or herself or for those with whom he or she has family or business ties, during his or her tenure or for one year thereafter.

P. NONDISCRIMINATION & EQUAL OPPORTUNITY REQUIREMENTS

The ESG Program will ensure that information about ESG Program assistance is made available to all on a nondiscriminatory basis and ensure that all who seek services are provided equal access using the following methods.

1. Outreach information will be provided to a wide range of services providers and community based organizations.
2. To ensure that outreach materials and services are accessible to persons with limited English proficiency, ESG Program will provide information about the program on both the City and Count Websites as well as maintain a hard copy in the respective offices. Staff members will be available who are bilingual in English and Spanish. When persons seeking services speak languages other than English or Spanish, or have vision or hearing disabilities, ESG Program staff will utilize other translation services to ensure fair access.

Q. AFFIRMATIVELY FURTHERING FAIR HOUSING

The ESG Program will ensure that policies and procedures affirmatively further fair housing opportunities for classes protected under the Fair Housing Act, including race, color, national origin, religion, sex, disability, and familial status. Fair housing procedures will include the following:

1. Marketing the program to all eligible persons, including persons with disabilities and persons with limited English proficiency;
2. Making buildings and communications that facilitate applications and service delivery accessible to persons with disabilities
3. Providing fair housing counseling services or referrals to fair housing agencies;
4. Informing participants of how to file a housing discrimination complaint, including providing the toll-free number for the Housing Discrimination Hotline: 1800-669-9777; and

5. Recruiting landlords and service providers in areas that expand housing choice to program participants.

III. ESG PROGRAM COMPONENT POLICIES

A. STREET OUTREACH

The ESG Program may provide the following services to eligible clients in order to connect unsheltered homeless with emergency shelter, housing, or critical services.

- Engagement
- Case Management
- Emergency health and mental health services
- Transportation
- Services for special populations (special populations include homeless youth, homeless persons with HIV/AIDS, and homeless victims of domestic violence, sexual violence, and stalking).

2) Shelter Stay Procedures

3) Essential Services

4) Shelter Outreach Performance Measures

Number of persons:

- Placed in shelter or safe havens
- With more non-cash benefits at program exit
- Participating in case management

B. EMERGENCY SHELTER

The ESG Program may provide for the following services to maintain or convert homeless shelter sites, provide essential services or assist with shelter operations.

- Case management
- Childcare
- Education
- Employment
- Life skills services
- Legal services
- Health
- Mental health
- Substance abuse services
- Transportation
- Services for special populations
- Operations (e.g., maintenance, utilities, furniture, food)

1) Policy for Admission

2) Policy for Diversion

3) Policy for Referral and Assessment of Needs

4) Policy for Discharge

5) Emergency Shelter Performance Measures

Number of persons:

- Exiting to temporary or transitional housing destinations
- Exiting to permanent housing destinations
- Participating in case management

C. HOMELESSNESS PREVENTION

The ESG Program funds may be used to provide housing relocation and stabilization services and rental assistance to those who earn 30% or less of the Area Median Income. Financial assistance will not be provided to a household for a purpose and time period supported by another public source.

- Housing relocation and stabilization services
- Short-and medium-term rental assistance
- Short-term = up to 3 months
- Medium-term = 4 to 24 months
 - Up to 24 months of rental assistance during any 3-year period, including one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent.
- Moving costs
- Rent application fees
- Security deposits
- Last month's rent
- Utility deposit
- Utility payments
- Housing search/ placement
- Housing stability case management
- Mediation and legal services
- Credit repair/ budgeting/ money management

1) Evaluating Eligibility for Assistance for Homelessness Prevention

Minimum requirements to be eligible for Rapid Re-Housing Assistance:

Client eligibility will be assessed in-person. Appointments will be made with the designated providers. During these appointments the clients will be informed about the resources within their community and offered suggestions.

Clients must meet eligibility requirements and provide documentation described below.

Client must:

1. Clients are permitted to have some assets, e.g. car, retirement plan, with maximum of \$3,000 (not including checking and/or savings).
2. Have resided in Pima County for the past three months or longer.
3. Be either
 1. Homeless (based on current HUD homelessness definition), or
 2. Are about to lose their housing due to scheduled eviction or foreclosure, and have no other networks or resources to avoid homelessness, i.e., would become homeless but for this assistance.
4. Have experienced a sudden and significant change making it hard to pay rent or utilities, and, after a short or medium period of assistance, be likely to sustain stable housing on his/her own. Examples of sudden and significant changes include, but are not limited to:
 1. Sudden loss of income
 2. Unforeseen finance set back or life change
 3. Loss of job or reduced hours
 4. Medical issues
 5. Medical bills caused inability to pay other bills
 6. Car repairs
 7. Student Financial Aid disrupted
 8. Divorce or break up of a relationship
 9. Death in family
 10. Lost roommate or other living arrangements
5. Be willing to participate in a case plan that includes goals for improving his/her situation, such as job search activities.
6. Must provide verification documents:
 1. Picture I.D.
 2. Social Security Card
 3. Birth Certificate
 4. Proof of income
 5. Bank statement
 6. Bills that show cause/ need
 7. Proof of residency
 8. Eviction notice or a copy of the Notice of Trustee's sale and has a written lease agreement or a deed that corresponds with the foreclosure documents
 9. Utility disconnect bill or proof of delinquent amount
 10. Invoice for moving assistance
7. Demonstrates ability to maintain their housing and household expenses after assistance

Examples of Reasons the client eligibility may be denied:

- Client does not meet eligibility requirements listed above
- Client did not provide required verification documents
- Client did not agree to having a case plan, or did not follow steps in case plan
- Client used maximum time or assistance allotment
- There were substantiated landlord complaints, and the client did not comply with a correction plan.

- All sub-grantees must evaluate and certify the eligibility of ESG program participants at least once every three months for all household receiving homelessness prevention assistance, and once annually for households receiving rapid re-housing assistances
 - Initial Consultation
 - Sub-recipients must conduct an initial evaluation to determine the eligibility of each individual or family's eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
 - Documentation to verify requirements of this section have been met including completing a client in-take form. All sub-grantees must keep verification of this requirement in each client file.
 - Sub-grantees must verify Income below 30% the Area Median Income.
 - Verification of Homelessness or Risk of Homelessness using the HUD definition as described in Section II. B.
 - The sub-grantee must confirm that the individual or family does not have sufficient resources or support networks.
 - To receive assistance under Homeless Prevention, a client(s) must be *at risk of becoming homeless* and rental assistance is only necessary to prevent the individual or family from moving into an emergency shelter or another place.

2) Determining and Prioritizing Homeless Prevention Assistance

The purpose of the ESG program is to provide assistance to as many individuals and families who face obstacles to sustaining housing as possible. An individual or family's ability to sustain housing is not a threshold requirement. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends.

Sub-grantees will target assistance to families and individuals who are homeless or who are about to spend their first night at in a shelter or on the street. These families and individuals will be prioritized as follows.

Priority 1: Homeless Families

- Priority 1(a): The homeless family who is in the emergency shelter for less than 30 days
- Priority 1(b): The homeless family who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
- Priority 1 (d): The homeless family or who has been living on the streets for over 30 days

Priority 2: Homeless Youth

- Priority 2(a): The homeless youth who is in the emergency shelter for less than 30 days
- Priority 2(b): The homeless youth who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 2 (c): the homeless youth who has been in the emergency shelter for over 30 days
- Priority 2 (d): The homeless youth or who has been living on the streets for over 30 days

Priority 3: Homeless Individual

- Priority 3(a): The homeless individual who is in the emergency shelter for less than 30 days
- Priority 3(b): The homeless individual who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 3 (c): the homeless individual who has been in the emergency shelter for over 30 days
- Priority 3 (d): The homeless individual or who has been living on the streets for over 30 days

3) Rent & Utilities Policy: Homeless Prevention

Rent

Sub-grantees will require program participants to pay a portion of the rent expense based on the individual or families' available income (up to thirty percent 30%). Participants are expected to contribute a portion of their income to pay for rent. Household income and rent contribution will be calculated based on household available income at the time of certification. Any household income increase must be reported to the sub-grantee within seven (7) days and the new rent contribution amount adjusted. Income shall be reassessed every three months for medium term rental assistance.

Sub-grantees may increase the household's contribution to the rent and utility cost as they acquire more financial independence and stability. An increase will be documented in the client's plan.

Rental assistance may be used to pay up to 3 months of rental arrears for eligible program participants. Rental arrears may be paid if the payment enables the program participant to return to the housing unit for which the arrears are being paid or move to another unit.

Rental arrears may be paid regardless of when they were incurred, provided that the existence of arrears prevents the eligible participant from obtaining housing. Payment for rental arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 24 months in a 3 year period.

Rental assistance cannot exceed the actual rental costs. Rental assistance payments cannot be made on behalf of eligible participants for the same period of time that rental assistance is being provided through another federal, state or local housing subsidy program.

Sub-grantees providing rental assistance for homeless prevention will be required to conduct initial and any appropriate follow-up habitability inspections of housing units into which a program participant will be moving. Units must be inspected on an annual basis and upon a change of tenancy. In addition, Lead Based Paint requirements must be met when applicable.

When a rental unit has been located, sub-grantees may need to assist the client in contacting the landlord to complete the appropriate paperwork and conduct a habitability standards inspection. Agencies must have acceptable documentation showing a participant in need of rental assistance. Documentation may be in the form of an eviction notice from a landlord or a letter stating intent to evict.

Sub-grantees must use fair market rent standard to determine eligibility. Sub-grantees should assist program participants to locate a rental unit at or below fair market rent.

Security Deposits and Utility Deposits

ESG Program funds may be used to pay security deposits and utility deposits. Security and utility deposits may only be paid with ESG funding if the program participant will otherwise be homeless without assistance.

Security and utility deposits covering the same period of time in which other assistance is being provided through another housing subsidy program are eligible, as long as they cover different costs types.

Security and utility deposits may be paid as a one-time grant not to exceed the monthly rental amount. Information documenting the need for a security deposit should be obtained at the same time the required rental paperwork is being completed by the client and landlord.

Sub-grantees must conduct a habitability standards inspection on any unit that a program participant will be moving into using ESG program funds for a security or utility deposit. Agencies must certify that the unit has passed habitability standards before any ESG program funds will be released.

Utility Payments

ESG Program funds may be used for up to 6 months of utility payments, including up to 3 months of utility payments in arrears. The program participant, or a member of the participant's household, must have an account in his/her name with a utility company. The participant must have a lease with their name on it to prove residency and verify address of utility service. Copies of the proof of responsibility should be obtained and maintained in the client file. Utility payments will be made directly to the utility company. Documentation must be made to verify that the participant is not receiving the same type of assistance from another agency for the same period. Also, if utility assistance payments are available from another agency this source should be used first before ESG funds are provided.

4. Standards for Determining Length and Level of Assistance for Homeless Prevention

- No participant may receive more than 24 months of assistance within a 3 year period.
- The maximum amount of assistance is based on FMR less the households 30% of monthly income.
- The maximum number of times the program participant may receive assistance is based on need but may not exceed more than 24 months of assistance in a 3 year period.
- Short-term rental assistance is to be limited to a maximum of 3 months of rent
- Medium-rental assistance shall extend for more than 3 months but not more than 24 months of rent.
- Only the assistance that is needed for a client to become stabilized will be provided.

5. Homeless Prevention Performance Standards

Number of persons:

- Who maintained their permanent housing for 6 months or longer
- Exiting to permanent housing destinations
- With higher income at program exit
- With more non-cash benefits at program exit
- Participating in case management

D. RAPID REHOUSING

The ESG Program can be utilized to fund housing relocation and stabilization services and rental assistance to individuals and families who can quickly be transitioned into permanent housing and a stable environment. Financial assistance will not be provided to a household for a purpose and time period supported by another public source.

- Housing relocation and stabilization services
- Short-and medium-term rental assistance
 - Short-term = up to 3 months
 - Medium-term = 4 to 24 months
 - Up to 24 months of rental assistance during any 3-year period, including one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent.
- Moving costs
- Rent application fees
- Security deposits
- Last month's rent
- Utility deposit
- Utility payments
- Housing search/ placement
- Housing stability case management
- Mediation and legal services
- Credit repair/ budgeting/ money management

1) Evaluating Eligibility for Assistance for Rapid Re-Housing

Minimum requirements to be eligible for Rapid Re-Housing Assistance:

Client eligibility will be assessed in-person. Appointments will be made with the designated providers. During these appointments the clients will be informed about the resources within their community and offered suggestions.

Clients must meet eligibility requirements and provide documentation described below.

1. Clients are permitted to have some assets, e.g. car, retirement plan, with maximum of \$3000 in liquid assets (readily available money).

2. Have resided in Pima County for the past three months or longer.
3. Be either
 1. Homeless (based on current HUD homelessness definition), or
 2. Are about to lose their housing due to scheduled eviction or foreclosure, and have no other networks or resources to avoid homelessness, i.e., would become homeless but for this assistance.
4. Have experienced a sudden and significant change making it hard to pay rent or utilities, and, after a short or medium period of assistance, be likely to sustain stable housing on his/her own. Examples of sudden and significant changes include, but are not limited to:
 1. Sudden loss of income
 2. Unforeseen finance set back or life change
 3. Loss of job or reduced hours
 4. Medical issues
 5. Medical bills caused inability to pay other bills
 6. Car repairs
 7. Student Financial Aid disrupted
 8. Divorce or break up of a relationship
 9. Death in family
 10. Lost roommate or other living arrangements
5. Be willing to participate in a case plan that includes goals for improving his/her situation, such as job search activities.
6. Must provide verification documents:
 1. Picture I.D.
 2. Social Security Card
 3. Birth Certificate
 4. Proof of income
 5. Bank statement
 6. Bills that show cause/ need
 7. Proof of residency
 8. Eviction notice or a copy of the Notice of Trustee's sale and has a written lease agreement or a deed that corresponds with the foreclosure documents
 9. Utility disconnect bill or proof of delinquent amount
 10. Invoice for moving assistance
7. Demonstrates ability to maintain their housing and household expenses after assistance

Examples of Reasons the client eligibility may be denied:

- Client does not meet eligibility requirements listed above
- Client did not provide required verification documents
- Client did not agree to having a case plan, or did not follow steps in case plan
- Client used maximum time or assistance allotment

- There were substantiated landlord complaints, and the client did not comply with a correction plan.
- All sub-grantees must evaluate and certify the eligibility of ESG program participants at least once every three months for all household receiving homelessness prevention assistance, and once annually for households receiving rapid re-housing assistances
 - Initial Consultation
 - Sub-recipients must conduct an initial evaluation to determine the eligibility of each individual or family’s eligibility for ESG assistance and the amount and types of assistance the individual or family needs to regain stability in permanent housing.
 - Documentation to verify requirements of this section have been met include completing a client in-take form. All sub-grantees must keep verification of this requirement in each client file.
 - Verification of Homelessness or Risk of Homelessness using the HUD definition as described in Section II. B.
 - The sub-grantee must confirm that the individual or family does not have sufficient resources or support networks.
 - To receive assistance under HOMELESSNESS PREVENTION client(s) must be *at risk of becoming homeless* and rental assistance is only necessary to prevent the individual or family from moving into an emergency shelter or another place.

2) Determining and Prioritizing Rapid Re-Housing Assistance

The purpose of the ESG program is to provide homeless prevention assistance to as many homeless individuals and families who face obstacles to obtaining and sustaining housing as possible. An individual or family’s ability to sustain housing is not a threshold requirement. The program will focus on helping individuals and families overcome their immediate housing obstacles and connect them with the resources they need to stay housed when the program ends.

Sub-grantees will target assistance to families and individuals who are homeless or who are about to spend their first night at in a shelter or on the street. These families and individuals will be prioritized as follows.

Priority 1: Homeless Families

- Priority 1(a): The homeless family who is in the emergency shelter for less than 30 days
- Priority 1(b): The homeless family who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 1 (c): the homeless family who has been in the emergency shelter for over 30 days
- Priority 1 (d): The homeless family or who has been living on the streets for over 30 days

Priority 2: Homeless Youth

- Priority 2(a): The homeless youth who is in the emergency shelter for less than 30 days
- Priority 2(b): The homeless youth who has been living on the streets (places not meant for human habitation) for less than 30 days

- Priority 2 (c): the homeless youth who has been in the emergency shelter for over 30 days
- Priority 2 (d): The homeless youth or who has been living on the streets for over 30 days

Priority 3: Homeless Individual

- Priority 3(a): The homeless individual who is in the emergency shelter for less than 30 days
- Priority 3(b): The homeless individual who has been living on the streets (places not meant for human habitation) for less than 30 days
- Priority 3 (c): the homeless individual who has been in the emergency shelter for over 30 days
- Priority 3 (d): The homeless individual or who has been living on the streets for over 30 days

3) Rent & Utilities Policy: Rapid Re-Housing

Rent

Sub-grantees will require program participants to pay a portion of the rent expense based on the individual or families' available income thirty percent (30%) or less. Participants are expected to contribute a portion of their income to pay for rent. Household income and rent contribution will be calculated based on household available income at the time of certification. Any household income increase must be reported to the sub-grantee within seven (7) days and the new rent contribution amount adjusted. Income shall be reassessed every three months for medium term rental assistance.

Sub-grantees may increase the household's contribution to the rent and utility cost as they acquire more financial independence and stability. An increase will be documented in the client's plan.

Rental assistance may be used to pay up to 3 months of rental arrears for eligible program participants. Rental arrears may be paid if the payment enables the program participant to return to the housing unit for which the arrears are being paid or move to another unit.

Rental arrears may be paid regardless of when they were incurred, provided that the existence of arrears prevents the eligible participant from obtaining housing. Payment for rental arrears must be included in determining the total period of the program participant's rental assistance, which may not exceed 24 months in a 3 year period.

Rental assistance cannot exceed the actual rental costs. Rental assistance payments cannot be made on behalf of eligible participants for the same period of time that rental assistance is being provided through another federal, state or local housing subsidy program.

Sub-grantees providing rental assistance for rapid re-housing will be required to arrange initial and any appropriate follow-up habitability inspections of housing units into which a program participant will be moving. Units must be inspected on an annual basis and upon a change of tenancy. In addition, Lead Based Paint requirements must be met when applicable.

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- Medium-rental assistance shall extend for more than 3 months but not more than 24 months of rent.
- Only as much assistance needed to become stabilized will be provided.

5) Rapid Re-Housing Performance Standards

Number of persons:

- Who maintained their permanent housing for 6 months or longer
- Exiting to permanent housing destinations
- With higher income at program exit
- With more non-cash benefits at program exit
- Participating in Case Management

E. INELIGIBLE SERVICES NOT PROVIDED BY THE ESG PROGRAM

- Mortgage costs
- Credit card bills or other consumer debt
- Pet care
- Entertainment activities
- Cash assistance directly to participants

F. TERMINATION OF ASSISTANCE

A sub-grantee may terminate assistance to a program participant who violates program requirements. Sub-grantees may resume assistance to a program participant whose assistance was previously terminated. In terminating assistance to a program participant, the sub-grantee must provide a formal process that recognizes the rights of individuals receiving assistance to due process of law.

For Homeless Prevention and Rapid Re-Housing rental assistance the process of termination, at minimum, must consist of:

- A. Written notice to the program participant containing a clear statement of the reasons for terminations;
- B. A review of the decision, in which the program participant is given the opportunity to present written or oral objections before a person other than the person who made or approved the termination decisions; and
- C. Prompt written notice of the final decision to the program participant

IV. ESG PROGRAM ADMINISTRATION

3. Procedures for Annual Plan and CAPER Reports
4. Use of IDIS
5. Monitoring Direct Service Contractors
 - a. Purpose
 - b. Frequency
 - c. Findings
 - d. Follow-up Procedures

V. SUMMARY OF ESG PROGRAM PERFORMANCE STANDARDS

Pima County and the City of Tucson in consultation with the Continuum of Care will develop performance standards that will provide measures to evaluate the effectiveness of 1) Targeting

those who need the assistance the most; 2) reducing the number of people living on the streets and emergency shelters; 3) shortening the time people spend homeless; and 4) reducing each program participant's housing barriers or housing stability risks.

ESG Program Performance Standards	
Activity	Outcome/ Outputs
Street Outreach	Number of persons: <ul style="list-style-type: none"> • Placed in shelter or safe havens • With more non-cash benefits at program exit • Participating in case management
Emergency Shelter	Number of persons: <ul style="list-style-type: none"> • Exiting to temporary or transitional housing destinations • Exiting to permanent housing destinations • Participating in case management
Homelessness Prevention	Number of persons: <ul style="list-style-type: none"> • Who maintained their permanent housing for 6 months or longer • Exiting to permanent housing destinations • With higher income at program exit • With more non-cash benefits at program exit • Participating in case management
Rapid Re-Housing	Number of persons: <ul style="list-style-type: none"> • Who maintained their permanent housing for 6 months or longer • Exiting to permanent housing destinations • With higher income at program exit • With more non-cash benefits at program exit • Participating in Case Management