

WORKING DRAFT – last updated January 13, 2021

WASHTENAW COUNTY
EMERGENCY SOLUTIONS
GRANTS PROGRAM
WRITTEN STANDARDS

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Introduction

Washtenaw County has developed the following standards for administration of Emergency Solutions Grants (ESG) funds allocated directly to Washtenaw County by the U.S. Department of Housing and Urban Development (HUD), as required by 24 CFR 576.400 (e). These standards were created in coordination with the Washtenaw County Continuum of Care. They are in accordance with the interim rule for the Emergency Solutions Grants Program released by HUD on April 1, 2017 (see [24 CFR Part 576](#)), the [final rule](#) for the definition of homelessness released on December 4, 2011, and [Notice CPD-20-08: Waivers and Alternative Requirements for the Emergency Solutions Grants ESG Program Under the CARES Act \(ESG-CV Notice\)](#), released on September 1, 2020.

The Washtenaw County Office of Community and Economic Development (OCED) serves as fiduciary on HUD ESG funds, including ESG funds authorized by the Coronavirus Aid, Relief, and Economic Security (CARES) Act (referred to as ESG-CV funds). The Standards serve as the guiding principles for HUD ESG- and ESG-CV-funded programs. OCED expects that the standards will adjust as Washtenaw County gains more experience with and collects more data from services provided under the ESG program.

Overarching Standards & Commitments for All Subrecipients

Subrecipients agree to the below standards and expectations for all ESG-funded activities. Adherence to CoC-wide commitments and standards is monitored by OCED in several ways: committee review (e.g. evaluations), OCED compliance monitoring as ESG fiduciary, and review and scoring of projects during ESG funding competitions. For more information on CoC standards, see the [CoC's Coordinated Entry Policies & Procedures](#) and the [CoC's Overarching Policies & Procedures](#).

Commitment to Racial Equity

As stated in the [CoC Equity Statement](#), “the CoC aims to intentionally and meaningfully engage with issues of racial equity in the homelessness response system to create positive, transformational change across the CoC. This includes working towards equitable access to CoC services and achieving just outcomes, as well as realizing the CoC’s capacity to address the impacts of inequities left by public systems tangential to homelessness.” ESG subrecipients and the CoC commits to advancing racial equity in their programs and across the system by:

- Providing and participating in ongoing training opportunities for staff to deepen their understanding and analysis of racism and oppression and strengthen their knowledge and practice of equity;
- Engaging in CoC equity initiatives, including workgroups and committees, trainings, and organizational and systems assessments;
- Adopting hiring practices and procedures that encourage diversity and reach BIPOC applicants, and continuously evaluating those practices and procedures to ensure staff are reflective of the communities they serve and to promote equity and organizational accountability;
- Cultivating talent, leadership, and retainment of BIPOC staff.

and participating in CoC equity initiatives.

Compliance with the Violence Against Women Act (VAWA)

The Violence Against Women Act (VAWA) provides protections for victims of domestic violence, dating violence, sexual assault, or stalking. VAWA protections are not only available to women, but are available equally to all individuals regardless of sex, gender identity, or sexual orientation. Washtenaw County Continuum of Care (WC CoC) considers the safety of its tenants seriously, including the safety of tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with VAWA, all permanent housing providers who provide Emergency Solutions Grant (ESG)-funded rental assistance are required to comply with VAWA, including allowing tenants who are victims to request an emergency transfer from the tenant's current unit to another unit. For more information, see the [Washtenaw County CoC Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking](#).

Education

The educational needs of children and youth must be accounted for, to the maximum extent practicable, and families with children and unaccompanied youth must be placed as close as possible to the school of origin so as not to disrupt the children's education. Projects that serve homeless families with children and/or unaccompanied youth must have policies and practices in place that are consistent with the laws related to providing education services to children and youth. These recipients must have a designated staff person to ensure that children and youth are enrolled in school and receive education services. Homeless families with children and unaccompanied youth must be informed of their eligibility for McKinney-Vento education services and other available resources. Recipients shall maintain documentation in the participant's case file to demonstrate that these requirements have been met and that applicants and participants understand their rights.

Fair Housing, Equal Access, and Non-Discrimination

All ESG-funded services must be available to all eligible persons, regardless of actual or perceived race, color, national origin, religion, sex, age, familial status, disability, actual or perceived sexual orientation, gender identity, marital status, height, or weight.

OCED and its partners will take all necessary steps to ensure that housing and services are administered in accordance with all applicable Federal, State, and local civil rights laws, including, but not limited to: *Fair Housing Act; Section 504 of the Rehabilitation Act; Title VI of the Civil Rights Act; Title II of the Americans with Disabilities Act Title III of the Americans with Disabilities Act; HUD's Equal Access in Accordance with Gender Identity Rule; and Michigan's Elliott-Larsen Civil Rights Act.*

All clients shall be informed of their right to access housing and services without discrimination, and of their right to initiate a grievance process if they believe they have been discriminated against.

Housing First

All subrecipients agree to the principles of [Housing First](#). The US Department of Housing and Urban Development (HUD) defines Housing First as “[a program that] offers individuals and families experiencing homelessness immediate access to permanent affordable or supportive housing, without clinical prerequisites like completion of a course of treatment or evidence of sobriety and with a low-threshold for entry.” ESG-funded programs must not require program participants participate in other services to receive housing assistance.

Participation in CoC Initiatives

All subrecipients agree to attend CoC- and ESG-required trainings and community meetings to provide consistent services across the Continuum that are based on best practices. In addition, all subrecipients must coordinate with other ESG-funded agencies to ensure effective and quality service delivery, including participation on the Continuum of Care’s Coordinated Entry Oversight & Evaluation Committee.

Participation in the Homeless Management Information System (HMIS)

All subrecipients commit to real-time HMIS data entry, except those agencies that are exempt, such as domestic violence shelters, who must use a comparable database. If the subrecipient is exempt from using HMIS, it must establish and operate a comparable database that collects client-level data over time (*i.e.*, longitudinal data) and generates unduplicated aggregate reports based on the data. Further, all partners agree to routinely review and correct HMIS data quality issues, monitor outcome performance, and adhere to ESG HMIS reporting requirements.

Persons with Limited English Proficiency

Subrecipients will take reasonable steps to ensure meaningful access to their programs and activities for persons who are limited in their English proficiency, regardless of national origin. Such steps may include translating marketing materials and documents essential to providing services into languages prevalent in the community, as well as providing language assistance while providing services, including oral and written translation where appropriate.

Preventing Family Separation

Families experiencing homelessness should not be separated when receiving services unless the health and wellbeing of children are at immediate risk. The age and gender of a child under the age of 18 shall not be used as a basis for denying a family’s admission to any housing services. In addition, a broad definition of family must be used that allows for single parent households of any gender identity, two parent households including same sex parents and LGBT parents, and extended families to be served together with their children. Furthermore, in compliance with HUD’s Equal Access in Accordance with Gender Identity Rule, all households that present as a family must be served together as a family, whether that family includes adults and children, or just adults, and regardless of the age, disability, marital status, actual or perceived sexual orientation, or gender identity of any member of the family.

Standards for Case Management

When utilizing ESG funding for case management under any program component, subrecipients agree to adhere to client-centered, housing first practices. This includes: case

management services are comprehensive and highly flexible, seeking to meet households where they are and assisting the household along the stages of change; services are strengths-based; services are consumer-driven, respecting client right of self-determination; and services respect client choice and promote autonomy. Staff will utilize principles of harm reduction and practice trauma-informed care when engaging with program participants.

Utilization of Coordinated Entry & Common Assessment Tool

Housing Access for Washtenaw County (HAWC) has served as the CoC's coordinated entry agency since 2011. HAWC and its partners are committed to working together to utilize scarce housing and homeless resources in the most targeted and efficient manner possible.

ESG subrecipients commit to access and deliver housing and homelessness services as appropriate through the coordinated entry system. This includes utilizing HAWC as the main entry point to the homelessness system. Subrecipients agree that all households must first be screened by HAWC. Households are then assessed by the appropriate agency and referred to housing resources based on housing situation, acuity, and vulnerability in accordance with local prioritization. This also includes receiving referrals for permanent housing resources through the Community Housing Prioritization (CHP) Committee.

Literally homeless assessments include the administration of common assessment tool the Vulnerability Index - Service Prioritization Decision Assistance Tool (VI-SPDAT) tool. The tool is not only used to determine acuity and housing and service needs, but also to provide a common approach to prioritize households for housing program referrals using the CHP process. The version of the VI-SPDAT used depends on whether a family, individual, or transition age youth (aged 24 and under) are being assessed. All subrecipients agree to the utilization of the VI-SPDAT tool to assess literally homeless households.

The VI-SPDAT is designed to quickly assess the health and social needs of those experiencing homelessness and helps identify the best type of support and housing intervention by relying on three categories of housing intervention recommendation as shown below.

When a household's VI-SPDAT score is not reflective of the severity of vulnerabilities, the household may be moved to a place on the CHP list that more accurately reflects their vulnerability and needs. This is decided on a case-by-case basis by a standing CHP subcommittee called the VI-SPDAT Score Review Committee. The intent of this committee is to build capacity and be more proactive and strategic. Subcommittee members are able to discuss households more in depth than a full committee would allow, including discussing strategic housing plans.

ESG Program Components

ESG-funded program components include emergency shelter, homelessness prevention, rapid re-housing, HMIS, and administration. Subrecipients may only use ESG funding to engage in the program components indicated in their funding award and must follow the respective guidelines below. Subrecipients seeking to use ESG funds to engage in activities under another program component must first consult with OCED. All activities must comply with the written standards, 24 CFR Part 576, and Notice CPD-20-08.

Emergency Shelter

ESG funds may be used to support essential services and operations of emergency shelters. Requirements for activities under this program component are outlined below.

Intake, Referral, & Assessment

Individuals and families may access shelter by contacting HAWC. Individuals may also access shelter by contacting Shelter Association of Washtenaw County (SAWC). Youth up to age 24 may also access shelter by contacting Ozone House, and survivors of domestic violence may also access shelter by contacting SafeHouse Center. HAWC (or the alternate access point) completes an initial intake assessment to determine literal homelessness status and conducts a health vulnerability screening if applicable. Depending on bed availability and need, HAWC will refer literally homeless households to the appropriate shelter resource. Upon referral to shelter, staff will administer the VI-SPDAT assessment to determine prioritization for permanent housing.

Eligibility & Prioritization

ESG-funded non-congregate shelter resources, such as hotel rooms, will be prioritized for the most medically vulnerable. To be eligible for non-congregate shelter resources, persons must meet both of the following:

- Literally homeless (HUD Category 1: has a primary nighttime residence not meant for human habitation, is staying in a shelter, or is exiting an institution and resided in a shelter or a place not meant for human habitation immediately prior to entering that institution)
- Meet the Centers for Disease Control & Prevention (CDC) At Risk criteria OR be identified by a medical professional

Non-Congregate shelter opportunities will be offered in the following order:

1. Persons identified by a medical professional
2. At-risk persons currently in a congregate setting
3. At-risk persons identified by Street Outreach
4. At-risk persons identified through coordinated entry

Data on local need will determine the proportion of non-congregate shelter resources dedicated to individuals, youth, and families. In the event that there are more eligible persons than space available, the following tiebreakers should be used to determine who should be prioritized.

- Higher number of at-risk persons in household
- Other medical or mental health issues
- Unable to stay in congregate setting (due to behavioral or other issues)

Depending on bed availability, prioritization criteria may be narrowed to ensure the most at-risk are prioritized. In the event that space is available and no one meeting the above is in need of shelter, other literally homeless persons may be served.

All other shelter resources will be prioritized based on established triage protocols.

Diversion/Housing Problem-Solving

Wherever possible, shelter providers will practice diversion/housing problem-solving to assist clients in identifying alternatives to entering the shelter system. This includes, but is not limited to, assisting households to stay with friends or family. Diverted households may be eligible for homelessness prevention financial assistance to assist them to move into permanent housing.

Eligible Costs

ESG funds may support costs of providing essential services to homeless families and individuals in emergency shelters and operating emergency shelters.

Essential Services

- (1) *Case Management.* The cost of assessing, arranging, coordinating, and monitoring the delivery of individualized services to meet the needs of the program participant is eligible. Services and activities consist of:
 - Use of centralized assessments
 - Conducting initial evaluation
 - Counseling
 - Developing, securing, and coordinated services and obtaining Federal, State, and local benefits
 - Monitoring and evaluating program participant progress
 - Providing information and referrals to other providers
 - Providing ongoing risk assessment and safety planning with victim of domestic violence, dating violence, sexual assault, and stalking
 - Developing an individualized housing and service plan, including a path to permanent housing stability
- (2) *Transportation.* Eligible costs consist of the transportation costs of a program participant's travel to and from medical care, employment, child care, or other eligible essential services facilities. These costs include the following:
 - The cost of a program participant's travel on public transportation
 - If service workers use their own vehicles, mileage allowance for service workers to visit program participants
 - The cost of purchasing or leasing a vehicle for the recipient or subrecipient in which staff transports program participants and/or staff serving program participants, and the cost of gas, insurance, taxes, and maintenance for the vehicle; and
 - The travel costs of recipient or subrecipient staff to accompany or assist program participants to use public transportation.
- (3) *Services for Special Populations.* ESG funds may be used to provide services for homeless youth, victim services, and services for people living with HIV/AIDS, so long as the costs of providing these services are eligible. The term victim services means services that assist program participants who are victims of domestic violence, dating violence, sexual assault, or stalking, including services offered by rape crisis centers and domestic violence shelters, and other organizations with a documented history of effective work concerning domestic violence, dating violence, sexual assault, or stalking.

Shelter Operations

Eligible costs are the costs of maintenance (including minor or routine repairs), rent, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, subrecipients may pay for a hotel or motel room directly or through a voucher. Hotel accommodations may also be provided to individuals and families receiving rapid re-housing under CoC or ESG programs, receiving ESG homelessness prevention assistance, or residing in permanent supportive housing as needed to prevent the spread of coronavirus (for example, when a participant needs to isolate to keep from spreading the virus to other shelter occupants or household members). Shelter operations costs also include cleaning of hotel rooms used by program participants, as well as to repair damages caused by program participants above normal wear and tear.

Connecting Program Participants to Mainstream and Other Resources

The recipient and its subrecipients must assist each program participant, as needed, to obtain:

- Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including: Medicaid, Supplemental Nutrition Assistance Program, Women, Infants and Children (WIC), Federal-State Unemployment Insurance Program, Social Security Disability Insurance (SSDI), Supplemental Security Income (SSI), Child and Adult Care Food Program, Section 9 Public Housing programs, Section 8 Public Housing programs, Supportive Housing for Persons with Disabilities, HOME Investment Partnerships Program, Temporary Assistance for Needy Families, Health Center Program, State Children’s Health Insurance Program, Head Start, Mental Health and Substance Abuse Block Grants, and services funded under the Workforce Investment Act.

Homelessness Prevention

The sections below detail requirements and eligible costs for administering ESG homelessness prevention dollars. In addition to the parameters below, subrecipients must complete all required forms as outlined in Appendix A and follow all applicable standards in Appendix C.

Intake, Assessment, and Eligibility

All households must receive an intake screening by a trained assessor to determine the appropriate housing intervention. This includes an initial assessment of homelessness status and income level. Households must meet the below criteria **at program intake** to be eligible for ESG homelessness prevention (including eviction prevention) programs. See Appendix D for definitions of homelessness.

- **HUD Category 2 Definition of Homeless** (At Imminent Risk of Homelessness); **OR**
- **HUD Category 3 Definition of Homeless** (Homeless under other Federal Statutes); **OR**

- **HUD Category 4 Definition of Homeless** (Fleeing/Attempting to Flee Domestic Violence);
OR
- **At Risk of Homelessness**, as defined by HUD;

AND

- Meet income criteria (household income is **below 30 percent AMI for ESG** and **below 50 percent AMI for ESG-CV**)

In addition to the basic eligibility criteria above, households must receive the Washtenaw County Homelessness Prevention Screening Tool. Households must score in the appropriate point range to receive ESG homelessness prevention assistance. The tool is used to assess household need, based on vulnerability factors and predictors of homelessness, and to prioritize the limited homelessness prevention resources for those most in need. Household score on the tool will determine the level and type of assistance received.

Youth seeking homelessness prevention services through HAWC should be referred to Ozone House as long as assistance is available. Youth receiving homelessness prevention services from Ozone House do not need to be screened using the Prevention Tool. If and when youth-specific funding is no longer available, youth can access homelessness prevention resources through HAWC, subject to the same prioritization criteria as other households. If youth access homelessness prevention services through HAWC, they must be screened using the Homelessness Prevention Screening Tool.

Diversion/Housing Problem-Solving

Attempts at diversion/housing problem-solving will happen upon intake at HAWC and SAWC and throughout the household’s stay in shelter to assist clients in identifying alternatives to entering the shelter system and to resolve their housing crisis. This includes, but is not limited to, assisting households to stay with friends or family. Diverted households may be eligible for homelessness prevention financial assistance to assist them to move into permanent housing, subject to the homelessness prevention eligibility criteria (i.e., meets income requirements and is eligible under Category 2, 3, or 4, or At Risk of Homelessness).

Eligible Costs

Eligible costs under the homelessness prevention program component include housing relocation and stabilization services and short- and/or medium-term rental assistance. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing.

Housing Relocation and Stabilization Services

Households who meet the eligibility criteria may receive supportive services, including housing search & placement and housing stability case management. Program participants must meet with a case manager at least monthly if receiving ongoing assistance. Eligible activities are described below.

- (1) *Financial assistance costs.* ESG homelessness prevention funds may be used to pay housing owners, utility companies, and other third parties for the following costs:
 - *Rental application fees:* up to 3 application fees per household

- *Security deposits*: equal to no more than 1.5 months' rent
- *Last month's rent*: if necessary to obtain housing for a program participant, subrecipients may pay a program participant's last month's rent; it cannot exceed the cost of one month's rent and must be paid to the landlord at the time of first month's rent and security deposit.
- *Moving costs*: ESG funds may pay for moving costs *only where necessary to avoid eviction*. This can include truck rental or hiring a moving company; this assistance may also include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program participant begins receiving assistance and before the program participant moves into permanent housing; payment of temporary storage fees in arrears is not eligible.
- *Landlord incentives*: ESG funds may be used for landlord incentives as reasonable and necessary to obtain housing for individuals and families; total landlord incentive payments cannot exceed three times the rent charged for the unit. Eligible landlord incentives include:
 - i. Signing bonuses up to \$400.00 (must be a year lease);
 - ii. Paying the cost to repair damages incurred by the program participant not covered by the security deposit, up to \$900.00 for one-bedroom or \$2,000.00 for two bedroom or larger units, and cannot exceed the cost of one month's rent;
 - iii. Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.
- If a program participant receiving short- or medium-term rental assistance meets the conditions for an emergency transfer under VAWA, ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer.

ESG funds cannot be provided to a program participant who is receiving the same type of assistance through other public sources. **Total financial assistance allowable per household under homelessness prevention is capped at \$3,000 annually.** This includes both housing relocation & stabilization services financial assistance costs and short- and/or medium-term rental assistance (see below).

Assisted units are subject to Lead-Based Paint requirements and Habitability and Occupancy Standards.

- (2) *Housing search and placement*. Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing:
- Assessment of housing barriers, needs, and preferences
 - Development of an action plan for locating housing
 - Housing search
 - Outreach to and negotiation with owners
 - Assistance with submitting rental applications and understanding leases
 - Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness
 - Assistance with obtaining utilities and making moving arrangements
 - Tenant counseling

(3) *Housing stability case management.* Services or activities related to assessing, arranging, coordinating, and monitoring the delivery of individualized services.

Component services and activities consist of:

- Using the centralized or coordinated assessment to evaluate households receiving assistance
- Conducting the initial evaluation, including verifying and documenting eligibility
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Conducting recertifications

(4) *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.

(5) *Legal services.* ESG funds may pay for legal the legal services, provided that the services are 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.

- Emergency Solutions Grant (ESG) funds may be used only for these services to the extent that other appropriate legal services are unavailable or inaccessible within the community.
- Eligible subject matters are child support, guardianship, paternity, emancipation, and legal separation, orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking, appeal of veterans and public benefit claim denials, the resolution of outstanding criminal warrants, and landlord/tenant matters.

Short- and/or Medium-Term Rental Assistance

Households who meet the eligibility criteria may also receive short- and/or medium-term rental assistance. ESG funds cannot be provided to a program participant who is receiving the same type of assistance through other public sources. **Total financial assistance allowable per household under homelessness prevention is capped at \$3,000 annually.** This includes both housing relocation & stabilization services financial assistance costs and short- and/or medium-term rental assistance.

Subrecipients may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may include short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance:

- Short-term rental assistance: assistance for up to 3 months of rent

- Payment of rental arrears: one-time payment for up to **6 months of rent** in arrears, including any late fees on those arrears

All rental assistance payments must be made directly to the landlord. Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving rental assistance through other public sources. (However, these program participants are eligible for other financial assistance costs under housing relocation & stabilization services, such as rental application fees, security deposits, and moving costs.)

Assisted units are subject to FMR and Rent Reasonableness standards, Lead-Based Paint requirements, and Habitability and Occupancy Standards.

Connecting Program Participants to Mainstream and Other Resources

The recipient and its subrecipients must assist each program participant, as needed, to obtain:

- Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including: Medicaid, Supplemental Nutrition Assistance Program, Women, Infants and Children (WIC), Federal-State Unemployment Insurance Program, Social Security Disability Insurance (SSDI), Supplemental Security Income (SSI), Child and Adult Care Food Program, Section 9 Public Housing programs, Section 8 Public Housing programs, Supportive Housing for Persons with Disabilities, HOME Investment Partnerships Program, Temporary Assistance for Needy Families, Health Center Program, State Children's Health Insurance Program, Head Start, Mental Health and Substance Abuse Block Grants, and services funded under the Workforce Investment Act.

Rapid Re-Housing

The sections below detail requirements and eligible costs for administering ESG Rapid Re-Housing (RRH) dollars. In addition to the parameters below, subrecipients must complete all required forms as outlined in Appendix A and follow all applicable standards in Appendix C.

Intake, Assessment, and Eligibility

All households must be screened by HAWC to determine homelessness status and health vulnerability as applicable. After HAWC intake, literally homeless households will be referred to the appropriate agency for the VI-SPDAT assessment. The assessment score will be used to determine the household's level of need and inform appropriate housing intervention.

Households must meet the below criteria at the time of referral to be eligible for ESG rapid re-housing assistance (including the ESG-CV Housing Choice Voucher Retention & Prevention (HCVRP) Program). See Appendix D for definitions of homelessness.

- **Literally homeless** (HUD Category 1: has a primary nighttime residence not meant for human habitation, is staying in a shelter, or is exiting an institution and resided in a shelter or a place not meant for human habitation immediately prior to entering that institution)
- **Fleeing/attempting to flee DV** (HUD Category 4), as long as the individuals/families fleeing or attempting to flee DV are also literally homeless.

Referrals to the HCVRP Program will be made by HAWC as needed and subsequent to MSHDA HCV pulls from the homeless preference list.

Prioritization

Once the VI-SPDAT assessment is complete and homelessness status is confirmed, households are prioritized for referral to an RRH program using the CHP Committee's Housing Prioritization Criteria. During the pandemic, those at greatest risk of severe illness from COVID-19 will be prioritized for ESG-CV RRH. As appropriate, referrals can be made directly from non-congregate shelter resources to RRH providers. All other ESG RRH referrals will be made by the Community Housing Prioritization (CHP) Committee using the RRH prioritization criteria outlined in the CoC's Coordinated Entry Policies & Procedures.

Eligible Costs

Eligible costs under the RRH program component include housing relocation and stabilization services and short- and/or medium-term rental assistance.

Housing Relocation and Stabilization Services

Households referred to RRH programs may receive supportive services, including housing search & placement and housing stability case management. Program participants must meet with a case manager at least monthly. Eligible activities are described below.

- (1) *Financial assistance costs.* ESG rapid re-housing funds may be used to pay housing owners, utility companies, and other third parties for the following costs:
 - *Rental application fees:* maximum of 3 per household
 - *Security deposits:* equal to no more than 1.5 months' rent
 - *Last month's rent:* if necessary to obtain housing for a program participant, subrecipients may pay a program participant's last month's rent; it cannot exceed the cost of one month's rent and must be paid to the landlord at the time of first month's rent and security deposit.
 - *Utility deposits:* eligible utility services are gas, electric, water, and sewage.
 - *Utility payments:* ESG funds may pay up to 24 months of utility payments per program participant, per service, including up to 6 months of utility payments in arrears, per service; a partial payment of a utility bill counts as one month; this assistance may only be provided if the program participant or a member of the same household has an account in his or her name with a utility company or proof of responsibility to make utility payments; eligible utility services are gas, electric, water, and sewage; no program participant shall receive more than 24 months of utility assistance within any 3-year period.
 - *Moving costs:* ESG funds may pay for moving costs, such as truck rental or hiring a moving company; this assistance may include payment of temporary storage fees for up to 3 months, provided that the fees are accrued after the date the program

participant begins receiving assistance and before the program participant moves into permanent housing; payment of temporary storage fees in arrears is not eligible.

- *Landlord incentives:* ESG funds may be used for landlord incentives as reasonable and necessary to obtain housing for individuals and families; total landlord incentive payments cannot exceed three times the rent charged for the unit. Eligible landlord incentives include:
 - i. Signing bonuses up to \$400.00 (must be a year lease);
 - ii. Paying the cost to repair damages incurred by the program participant not covered by the security deposit, up to \$900.00 for one-bedroom or \$2,000.00 for two bedroom or larger units, and cannot exceed the cost of one month's rent;
 - iii. Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.
- If a program participant receiving short- or medium-term rental assistance meets the conditions for an emergency transfer under VAWA, ESG funds may be used to pay amounts owed for breaking a lease to effect an emergency transfer.

ESG funds cannot be provided to a program participant who is receiving the same type of assistance through other public sources. Assisted units are subject to Lead-Based Paint requirements and Habitability and Occupancy Standards.

(2) *Housing search and placement.* Services or activities necessary to assist program participants in locating, obtaining, and retaining suitable permanent housing:

- Assessment of housing barriers, needs, and preferences
- Development of an action plan for locating housing
- Housing search
- Outreach to and negotiation with owners
- Assistance with submitting rental applications and understanding leases
- Assessment of housing for compliance with Emergency Solutions Grant (ESG) requirements for habitability, lead-based paint, and rent reasonableness
- Assistance with obtaining utilities and making moving arrangements
- Tenant counseling

(3) *Housing stability case management.* Services or activities related to assessing, arranging, coordinating, and monitoring the delivery of individualized services.

Component services and activities consist of:

- Using the centralized or coordinated assessment to evaluate households receiving assistance
- Conducting the initial evaluation, including verifying and documenting eligibility
- Counseling
- Developing, securing, and coordinating services and obtaining Federal, State, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Developing an individualized housing and service plan, including planning a path to permanent housing stability
- Conducting recertifications

- (4) *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.

The total period for which any program participant may receive the services in this section must not exceed 24 months during any 3-year period. The limits on the assistance under this section apply to the total assistance an individual receives, either as an individual or as part of a family (i.e., if household composition changes, limits on assistance do not reset).

Short- and/or Medium-Term Rental Assistance

Households referred to RRH programs may also receive short- and/or medium-term rental assistance. Subrecipients may provide a program participant with up to 24 months of rental assistance during any 3-year period. This assistance may include short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance:

- Short-term rental assistance: assistance for up to 3 months of rent
- Medium-term rental assistance: assistance for more than 3 months but not more than 24 months of rent (no more than **12 months** under ESG-CV Round 2)
- Payment of rental arrears: one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears

Providers will work with households to determine monthly rent contribution, accounting for household income and other factors. All rental assistance payments must be made directly to the landlord. Except for a one-time payment of rental arrears on the tenant's portion of the rental payment, rental assistance cannot be provided to a program participant who is receiving rental assistance through other public sources.

Assisted units are subject to FMR and Rent Reasonableness standards, Lead-Based Paint requirements, and Habitability and Occupancy Standards.

Connecting Program Participants to Mainstream and Other Resources

The recipient and its subrecipients must assist each program participant, as needed, to obtain:

- Appropriate supportive services, including assistance in obtaining permanent housing, medical health treatment, mental health treatment, counseling, supervision, and other services essential for achieving independent living; and
- Other Federal, State, local, and private assistance available to assist the program participant in obtaining housing stability, including: Medicaid, Supplemental Nutrition Assistance Program, Women, Infants and Children (WIC), Federal-State Unemployment Insurance Program, Social Security Disability Insurance (SSDI), Supplemental Security Income (SSI), Child and Adult Care Food Program, Section 9 Public Housing programs, Section 8 Public Housing programs, Supportive Housing for Persons with Disabilities, HOME Investment Partnerships Program, Temporary Assistance for Needy Families, Health Center Program, State Children's Health

Insurance Program, Head Start, Mental Health and Substance Abuse Block Grants, and services funded under the Workforce Investment Act.

HMIS

Subrecipients may use ESG and ESG-CV funds to pay the costs of contributing data to the HMIS designated by the Washtenaw County Continuum of Care, including the costs of:

- Purchasing or leasing computer hardware
- Purchasing software or software licenses
- Purchasing or leasing equipment, including telephones, fax machines, and furniture
- Obtaining technical support
- Leasing office space
- Paying charges for electricity, gas, water, phone service, and high-speed data transmission necessary to operate or contribute data to the HMIS
- Paying salaries for operating HMIS, including:
 - Completing data entry
 - Monitoring and reviewing data quality
 - Completing data analysis
 - Reporting to the HMIS Lead
 - Training staff on using the HMIS or comparable database
 - Implementing and complying with HMIS requirements
- Paying costs of staff to travel to and attend HUD-sponsored and HUD-approved training on HMIS and programs authorized by Title IV of the McKinney-Vento Homeless Assistance Act
- Paying staff travel costs to conduct intake
- Paying participation fees charged by the HMIS Lead

ESG-CV funds may also be used to support the following HMIS costs:

- Hosting and maintaining HMIS software or data
- Backing up, recovering, or repairing HMIS software or data
- Upgrading, customizing, and enhancing the HMIS
- Integrating and warehousing data, including development of a data warehouse for use in aggregating data from subrecipients using multiple software systems
- Administering the system
- Reporting to providers, the Continuum of Care, and HUD
- Conducting training on using the system or a comparable database, including traveling to the training.

If the subrecipient is a victim services provider or a legal services provider, it may use ESG funds to establish and operate 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.

Activities funded under this section must comply with HUD's standards on participation, data collection, and reporting under a local HMIS.

Administration

The subrecipient may use a certain percentage, as determined by OCED, of its ESG-CV grant for the payment of administrative activities linked directly to the grant, including general management to oversee staff, accounting or clerical support staff, and office operations. This does not include staff and overhead costs directly related to carrying out activities eligible under any of the program components listed above, because those costs are eligible as part of those activities. Eligible administrative costs include:

- (1) *General management, oversight and coordination.* Costs of overall program management, coordination, monitoring, and evaluation. These costs include, but are not limited to, necessary expenditures for the following:
 - Salaries, wages, and related costs of staff engaged in program administration. Program administration assignments include the following:
 - Preparing program budgets and schedules, and amendments to those budgets and schedules;
 - Developing systems for assuring compliance with program requirements;
 - Monitoring program activities for progress and compliance with program requirements;
 - Preparing reports and other documents directly related to the program for submission to OCED;
 - Coordinating the resolution of audit and monitoring findings;
 - Evaluating program results against stated objectives; and
 - Managing or supervising persons whose primary responsibilities with regard to the program include such assignments as those described in this section.
 - Other costs for goods and services required for administration of the program, including rental or purchase of equipment, insurance, utilities, office supplies, and rental and maintenance (but not purchase) of office space.
- (2) *Training on ESG requirements.* Costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings.

Other ESG Program Requirements

Fair Market Rent (FMR) and Rent Reasonableness

Rental assistance cannot be provided unless the unit meets both Fair Market Rent (FMR) for the area and rent reasonableness standards. **If using ESG-CV funds, assistance may be provided for units up to 110% FMR, so long as there is no unit meeting FMR available and the unit identified still meets rent reasonableness.** Total rent equals the sum of the total monthly rent for the unit, any fees required for occupancy under the lease (other than late fees and pet fees) and, if the tenant pays separately for utilities, the monthly allowance for utilities.

To determine if a unit meets FMR and Rent Reasonableness standards, subrecipients must:

1. Calculate the utility allowance for tenants paying their own rent using [MSHDA's Utility Allowance Schedule for Region D](#). (Utility costs may include gas, electric, water, sewer, and trash. Telephone, cable or satellite television service and internet service are not included in FMRs and are not allowable costs under ESG.) Add the contract rent and utilities together to determine the gross rent. Contract Rent + Utilities = Gross Rent. The gross rent must not exceed FMR (or **110% FMR for ESG-CV**) for the unit to be eligible. If the gross rent does not exceed this threshold, then:
2. Complete the Rent Reasonableness analysis. The rents shown as comparable must be equal to or less than the gross rent of the proposed rental. If the gross rent does not exceed the rent reasonableness standard, then ESG funds may be used for the unit.

If the gross rent for the unit exceeds either the rent reasonableness or FMR standards, ESG funds cannot be used to pay any portion of the rent, even if the household is willing and/or able to pay the difference. If the reasonable rent for a specific unit is lower than the FMR, then the rent for the unit assisted with ESG funds must not exceed the lesser of the FMR or the rent reasonableness standard.

Rental Assistance Agreement & Lease

Each program participant receiving rental assistance must have a legally binding, written lease for the rental unit. If rental arrearages are paid, the participant must have had a valid lease in place covering the arrearage period. The rental arrearage paid each month cannot exceed the FMR limit or rent reasonableness standards.

In addition, a Rental Assistance Agreement is required prior to making any rental assistance payments. Subrecipients must use MSHDA's Rental Assistance Agreement to meet this requirement. Subrecipients must make timely payments to landlords in accordance with the rental assistance agreement; subrecipients are solely responsible for any late payment penalties it incurs, and may not use ESG funds to cover late fees.

Lead-Based Paint, Habitability, & Occupancy Standards

Lead-Based Paint Inspection is required for properties built before 1978 and if a child age 6 or younger or a pregnant woman will be residing in the unit. The inspection may be visual; however, if the child age 6 or younger has been identified with an Identified Environmental Intervention Blood Lead Level, the inspection must be done by a Certified Lead-Based Paint Risk Assessor.

In addition, **all units must meet HUD's Habitability Standards for ESG funds to be used to assist households to remain in or move into the unit.** This is determined through a Habitability Standards Inspection, which may be completed by ESG staff. For individuals moving into a new unit, the unit must meet Habitability Standards before a lease is signed and the household moves into the unit. If water/utilities are not on at the time of initial inspection, a follow-up inspection must be done within 10 days of the water/utilities being turned on. See Appendix C for detailed information on habitability standards.

All assisted units must also comply with MSHDA's Occupancy Standards, as outlined in Appendix C.

Indirect Costs

ESG grant funds may be used to pay indirect costs in accordance with 2 CFR part 200, subpart E. Indirect costs may be allocated to each eligible activity under all program components, so long as that allocation is consistent with 2 CFR part 200, subpart E.

Appendix A: Required Forms for ESG Assistance

ESG required forms are described below. Subrecipients must complete the forms listed for the applicable program component, as stated in the forms table. All forms can be accessed on the Michigan State Housing Development Authority's [ESG Website](#). Documentation must be retained for 5 years after the expenditure of all funds from the grant under which the program participant was served.

HMIS Release of Information (ROI): ROI form must be signed by each household member age 18 or older with a copy on file.

Housing Plan: must be completed for all individuals and families that are determined eligible for ESG services, including households receiving case management and/or financial assistance; if a household is determined ineligible, a housing plan is not necessary.

Homelessness Certifications

Rapid Re-Housing Certification: certifies HUD Category 1 (Literal Homelessness) status and must be accompanied by appropriate documentation; required if receiving RRH financial assistance and/or case management.

Homelessness Prevention Certification: required if receiving homelessness prevention financial assistance and/or case management; certifies eligibility for Homelessness Prevention assistance, including:

- Household meets income threshold criteria
- Household lacks sufficient resources/support networks; and
- Household meets HUD Category 2 (At Imminent Risk), Category 4 (Fleeing Domestic Violence), OR At Risk of Homelessness Status
- Must be accompanied by appropriate documentation.

Homelessness Self-Certification: allows individuals to self-certify their homelessness status when unable to provide required verifications and other documents.

Income Verifications & Eligibility

Verification of Income: verifies income documentation received or allows self-certification where documentation is not obtainable (including zero income); must be completed for each member of the household age 18 and older.

Third Party Verification of Income: certifies income; must be completed for each member of the household age 18 and older with income and third-party verification.

Income Eligibility Worksheet: must be completed for all members of the household age 18 and older with income.

Unit & Landlord Documents

Rent Reasonableness Analysis: must be completed for all assisted units; subrecipients must provide 3 rent comparables.

Rental Assistance Agreement with Lease Addendum: must be completed for all units receiving homelessness prevention and/or rapid re-housing rental assistance.

Request for Taxpayer ID (W-9): landlords receiving rent payments must provide their Taxpayer Identification Number using the W-9.

Inspections

Notice of Inspection: units must be inspected before homelessness prevention and/or rapid re-housing rental assistance can be provided; landlords and tenants must be notified of the date and time of the inspection, and the tenant or the landlord or an adult representative must be present at the housing unit during the inspection.

Habitability Standards Inspection Checklist: must be completed prior to providing homelessness prevention and/or rapid re-housing rental assistance; can be completed by ESG program staff.

Inspection Deficiencies Notice: required if Habitability Standards Inspection reveals deficiencies and reinspection is required.

Delayed Exterior Repair Agreement: may be used if inspections reveal exterior deficiencies that cannot be repaired due to inclement weather.

Lead-Based Paint

Disclosure of Information on Lead-Based Paint and its Hazards: must be completed if the assisted housing unit was built prior to 1978.

Lead-Based Paint Property Owner Certification: may be used for property owners/landlords to certify that all paint stabilization activities have been completed.

Participant Acknowledgment

Notice of Occupancy Rights under the Violence Against Women Act: must be completed by all ESG homelessness prevention and rapid re-housing recipients at the time of assistance is provided or project admission; it must also be provided to applicants denied assistance, evicted, or terminated from the project; must also be provided to property owners and managers.

Protect Your Family From Lead in Your Home: must be completed by all ESG homelessness prevention and rapid re-housing recipients at the time of assistance is provided or project admission; it must also be provided to applicants denied assistance, evicted, or terminated from the project.

ESG Required Forms by Program Component

| Form | Emergency Shelter Essential Services | Homelessness Prevention | Rapid Re-Housing |
|---|--------------------------------------|--|--|
| HMIS ROI | ✓ | ✓ | ✓ |
| Housing Plan | ✓ | ✓ | ✓ |
| Rapid Re-Housing Certification | | | ✓ |
| Homelessness Prevention Certification | | ✓ | |
| Homelessness Self-Certification | | As needed | As needed |
| Verification of Income | | ✓ | ✓ |
| Third Party Verification of Income | | ✓ | ✓ |
| Income Eligibility Worksheet | | ✓ | ✓ |
| Rent Reasonableness Analysis | | ✓ (if providing rental assistance) | ✓ (if providing rental assistance) |
| Rental Assistance Agreement | | ✓ (if providing rental assistance) | ✓ (if providing rental assistance) |
| Request for Tax Payer ID | | ✓ (if a landlord is receiving payments) | ✓ (if a landlord is receiving payments) |
| Notice of Inspection | | ✓ (required for all assisted units) | ✓ (required for all assisted units) |
| Habitability Standards Inspection Checklist | | ✓ (required for all assisted units) | ✓ (required for all assisted units) |
| Inspection Deficiencies Notice | | As needed | As needed |
| Delayed Exterior Repair Agreement | | As needed | As needed |
| Disclosure of LBP & Hazards | | Required if unit was built before 1978 | Required if unit was built before 1978 |
| LBP Property Owner Certification | | As needed | As needed |
| Notice of Rights Under VAWA | | ✓ | ✓ |
| Protect Your Family from Lead | | ✓ | ✓ |

Appendix B: Standards for Emergency Shelter

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program.

In addition, any building for which ESG funds are used for conversion, major rehabilitation, or other renovation, must meet state or local government safety and sanitation standards, as applicable, and the following minimum safety, sanitation, and privacy standards. Any emergency shelter that receives assistance for shelter operations must also meet the following minimum safety, sanitation, and privacy standards.

- (1) *Structure and materials.* The shelter building must be structurally sound to protect residents from the elements and not pose any threat to health and safety of the residents. Any renovation (including major rehabilitation and conversion) carried out with ESG assistance must use Energy Star and WaterSense products and appliances.
- (2) *Access.* The shelter must be accessible in accordance with Section 504 of the Rehabilitation Act (29 U.S.C. 794) and implementing regulations at 24 CFR part 8; the Fair Housing Act (42 U.S.C. 3601 *et seq.*) and implementing regulations at 24 CFR part 100; and Title II of the Americans with Disabilities Act (42 U.S.C. 12131 *et seq.*) and 28 CFR part 35; where applicable.
- (3) *Space and security.* Except where the shelter is intended for day use only, the shelter must provide each program participant in the shelter with an acceptable place to sleep and adequate space and security for themselves and their belongings.
- (4) *Interior air quality.* Each room or space within the shelter must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- (5) *Water supply.* The shelter's water supply must be free of contamination.
- (6) *Sanitary facilities.* Each program participant in the shelter must have access to sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- (7) *Thermal environment.* The shelter must have any necessary heating/cooling facilities in proper operating condition.
- (8) *Illumination and electricity.* The shelter must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the shelter.
- (9) *Food preparation.* Food preparation areas, if any, must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- (10) *Sanitary conditions.* The shelter must be maintained in a sanitary condition.
- (11) *Fire safety.* There must be at least one working smoke detector in each occupied unit of the shelter. Where possible, smoke detectors must be located near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas of the shelter must have at least one working smoke detector. There must also be a second means of exiting the building in the event of fire or other emergency.

Appendix C: Standards for Permanent Housing

Occupancy Standards

Occupancy standards are used to provide consistent criteria for determining the unit size for which the household is eligible and thus, the amount of assistance to be provided. The following basic standards can be modified to take into consideration specific household composition and circumstances (i.e., pending child custody cases, chronic illnesses, family member who is absent most of the time).

- No more than two persons are required to occupy a bedroom;
- Persons of different generations (i.e., grandparents, parents, children), persons of the opposite sex (other than spouses/couples) and unrelated adults are not required to share a bedroom;
- Children of the same sex (regardless of age) and couples co-habiting (whether legally married) must share the same bedroom for purpose of assigning the number of bedrooms;
- A live-in care attendant who is not a member of the family is not required to share a bedroom with another household member;
- Individual medical problems (i.e., chronic illness) sometimes require either separate bedrooms for household members who would otherwise be required to share a bedroom or an extra bedroom to store medical equipment;
- In most instances, a bedroom is not provided for a family member who will be absent most of the time, such as a member who is away in the military.

Fair housing rules permit a household to select smaller units that do not create seriously overcrowded conditions.

- **Undersized Units:** If a family elects to occupy a unit with fewer bedrooms than specified in the Occupancy Guidelines, the FMR is based on the actual number of bedrooms;
- **Oversized Units:** If a family elects to occupy a unit with more bedrooms than specified in the Occupancy Guidelines, the FMR is based on the number of bedrooms specified in the Occupancy Guidelines; i.e., a tenant may select a larger unit if it meets the FMR for the actual number of bedrooms for which they are eligible according to the eligibility guidelines. Tenants are not allowed to give the landlord additional funds for larger units.

If an additional bedroom is required for an individual who would normally be required to share a room, the reason must be documented in the file. For example: If an additional room is needed because of a medical condition, documentation may be a note from their doctor; otherwise, if the case manager determines an additional room is needed (medical condition, care-giver, medical equipment etc.) the case manager must document the reason in the case management notes. In cases where college students and children staying only for weekends etc., the amount of time spent in the unit should be taken into consideration before assigning additional bedroom(s).

ESG assistance is short-term and a smaller unit is acceptable if it does not create serious overcrowding; a living room can be counted as a sleeping room. If student/children will be in

the unit most of the time and future rent will not be a burden, then an additional bedroom can be assigned.

Lead-Based Paint & Habitability Standards

The Lead-Based Paint Poisoning Prevention Act (42 U.S.C. 4821-4846), the Residential Lead-Based Paint Hazard Reduction Act of 1992 (42 U.S.C. 4851-4856), and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M, and R apply to all shelters assisted under ESG program and all housing occupied by program participants.

The recipient or subrecipient cannot use ESG funds to help a program participant remain or move into housing that does not meet the minimum habitability standards below.

- (1) *Structure and materials.* The structures must be structurally sound to protect residents from the elements and not pose any threat to the health and safety of the residents.
- (2) *Space and security.* Each resident must be provided adequate space and security for themselves and their belongings. Each resident must be provided an acceptable place to sleep.
- (3) *Interior air quality.* Each room or space must have a natural or mechanical means of ventilation. The interior air must be free of pollutants at a level that might threaten or harm the health of residents.
- (4) *Water supply.* The water supply must be free from contamination.
- (5) *Sanitary facilities.* Residents must have access to sufficient sanitary facilities that are in proper operating condition, are private, and are adequate for personal cleanliness and the disposal of human waste.
- (6) *Thermal environment.* The housing must have any necessary heating/cooling facilities in proper operating condition.
- (7) *Illumination and electricity.* The structure must have adequate natural or artificial illumination to permit normal indoor activities and support health and safety. There must be sufficient electrical sources to permit the safe use of electrical appliances in the structure.
- (8) *Food preparation.* All food preparation areas must contain suitable space and equipment to store, prepare, and serve food in a safe and sanitary manner.
- (9) *Sanitary conditions.* The housing must be maintained in a sanitary condition.
- (10) *Fire safety.*
 - i. There must be a second means of exiting the building in the event of fire or other emergency.
 - ii. 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.
 - iii. 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, community rooms, day care centers, hallways, stairwells, and other common areas.

Special Unit Types

Single Room Occupancy

Single room occupancy (SRO) unit provides living and sleeping space for the exclusive use of the occupant but requires the occupant to share sanitary and/or food preparation facilities with others. No more than one person may occupy an SRO unit. Assistance may be provided using SRO FMR + utilities. If a subrecipient provides ESG assistance in an SRO unit, there must be a lease in place, and additional habitability standards apply:

- Access: Access doors to the SRO unit must have working locks for privacy. The occupant must be able to access the unit without going through any other unit. Each unit must have immediate access to two or more approved means of exit from the building, appropriately marked and leading to safe and open space at ground level. The SRO unit must also have other means of exit required by State or local law.
- Fire Safety: All SRO facilities must have a sprinkler system that protects major spaces. Major spaces are defined as hallways, common areas, and any other areas specified in local fire, building or safety codes. SROs must also have hard-wired smoke detectors, and any other fire and safety requirement required by state or local law.
- Sanitary facilities and space and security standards must meet local code requirements for SRO housing. In the absence of local code standards, the requirements discussed below apply [24 CFR 982.605]:
 - Sanitary Facilities: At least one flush toilet that can be used in privacy, a lavatory basin and a bathtub or shower in proper operating condition must be provided for each six persons (or fewer) residing in the SRO facility. If the SRO units are leased only to men, flush urinals may be substituted for up to one half of the required number of toilets. Sanitary facilities must be reasonably accessible from a common hall or passageway and may not be located more than one floor above or below the SRO unit. They may not be located below grade unless the SRO units are located on that level.
 - Space and Security: An SRO unit must contain at least 110 square feet of floor space, and at least 4 square feet of closet space with an unobstructed height of at least five feet for use by the occupant. If the closet space is less than four square feet, the habitable floor space in the SRO unit must be increased by the amount of the deficiency. Exterior doors and windows accessible from outside the SRO must be lockable.

All other ESG eligibility requirements apply.

Efficiency or Studio Units

An efficiency or studio unit is a small apartment unit which combines living room, bedroom, and kitchenette into a single room. Efficiency apartments are sometimes smaller than studio apartments. ESG assistance may be provided based on 0-bedroom size at Fair Market Rent + utilities. All other ESG eligibility requirements apply.

Mobile Home, Trailers, and Manufactured Housing

Mobile Home or Trailers are a structure that is transportable in one piece and can be moved from one place to another. The term 'mobile home' or 'trailer' is often used interchangeably.

A manufactured home is a manufactured structure transportable in one or more parts that is built on a permanent chassis and designed for use as a principal place of residence.

ESG funds may assist with these recognized housing units if they are securely attached to a stationary pad (i.e. tied down). The pad may be either a poured basement, concrete slab on grade or, must be securely anchored to the site; the unit may or may not have a 'tongue' removed; the unit may or may not be 'skirted'. ESG will not pay for any unit that can be attached to a vehicle and readily moved from location-to-location. ESG will not pay for units that are intended for recreational purposes such as campers or tents.

Housing Case Managers shall use discretion when committing ESG funds for the use of these units and documentation must be in the file. A lease must be in place, and the following guidelines apply:

- ESG assistance may be made for the unit size FMR amount and may include the lot rent if it is written in the lease as such.
- FMR amount + lot rent amount should NOT be added together to obtain FMR. It is one or the other, not both. (Utilities would also need to be considered as part of the FMR)
- Persons receiving ESG assistance may not pay the 'difference' to 'qualify' under FMR amounts.
- ESG may assist those who own units but cannot afford to pay lot rent.
- Rent Reasonableness is based on comparable units taking into consideration location and size of unit.
- Units may be in a community setting or on private property.
- Additional Habitability Standards do apply:
 - Security: A mobile home or trailer must be placed on the site in a stable manner and must be free from hazards such as sliding or wind damage. The home must be securely anchored by a tie-down device that distributes and transfers the loads imposed by the unit to appropriate ground anchors to resist overturning and sliding.

All other ESG eligibility requirements apply.

Appendix D: Categories & Definitions of Homelessness

The U.S. Department of Housing and Urban Development (HUD) defines four categories of homelessness and three categories of at risk of homelessness.

HUD's Categories of Homelessness¹

| | | |
|-----------------------|--------------------------------------|---|
| <p>Category 1</p> | <p>Literally Homeless</p> | <ul style="list-style-type: none"> • 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); or (iii) 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 |
| <p>Category 2</p> | <p>Imminent Risk of Homelessness</p> | <ul style="list-style-type: none"> • 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; and |

¹https://files.hudexchange.info/resources/documents/HomelessDefinition_RecordkeepingRequirementsandCriteria.pdf

| | | |
|------------|--|---|
| | | (iii) The individual or family lacks the resources or support networks needed to obtain other permanent housing |
| Category 3 | Homeless under other Federal Statutes | <ul style="list-style-type: none"> • 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; and (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 Domestic Violence | <ul style="list-style-type: none"> • 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; and (iii) Lacks the resources or support networks to obtain other permanent housing |

At Risk of Homelessness²

| | | |
|------------|------------------------|---|
| Category 1 | Individuals & Families | An individual or family who: <ul style="list-style-type: none"> (i) Has an annual income below 30% of median family income for the area; AND |
|------------|------------------------|---|

² https://files.hudexchange.info/resources/documents/AtRiskofHomelessnessDefinition_Criteria.pdf

| | | |
|-----------------------|---|--|
| | | <ul style="list-style-type: none"> (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: <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; OR (B) Is living in the home of another because of economic hardship; OR (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; OR (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; OR (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; OR (F) Is exiting a publicly funded institution or system of care; OR (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 |
| <p>Category 2</p> | <p>Unaccompanied Children & Youth</p> | <p>A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute</p> |

| | | |
|---------------|--------------------------------------|---|
| Category 3 | Families with Children & 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. |
|---------------|--------------------------------------|---|

Appendix E: Other Definitions

Continuum of Care (CoC) – A collaborative planning body designed to address homelessness through a coordinated community-based process of identifying needs and building a system of housing and services to address those needs. It is the body responsible for meeting the goals of HUD’s Continuum of Care Program.

Covid-19 At-Risk Screening Tool – used to assess all literally homeless clients for underlying conditions that may put them at greater risk for severe illness from COVID-19, in accordance with the Centers for Disease Control & Prevention and the Washtenaw County Department of Health.

Emergency Shelter (ES) – A facility with overnight sleeping accommodations, the primary purpose of which is to provide temporary shelter for persons experiencing homelessness.

Emergency Solutions Grant (ESG) – created by the Homeless Emergency Assistance and Rapid Transition to Housing Act (HEARTH Act) in 2009, the ESG program provides formula grants to cities, counties, territories, and states to assist those experiencing a housing or homelessness crisis to regain housing stability.

ESG-CV – supplemental ESG funding authorized under the Coronavirus Aid, Relief, and Economic Security (CARES) Act.

Homeless Management Information System (HMIS) – A computerized data collection system that tracks services received by homeless people, helps identify gaps in services within the continuum, and allows for greater collaboration among service providers as the system provides a “history” of a homeless person’s involvement in the system of care making it easier for caseworkers to evaluate the situation and provide services in the most efficient manner. In addition, the HMIS system can help accurately describe a community’s homeless population including unduplicated census counts, need for increased capacity to fill service gaps. This system is required by HUD for all continuums of care.

Homelessness Prevention – Housing relocation and stabilization services and short-and/or medium- term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in HUD Category 1.

HUD – short for the U.S. Department of Housing and Urban Development, the federal agency that oversees, regulates, and administers the ESG program nationwide.

MSHDA – short for the Michigan State Housing Development Authority, the state agency that oversees, regulates, and administers Michigan’s statewide allocation of ESG funds; Washtenaw County is a subrecipient of MSHDA ESG funds.

OCED – short for the Washtenaw County Office of Community and Economic Development, the local agency serving as fiduciary on both federal and state ESG funds; OCED is responsible for administering, monitoring, and overseeing ESG funds locally.

Prioritization – Common, community-wide standards that determine who programs serve next from among multiple potential referrals with different vulnerabilities and needs

Program Participant – an individual or family who is assisted under ESG program, also often referred to as household.

Rapid Re-Housing (RRH) – An intervention that rapidly connects families and individuals experiencing homelessness (HUD Category 1 or Category 4) to permanent housing through housing identification, rent and move-in assistance, and case management and services.

Subrecipient – a unit of general purpose local government or private nonprofit organization to which a recipient makes available ESG funds.

Transitional Housing (TH) – Supportive housing used to facilitate the movement of individuals and families experiencing homelessness to permanent housing within 24 months.

Vulnerability – a combination of variables that indicate an individual or family is at a higher risk of death or harm due to continued homelessness.

- o VI-SPDAT: a standardized, shared housing assessment called the Vulnerability Index & Service Prioritization Decision Assistance Tool (VI-SPDAT) designed to identify a household's service needs as well as potential program eligibility.

- o Family VI-SPDAT: a version of the VI-SPDAT specialized for families with minor children.

- o TAY VI-SPDAT: "Transition Aged Youth Vulnerability Index & Service Prioritization Decision Assistance Tool" a version of the VI-SPDAT specialized for unaccompanied youth