

Written Standards Checklist

Emergency Solutions Grant COVID 19 – ESG-CV

All subrecipients who receive ESG-CV funds are required to establish and consistently apply Written Standards for providing assistance (see 24 CFR 576.400(e) of the ESG Interim Rule). Grantees are encouraged to prioritize time to <u>create/review their Written Standards</u> to clarify how resources will be used in response to Coronavirus. The Department of Commerce has provided general guidelines but offers flexibility in how subrecipients address the definitions of preventing, preparing and responding to COVID-19 as it relates to ESG-CV funds. For example, if a subrecipient plans to budget landlord incentives with ESG-CV funds, the subrecipient must identify the appropriate documentation to accompany those incentives. Additional information regarding ESG subrecipient requirements are found in the <u>CPD HUD Monitoring Handbook</u>. Reference Chapter 28 for ESG Program requirements, Chapter 34 for finance requirements, and Chapter 24 for Lead-Based Paint Compliance.

Below are guidelines that outline the ESG Written Standards requirements, the policies and procedures that subrecipients should include in their updated Written Standards, and sample language to adopt if desired. Written standards must align with <u>Housing First principles</u> and should be grounded in <u>equity-based principles</u>.

Requirement	Important Components and Sample Language	Completed
Description of the area of service where assistance is		
offered.		
Description of projects funded with ESG-CV and how they prevent, prepare for, and respond to the coronavirus.	 How does each project (e.g., RRH, HP, Emergency Shelter, HMIS) address COVID for the identified population? Programs do not use health status to discriminate access to programs Sample language: The agency will ensure that mitigation practices are effectively implemented by collaborating with public health officials in disseminating information and resources to those experiencing homelessness. 	

Overall Program Administration

	 Whenever possible, the agency will move COVID affected clients to locations where they are not at risk of spreading the infection further. A critical component to infectious disease prevention is ensuring that shelters and housing programs have the necessary supplies in stock to maintain a disease-free environment. The agency takes full responsibility to ensure that all programs can identify and obtain needed supplies. Training is provided to all staff on how to prevent, prepare and respond to COVID. Projects funded with ESG-CV coordinate care for individuals who are sick and experiencing homelessness. This includes activities such as arranging transportation for individuals who are sick and/or securing an appropriate, safe location where people can stay during the illness. During quarantine, clients are provided with essentials: food, laundry, clothing, and prescriptions (as needed) as well as case management to determine and direct clients to needed services. Established relationships and referral processes with local agencies help us to provide quick access to needed care for those experiencing homelessness. 	
Describe how agency prevents duplication of benefits.	 Duplication of benefits occurs when an individual or household receives financial assistance for the same service, during the same time period, from multiple funding sources. All subrecipients must establish and maintain adequate procedures to prevent any duplication of benefits with ESG-CV funds. Determine and document if the household is receiving assistance from other sources (e.g., philanthropy, FEMA costs for temporary shelter, ERAP, CDBG-CV, State Consolidated Housing Grant, etc.) to avoid <u>duplication of benefits</u> and/or disqualification of the household from assistance. Reference any checklists, forms, or tools you use to evaluate if the household is receiving assistance from other sources Ensure that an evaluation of a program participant's benefits is conducted during re-evaluation. 	

	Sample language: Additional sources of financial assistance and services provided to a household must be documented, and a determination must be made that there is no duplication of benefits.	
Prioritization policy that defines how program participants will be evaluated for eligibility and assistance. (DV projects must follow the Violence Against Women Act (VAWA) and the Family Violence Prevention and Services Act).	 During COVID, grantees may consider changing assessment or prioritization to include COVID vulnerabilities such as age, specific health conditions, and/or medical frailty. Prioritization policy must be aligned with CDC recommendations for people at risk of severe illness if contracted COVID-19. Policy should also be aligned with <u>Washington State</u> <u>Coordinated Entry Requirements</u> and local Coordinated Entry System policies, which may have modified/expedited the assessment, scoring and eligibility determination to prioritize those at high risk for severe illness from COVID-19. Review HUD <u>Coordinated Entry requirements</u> to ensure they are low-barrier, which may include allowing people to be prioritized with zero/low income, disabilities, and long-term histories of experiencing homelessness. 	
	 Sample language: In collaboration with the local Healthcare for the Homeless, the jurisdiction has streamlined and updated the Coordinated Entry System Assessment to include COVID-19 vulnerabilities outlined in the state protective health order which established non-congregate shelters for people experiencing homelessness. This assessment will be used for housing placement during the pandemic. 	
Description of coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing	If a subrecipient has set COVID-19 standards for how major parts of the homeless crisis response system coordinate, they should be documented in the Written Standards.	

providers, other homeless assistance providers, and mainstream service and housing providers (see § 576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent possible.	 Areas of coordination under ESG-CV may be new and different from regular ESG, and other homeless housing funding, and may involve a role that public health partners play in service delivery and access to medical care. Sample language: The local department of public health is available to conduct testing for people experiencing homelessness at "x" shelters or at "y" locations. ESG-CV funded shelters and outreach programs encourages (but does not require) people experiencing homeless to get tested if they are experiencing COVID symptoms. "x" shelter funded under ESG-CV maintains social distancing requirements established in partnership with the Department of Public Health 	
Description of formal termination process that recognizes the rights of individuals affected.	 Subrecipients must develop a formal termination process. All program participants must be informed of this process when they enter the program, along with examples of the types of things that will cause them to be terminated from the program. The subrecipient must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant's assistance is terminated only in the most severe cases. (24 CFR 576.402) Sample language: In general, if a program violation occurs and the program terminates assistance as a result, the termination will follow an established process that recognizes the rights of the individuals affected. Termination shall only occur in the most severe cases after other remedies have been attempted. Termination of individuals and families in projects funded through the ESG 	

	program must be consistent with 576.402 for those projects funded through the ESG program.	
Description of the formal grievance process.	Subrecipient must develop an established process for addressing program participant grievances. The program participant must be informed of the grievance and appeal procedures upon intake into a program. All established processes must include the right of the participant to contact the agency director, the Department of Commerce, or HUD.	
	 Sample language: Program participants may contest and appeal any decision that denies (for any reason), limits eligibility of participant or terminates or modifies levels of assistance. The grievance process is communicated to each program participant at program entry, and a copy of the procedures are provided for their reference. A signed acknowledgement of the grievance and appeal process is included in each client file. 	
	 All program participants have due process rights if facing program termination. When terminating assistance to an ESG-CV program participant receiving rental assistance or housing relocation and stabilization services, the process at a minimum consists of: Written notice clearly stating the reasons for termination Review of the decision that gives the participant opportunity to present objections to the decision and to have representation. Any appeal of a decision shall be heard by an individual different from and not subordinate to the initial decision-maker; and Prompt written notice of the final decision on the appeal 	

	 Ability to provide further assistance: termination will not bar the provider from providing additional assistance to the same family or individual in the future. 	
Summary of HMIS policies and procedures.	Include the requirement that all ESG-CV funded projects will be entered into HMIS, the timeframe for data to be entered, and how the process ensures confidentiality.Include requirement that all participants are provided applicable HMIS releases and client compliant process.Sample language: Lead/subgrantees providing direct service must enter client data into the Homeless Management information System (HMIS) for all ESG-CV funded projects in accordance with the most current HIMIS Data Standards and the ESG Program HMIS Manual.Client data should be entered into HMIS as close to the date of collection as possible. Entering data as soon as possible supports data quality by avoiding backlogs of pending data and allowing near 	
If applicable, description of policies governing hazard pay	 Description of staff receiving hazard pay and how their work is directly related to carrying out ESG-CV eligible costs Ensure hazard pay is reflective of established written compensation policies Demonstrate that the hazard pay is equitably allocated to all related activities Documentation that the hazard pay is reasonable Documentation indicates temporary pay increases that correspond with a period in which the staff person works directly to prevent, prepare for and respond to COVID. Sample language: 	

	Hazard pay is equitably provided in the form of a lump sum bonus payment of \$250 per pay period to all employees who come into direct, regular, contact with individuals experiencing homelessness, and employees who provide core operations support for congregate living programs (security, kitchen staff, etc.). The date of the increase began on September 1 st , 2020 and will cease when the locally certified public health official ends the state of emergency.	
If applicable, description of policies governing volunteer incentives	 Define the term "volunteer" and who qualifies to receive volunteer incentives (e.g., those that provide necessary services during COVID) Type and amount of incentive provided (e.g., gift card/cash) Documentation of rationale to prove that the amount/type of incentive provided is reasonable and appropriate Sample language: A volunteer is defined as a person, including people with past or current lived experience of homelessness who provides services or peer support to help the agency prepare, respond, and recover from COVID. Each volunteer shall receive a gift card stipend in the amount of \$10 for every hour worked. Financial stipends are calculated using sign-in sheets that volunteers sign into and each volunteer signs a sheet acknowledge time worked/amount of stipend received. 	
Standards for documenting homeless status	 Subrecipients must document a program participant's homeless status at intake, the first time they use ESG funded services, and should follow HUD's stated preferred order for documentation. (24 CFR 576.500(b) Sample language: Determination and verification of housing status is required at intake. Order of priority for obtaining verification of housing status is: 	

 Third party documentation including written and source documentation, and HMIS records; Intake worker observations; Certification from households seeking assistance.
 Lack of third party documentation must not prevent a household from receiving services

Street Outreach

Requirement	Important Components and Sample Language	Completed
Standards for targeting and providing essential services related to street outreach.	Include how street outreach is used to prevent, prepare for, and/or respond to COVID-19.	
	 If local standards/activities for providing street outreach have been updated or modified to prevent, prepare or respond to COVID, document these changes. Changes to standards, activities include: Distribution of masks or other PPE, if available, to people who are unsheltered. Provision of handwashing stations and portable bathrooms Maintaining social distancing requirements during engagement Ensure written standards are consistent with CDC guidance related to street outreach and engaging people at increased risk of severe 	
	illness when contracting COVID-19, as well as established best practices.	
	Sample language:	
	• All outreach staff are trained on how to protect themselves from COVID-19. Physical barriers such as a sneeze guard or a large table are used to protect staff who have interactions with persons with unknown infection status.	
	• Outreach staff greet clients from a distance of 6 feet and explain that you are taking additional precautions to protect yourself	

and the client from COVID-19.	
 Provide masks to clients who do not have one or are not wearing one. 	
 Screen clients for symptoms by asking them if they feel as if they have a fever, cough, or other symptoms consistent with COVID- 19. 	
 Provide educational materials about COVID-19 for non-English speakers, those with low literacy or intellectual disabilities, and people who are hearing or vision impaired. 	
 Identify and address potential language, cultural, and disability barriers associated with communicating COVID-19 information to workers, volunteers, and those you serve. 	

Emergency Shelter and Temporary Emergency Shelter (TES)

Requirement	Important Components and Sample Language	Completed
If applicable, describe how Temporary Emergency	Documentation of need for TES consists of a general description	
Shelter (TES) prevents, prepares for, and/or	of the type of temporary shelter proposed with written approval	
responds to coronavirus.	from a public health official (not a public health emergency	
ESG-CV allows for a variety of spaces to be used as	proclamation) that this temporary emergency shelter is needed for the community's COVID response.	
temporary shelters. If the sub-recipient funds a	 Describe how TES is used and its term of operation 	
new and different kind of shelter, that should be	 Demonstrate that the TES's operation is reasonable in cost 	
explained.	compared to other alternatives	
	Sample language:	
	• In "x" community, existing shelter is not available to implement	
	safety protocols, so hotel/motel rooms were identified to allow	
	people to have shelter while staying as healthy as possible. Room	
	rates were negotiated with the owner and are reasonable in cost	
	as compared to other hotels/motels in area. Other TES options	

	 such as churches, offices and public spaces were explored but are not available. Persons may be referred to a hotel/motel if: a) they have been exposed to COVID-19 and do not have a safe place to quarantine; b) have tested positive or are awaiting test results; or c) respite due to side-effects from vaccination is needed. To obtain a hotel/motel room, the person must accompany a designated shelter staff person to the hotel/motel to check-in and obtain a room key. Hotel/motel rooms stays are limited to 14 days. 	
Description of steps for admission, diversion, referral, and discharge for emergency shelters funded with ESG-CV.	 Steps for assessing whether a household needs a hotel/motel room, emergency shelter or should be referred to a TES. What are the admission requirements for someone to be eligible for a hotel/motel room, emergency shelter and/or TES? What triggers a referral locally for these interventions (ex: a full shelter; household meets the CDC criteria for someone at risk that cannot be placed in a congregate shelter, etc.)? For emergency shelter, length of stay limits if any; if the subrecipient has standards regarding the length of stay the standards should also include the process for requesting extensions. Description of referral pathways to isolation and quarantine if a household needs such services. Safeguards to meet the safety and shelter needs of special populations, such as victims of domestic violence, sexual assault, etc. Sample language: "X" shelter has not imposed a maximum length of stay to prevent participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infections when discharged. 	

	• Someone who presents at an ESG-funded shelter with respiratory symptoms (e.g., cough) will not be turned away solely because of their health symptoms.	
If applicable, describe how ES and Temporary Emergency Shelter (TES) prevents, prepares for, and/or responds to coronavirus.	 Sample language: Shelter staff monitors residents daily for symptoms of COVID- 19 and other illness. 	
	• Shelter staff monitors residents daily for any mental health or other supportive service needs or concerns.	
	• Shelter staff regularly reviews with residents alternative housing options that would provide greater safety from COVID-19 exposure.	
	• Shelter staff educates residents on the need for masks and other Personal Protective Equipment (PPE).	
Policies and procedures for assessment, prioritization, and reassessment of essential services related to emergency shelter.	During COVID-19, jurisdictions may consider changing assessment or prioritization to include COVID-19 vulnerabilities such as age, specific health conditions and/or medical frailty.	
	 Sample language: Under this state of emergency, the CoC has updated its prioritization policy to prioritize its emergency shelter and TES beds for people at high-risk of developing severe COVID-19 symptoms (aged 65+, people of all ages with underlying medical conditions, per CDC) and who are fleeing violence. A phased assessment approach is utilized to assist persons with their immediate needs, while also limiting long periods of contact. 	

Requirement	Important Components and Sample Language	Completed
Prioritization policy for determining which eligible	Subrecipients may update prioritization policies to house people at	
households will receive homelessness prevention or rapid rehousing assistance.	severe risk of contracting COVID.	
	Note, that further detail must be included if prioritization and	
	eligibility change due to subrecipient adoption of <u>CPD-21-05</u>	
	(04/14/21).	
	Sample language:	
	• Prioritization for RRH is based on households who meet HUD's	
	Category 1 and 4 criteria for homelessness and is prioritized by:	
	1) households with the longest history of homelessness; and 2) households with the most severe service needs including Covid-	
	19 related needs. No additional eligibility requirements (e.g.,	
	cannot require income, employment, sobriety, etc.) will be	
	considered. The individual or household is provided with rapid	
	access to permanent housing with minimal preconditions that	
	could serve as barriers. For example: good credit or good rental history cannot be required screening criteria.	
	Prioritization for Homelessness Prevention are households	
	earning less than 50% of AMI who are determined to have no	
	alternative resources and no other place to go.	
	Based on race equity analysis, the jurisdiction will target	
	prevention services to 3 marginalized areas of town (identify 3	
	areas). These 3 areas of town serve disproportionally large	
	communities of Black, Indigenous, and people of color who	
	experience homelessness. They have been historically underserved and had poor access to permanent housing solutions	
	offered by the homeless response system.	
	• The CES will prioritize placement of ESG-CV funded RRH programs for people who meet the state's protective health order that	
	provides non-congregate shelter to protect people experiencing	
	provides non-congregate shelter to protect people experiencing	

Homelessness Prevention (HP) and Rapid Rehousing (RRH)

	homelessness from becoming seriously ill from COVID. The protective health order outlines a variety of eligibility factors for non-congregate shelter. Validation of priority status must be obtained by the non-congregate shelter operator.	
Standards for determining the type, amount and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits (if any) on the homelessness prevention or RRH assistance that each program participant may receive (such as the maximum amount of assistance, maximum number of months the program participant may receive assistance, or the maximum number of times the program participant may receive assistance.	 Subrecipients may consider updating written standards in this area to provide opportunities to address the economic impact of COVID. Sample language: ESG-CV funds may be used to provide housing relocation and stabilization services and short and/or medium-term rental assistance necessary to prevent a household from moving into an emergency shelter or another place described in paragraph (1) of the "homeless" definition in 24 CFR 576.2. Homelessness Prevention costs are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. The agency recognizes the significant economic hardship on people at-risk of or experiencing homelessness. 	
Statement that a lack of income and health status does not preclude any household from receiving services.	 Sample language: Households without income are eligible to receive ESG-CV assistance in any of the following components: Street Outreach Emergency Shelter Homelessness Prevention Rapid Rehousing Programs do not use health status to discriminate access to programs; 	
Standard for determining the amount or percent of rent and utility payments that each household must	Subrecipients may consider updating their Written Standards in this area to provide opportunities to address the economic impact of COVID.	

pay while receiving homelessness prevention or RRH assistance.	 Sample language: Under the CARES Act, ESG-CV funding, there will be no rental payment requirement for households receiving financial assistance. Projects are expected to serve people with zero income. 	
If providing homeless prevention services, policies and supporting documentation for determining when services are provided during an Eviction Moratorium.	 Procedures that detail "reasonable assistance" provided to the household if being evicted for non-payment of rent. Include: policies for attempts to contact landlord, and what alternate resources to refer the household to. Documentation of the circumstances should be thorough and in the case file. Sample language: Households being evicted for non-payment of rent during a state and/or federal eviction moratorium may be eligible to receive homelessness prevention services if: a) the agency has attempted to contact the landlord/owner at least two times over email or phone to notify them of the eviction moratorium and no response has been received within 5 business days; b) referral to legal aid has not resolved the issue. When establishing whether "reasonable assistance" has been provided to the household's case file:	
Standards on how agency will document <u>rent</u> <u>reasonableness.</u>	Subrecipients must establish their own written policies and procedures for documenting comparable rents to establish	

	 transparency and consistency across all projects. Written policies and procedures should include: A methodology for documenting comparable rents Case file checklist and forms Standards for certifying comparable rents as reasonable Determination must be supported by documentation in case file Sample language: Although the ESG-CV notice waives the requirement that unit rent must not exceed Fair Market Rent (FMR)(24 CFR 576.106(d)(1)), agency staff must determine and document whether each rental unit meets rent reasonableness standards in accordance with 24 CFR 982.507. Comparable rents are evaluated using a market study of rents charged for units of different sizes in different locations. Rental housing data sources used are: property management companies and websites of rental listings such as Zillow, Hotpads and Apartments.com. Each program participant's case file includes a printout of three comparable unit' rents, and evidence that these comparison units share the same features (location, size, amenities, quality, etc.) 	
Standards on how agency will document lead- based paint inspections and housing inspections.	 All subrecipients must follow the minimum standards for compliance with the lead-based paint remediation and disclosure requirements identified in 24 CFR 576.403 and 578.99(f), including the Lead-Based Paint Poisoning Prevention Act, the Lead-Based Paint Hazard Reduction Act of 1992 and implementing regulations in 24 CFR part 35, subparts A, B, H, J, K, M and R. Sample language: When using ESG/ESG-CV funds for rental assistance, the agency follows all applicable lead-based paint requirements. Inspections are conducted by a HUD-certified Visual Assessor prior to program participant move-in. If during the assessment a deteriorated paint surface is discovered, property owners must 	

	remedy deteriorated paint surfaces in accordance with 24 CFR 35.1330(a) and (b) before ESG/ESG-CV funds can be used in the unit.	
Standards for determining how long a particular program participant will be provided with rental assistance and how participant need will be assessed and amount of assistance may be adjusted over time.	State whether maximum number of rental assistance months have been extended/adjusted to address unemployment, loss of income, or benefits due to COVID-19. Ensure Written Standards reflect the maximum period of assistance (24-months) a household can receive.	
	 Sample language: A progressive engagement model is used and supports using the least intensive intervention to help resolve homelessness for the household. Providers are to add more assistance only as necessary if the less intensive intervention is unsuccessful. RRH households receiving rental assistance subsidies must contribute a minimum of 30 percent of their monthly adjusted income toward their monthly rent. This tenant rent contribution may be adjusted at any time based on changes to their household income. There is no minimum rent requirement and tenant rent contribution may be zero for households with no income. A housing exit plan is developed between the client and caseworker where the client's income and progress are regularly reviewed. If needed, assistance will be extended for an additional 3 months (the maximum amount of assistance a client can receive is 24 months). 	
Description of re-evaluation requirements.	Subrecipients must provide a description of re-evaluation requirements. HUD does not require sub-recipients to conduct a re- evaluation outside of the regular re-evaluation process, however the subrecipient has the discretion to institute its own standards and may require each program participant receiving Rapid Rehousing or Homelessness Prevention to provide information about changes in income or other circumstances (e.g. household composition) that affect the program participant's need for assistance.	

	 Please note that if the subrecipient decides to conduct a re-evaluation and the program participant is no longer eligible for ESG-CV, assistance must be stopped at that time. Sample language: For Homelessness Prevention: Participants shall be re-evaluated not less than once every 6 months. Participants must have an income at or below 50% of Median Family Income at the time of re-evaluation. For Rapid Rehousing: Participants shall be re-evaluated not less than once annually. The participant shall be re-evaluated not less than once annually. The participant shall be re-evaluated not less than once annually. The participant shall have an annual income that does not exceed 30% of Median Family Income for the area or less, as determined by HUD at the time of annual re-evaluation. The participant must lack sufficient resources and support networks necessary to retain housing without ESG-CV assistance. 	
Confirmation that individuals and families experiencing homelessness must not be required to receive treatment or perform any other prerequisite activities as a condition of receiving shelter, rental assistance, or other services provided with ESG-CV funds.		
If applicable, describe policies and procedures governing landlord incentives.	ESG-CV funds may be used to pay for landlord incentives for households experiencing homelessness and at risk of homelessness. Landlord incentives may not exceed three times the rent charged for the unit (not the tenant portion of the rent). Security deposits, which are an eligible cost under 576.105(a)(2) of the ESG Program Interim Rule, are treated as separate and distinct types of assistance from landlord incentives and do not count against	

a program participant's months of landlord incentives or rental assistance.	
Eligible landlord incentives include:	
 Signing bonuses equal to two months of rent; Security deposits equal to up to three months of rent, or the state statute; Costs to repair damages incurred by the program participant not covered by the security deposit or that are incurred while the program participant is still residing in the unit Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances. 	
 Based on the requirements for landlord incentives in HUD's Notice CPD-20-08, recipients and subrecipients will need to document: Costs are reasonable and appropriate Costs are allowable and necessary to obtain housing for households experiencing homelessness and at-risk of homelessness Total amount for all incentives combined does NOT exceed three times the rent charged for the unit. 	
Landlord incentives are eligible within the Rapid Rehousing and Homelessness Prevention ESG-CV program components.	
 Sample language: One of the most significant barriers to individuals experiencing homelessness is obtainment of affordable housing. In an effort to increase the housing capacity, a \$500 signing bonus will be offered to landlords for each unit that is added to the housing inventory. 	