

TX-500 San Antonio and Bexar County Continuum of Care Policies and Procedures

**CONTINUUM OF CARE (COC) AND
EMERGENCY SOLUTIONS GRANT (ESG)
WRITTEN STANDARDS OF CARE**

SOUTH ALAMO REGIONAL ALLIANCE FOR THE HOMELESS



South Alamo Regional Alliance for the Homeless

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Important Notice Regarding COVID-19

In response to COVID-19, HUD released a [Mega Waiver](#) on March 31, 2020 containing a series of waivers and regulatory requirements for CPD programs including the Continuum of Care (CoC), Youth Homelessness Demonstration Program (YHDP), Emergency Solutions Grant (ESG), and Housing Opportunities for Persons with AIDS (HOPWA). Extensions and additional flexibilities were granted through subsequent memos found on the HUD Exchange. The most recent update occurred in December 2021 and waivers expired on March 31, 2022. On June 15, 2022, HUD released [Notice CPD-22-09](#), which allows for CoC, YHDP, ESG, and HOPWA recipients to apply for certain regulatory waivers through an expedited process to help prevent the spread of COVID-19 and facilitate assistance to eligible communities and households economically impacted by COVID-19. This waiver expires July 31, 2022.

On July 19, 2021, HUD released an updated ESG-CV Notice ([CPD-21-08](#)) that supercedes CPD-20-08, applying to all ESG-CV funds and all annual ESG funds used to prevent, prepare for, and respond to coronavirus. The Notice outlines a number of additional flexibilities and extensions of existing waivers. ESG-CV funding must be spent by September 31, 2023.

It is the responsibility of each subrecipient of federal funds to ensure program compliance with federal regulations. SARAH encourages CoC and ESG grantees to implement these waivers as needed.

Versions of document:

June 30, 2022	Inclusion of HUD Notice CPD-22-09; CFR references and expanded explanations in Emergency Shelter documentation section and Permanent Supportive Housing prioritization
February 24, 2022	Added training toolkit and policy and procedures resources to appendix; updated COVID-19 waiver information; roles and responsibilities in introduction; updated formatting to align with appendices
December 16, 2021	Inclusion of updated Street Outreach, Rapid Rehousing, and Homeless Prevention standards
October 28, 2021	Updated ESG-CV language; addition of second ESG-CV waiver
September 10, 2021	Inclusion of Emergency Transfer Plan; reformatting
February 26, 2021	Inclusion of duplication of benefits, addition of street outreach expense related to transportation, and addition of hygiene expenses with ESG-CV funding
December 17, 2020	Addition of ESG-CV Standards

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Introduction

Definition and Purpose of Written Standards

Written standards are community-wide policies and procedures that agencies funded through the federal department of Housing and Urban Development (HUD) for Continuum of Care (CoC) Program funding and Emergency Solutions Grant (ESG) Program funding are required to operationalize in their programs. Written standards include both requirements outlined by HUD in 24 CFR 578 (CoC) and [24 CFR 576 \(ESG\) as well as local standards implemented by the community of San Antonio and Bexar County](#).

The purpose of the written standards is to:

- Establish community-wide expectations on the operations of projects within the community;
- Ensure that the system is transparent to users and operators;
- Establish a minimum set of standards to manage the quality of CoC and ESG-funded projects' functioning in the community;
- Make local priorities transparent to CoC and ESG recipients and subrecipients; and
- Create consistency and coordination between CoC and ESG-funded projects within the San Antonio and Bexar County Continuum of Care.

The [CoC Program Interim Rule](#) and [24 CFR 578.37](#) outline the types of housing projects funded through the CoC Program that must comply with these standards, which includes: Permanent Supportive Housing (PSH); Rapid Rehousing (RRH); Transitional Housing (TH); and Transitional Housing-Rapid Rehousing (TH-RRH). Youth Homelessness Demonstration Program (YHDP) projects are required to follow the CoC Program Interim Rule. Locally designated CoCs are responsible for enforcing that CoC-funded programs operate within these standards. In the San Antonio/Bexar County Community, or TX-500, the CoC is the CoC Board of Directors, which governs the 501(c)3 nonprofit organization the South Alamo Regional Alliance for the Homeless (SARAH).

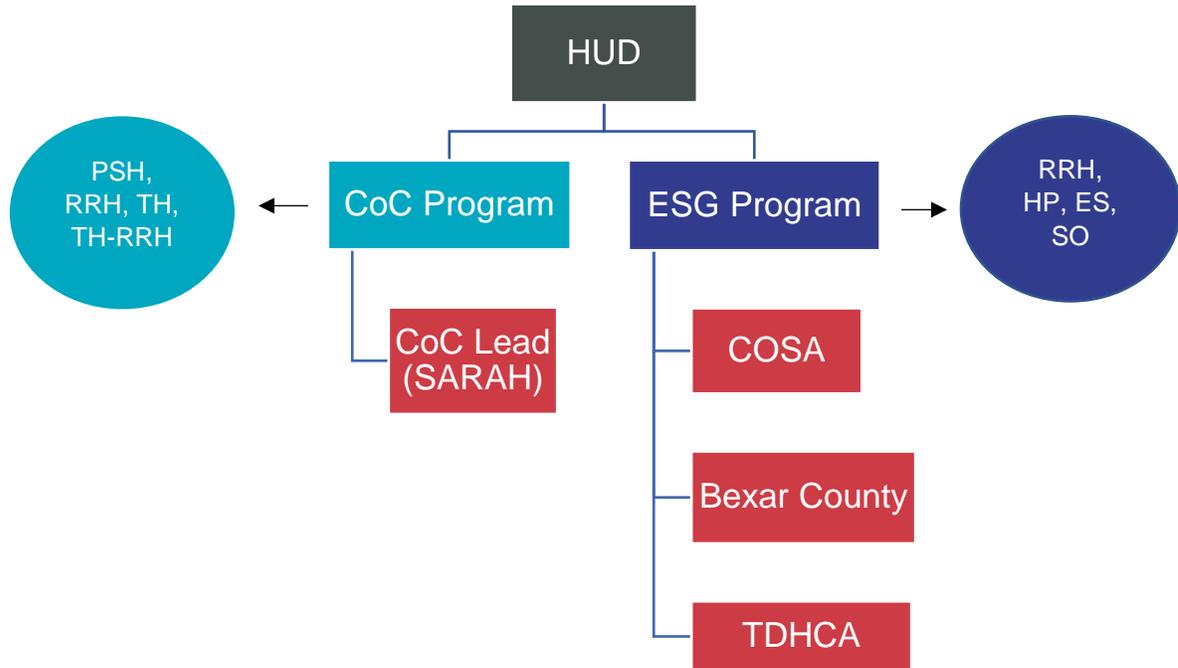
The CoC Program Interim Rule also requires CoCs to establish written standards in consultation with recipients of the ESG Program, consistent with the [ESG Program Interim Rule](#), which includes the City of San Antonio (COSA) and Bexar County. The ESG Program funds the following projects: Emergency Shelter (ES); Rapid Rehousing (RRH); Homeless Prevention (HP); and Street Outreach (SO), which are further described in [24 CFR Subpart B](#).

For each project type, the standards outline the purpose of the project type, eligibility criteria, prioritization, minimum standards of assistance, client access, and performance standards. At a minimum, CoC and ESG written standards must include:

- Policies and procedures for evaluating individuals' and families' eligibility for assistance in the CoC and ESG Programs;

- Policies and procedures for determining and prioritizing which eligible individuals and families will receive assistance for PSH, RRH, TH, HP, ES, and SO.
- Standards for determining what percentage of rent a program participant must contribute while enrolled in a RRH or HP project.

Local Roles and Processes



CoC Lead

As previously mentioned, the CoC Lead for the San Antonio/Bexar County geographical region is the CoC Board of Directors, which governs SARAH. The CoC Board of Directors is the final decision making body for the written standards and SARAH is the agency that coordinates with ESG-funded entities, enforces the standards locally, manages this document on the CoC website, and communicates changes to CoC and ESG programs. .

City of San Antonio and Bexar County

COSA and Bexar County are entitlement jurisdictions of ESG funds and may allocate funding to subrecipients to operate these projects in our community. COSA and Bexar County are responsible for ensuring their subrecipients operate within these written standards, along with their duties to report performance and grant spending to HUD. COSA and Bexar County coordinate closely with SARAH to ensure subrecipients are following written standards, utilizing the Homeless Management Information System (HMIS) to collect and report data, and accepting all referrals through the local Coordinated Entry System (CES).

Texas Department of Housing and Community Affairs (TDHCA)



TDHCA is an entitlement jurisdiction of ESG funding on behalf of the State of Texas and may allocate funding to subrecipients across the state to operate these projects. If selected annually by TDHCA, the CoC in San Antonio and Bexar County can act as the local coordinator of these funds by holding the funding competition and recommending funding to the TDHCA Board. This allows the CoC to make recommendations based on local priorities. The CoC does not oversee these funds, however, as TDHCA retains its authority as monitoring contracts and collecting performance data. The CoC will coordinate with subrecipients to ensure they are operating within local written standards, utilizing the HMIS to collect and report data, and accepting all referrals through the local CES.

Recipients and Subrecipients

Recipients and subrecipients of CoC and/or ESG funding are required to align their policies and procedures with the written standards and to stay closely coordinated with the CoC to make updates as approved by the CoC Board of Directors. CoC and ESG recipients and subrecipients may develop additional standards for administering program assistance so long as these additional standards do not conflict with those established in this document or those established by HUD. The CoC strongly encourages projects that do not receive CoC or ESG funds to utilize these written standards.

Process for Changes to Written Standards

Changes to the written standards are made in coordination with the CoC Board of Directors, COSA, and Bexar County and are in alignment with HUD guidance. Because these standards are community-driven, there is a process for agencies to submit public comment and recommend edits to this document. This form can be found at www.sarahomeless.org. There will be a 7-day public comment period for any edits being proposed that will be shared with the Board of Directors to assist in their vote. Requested edits will also go before a committee of community providers for recommendation to the Board of Directors. Changes will be communicated via email to CoC and ESG-funded agencies and updated to the CoC's website.

General Standards for All CoC and ESG Project Types

CoC and ESG recipients and subrecipients must follow requirements specified in 24 CFR 578 (CoC) and 24 CFR 576 (ESG) along with the following local standards. This section includes standards that are applicable to all project types that receive CoC and/or ESG program funding. The sections that follow are specific to certain project types. **Please be sure to note all standards applicable to a specific project type upon implementation of a program.**

Coordinated Entry System (CES) Participation (PSH, RRH, TH, TH-RRH Only)

Under the requirements of the CoC and ESG Program Interim Rules and [HUD CPD-17-01 Notice Establishing Additional Requirements for a CoC Centralized or Coordinated Assessment System](#), the San Antonio and Bexar County CoC has established a Coordinated Entry System (CES) that aims to increase the efficiency of the local crisis response system and improve fairness and ease

of access to resources. Providers funded through the CoC and ESG are required by law to accept housing referrals through CES, known locally as Homelink.

By utilizing a centralized referral system, Homelink:

- Reduces the burden on households experiencing a housing crisis
- Identifies the most appropriate housing resource to facilitate a rapid and permanent exit from homelessness
- Prioritizes the most vulnerable households with the longest time homeless for housing resources
- Collects system-wide data to inform necessary shifts in resources, identify gaps, and enable data-driven decision making at the CoC, organizational and project levels.

Agency staff must be trained in Homelink prior to accepting housing referrals. Agencies that wish to operate as Homelink Network Partners or Homelink Hubs must sign a Memorandum of Understanding (MoU) with SARAH and comply with all training requirements.

[Homelink Policies and Procedures can be found on the CoC's website here.](#)

Homeless Management Information System (HMIS) Participation

Reference: [24 CFR 578.57](#) (CoC) and [24 CFR 576.107](#) (ESG)

Under the requirements of the CoC and ESG Program Interim Rules and further defined by the Homeless Management Information System (HMIS) Proposed Rule, an HMIS is a locally administered, electronic data collection system that stores longitudinal person-level information about persons who access the homeless service system. The CoC Board of Directors designates the HMIS Lead, which currently is Haven for Hope.

Recipients and subrecipients of CoC and/or ESG Program funds are required to enter and maintain their project data in the local HMIS, which requires becoming a Contributory HMIS Organization (CHO) and signing into an agreement with Haven for Hope. The agency will be expected to adhere to data quality and confidentiality standards. Data from HMIS will be exported for annual reports due to HUD

Certain agencies are restricted by law from entering data into the HMIS. These agencies must establish a comparable database that meets HUD standards as outlined in [24 CFR 578.57 \(CoC\)](#) and [24 CFR 576.107](#) (ESG). Furthermore, these agencies must comply with data reporting as required by the HMIS and CoC. HMIS participation exceptions include: agencies that are defined as [Victim Service Providers](#) (VSPs); staff funded through or clients assisted through the Violence Against Women Act (VAWA), Victims of Crime Act (VOCA), or the Family Violence Prevention and Services Act (FVPSA).

Regardless of an agency's status as a VSP under the HEARTH Act, VSPs cannot use HMIS for if their agency receives funding from the Office of Violence Against Women (OVW), the Office for Victims of Crime (OVS), or Family-Violence Prevention and Services Act (FVPSA). This is an agency-specific restriction, not project-specific. For more resources related to this topic, visit the [HUD Exchange](#).



[HMIS Policies and Procedures can be found on Haven for Hope's website here.](#)

Homeless Participation

Reference: [24 CFR 578.75\(g\)](#) (CoC) and [24 CFR 576.405](#) (ESG)

Homeless participation ensures persons with lived experience in homelessness are included as part of the organization's decision-making structure and are authentically included in the operations of the project. Minimum standards for homeless participation are outlined in [24 CFR 578.75 \(g\)](#) (CoC) and [24 CFR 576.405](#) (ESG) and include the following:

- The provider must have at least one homeless individual or formerly homeless individual on the Board of Directors or equivalent policymaking entity of the provider.
- To the maximum extent possible, the provider shall involve homeless individuals and families in paid or volunteer work for the program.

Housing First

Housing First is an approach to connect individuals and families experiencing homelessness quickly and successfully to permanent housing without preconditions and barriers to entry, such as sobriety, treatment, or service participation requirements. Supportive services are offered to maximize housing stability and prevent returns to homelessness as opposed to addressing predetermined treatment goals prior to permanent housing entry. Housing First is premised on the following principles:

- Homelessness is first, and foremost, a housing crisis and can be addressed through the provision of safe and affordable housing.
- All people experiencing homelessness, regardless of their housing history and duration of homelessness, can achieve housing stability in permanent housing. Some may need very little support for a brief period, while others may need more intensive and long-term supports.
- Everyone is "housing ready." Sobriety, compliance in treatment, or clean criminal records are not necessary to succeed in housing. Rather, homelessness programs and housing providers must be "consumer ready".
- Many people experience improvements in quality of life, in the areas of health, mental health, substance use, and employment, as a result of achieving housing.
- People experiencing homelessness have the right to self-determination and should be treated with dignity and respect.
- The exact configuration of housing and services depends upon the needs and preferences of the population.

[Visit the HUD Exchange to learn the core principles of Housing First and to download a checklist to ensure your project is operating according to these principles.](#)



Fair Housing and Equal Access

Reference: [24 CFR 578.93](#) (CoC) and [24 CFR 576.403](#) (ESG)

HUD is committed to enforcing the federal [Fair Housing Act](#) and codified commitment in the [Equal Access Rule](#) to the fair administration of its projects to serve participants regardless of sexual orientation, gender identity, family composition, or marital status. CoC and ESG recipients and subrecipients must abide by the following:

- Comply with all federal statutes and rules including the Fair Housing Act, the Americans with Disabilities Act, Equal Access to Housing Final Rule, and Equal Access in Accordance with an Individual's Gender Identity Rule.
- Include non-discrimination policies in their program policies and procedures and assertively outreach to people least likely to engage in the homeless system. This includes, but not limited to, chronically homeless, homeless veterans, youth, families with children, LGBTQ+, and victims of domestic violence.
- Recognize that individuals who present together for assistance, regardless of age or relationship, are considered a household and are eligible for assistance as a household.
- If a project serves families with children, serve all types of families with children; if a project targets a specific population (e.g., women with children), serve all families with children that are otherwise eligible for assistance, including families with children that are headed by a single adult or consist of multiple adults that reside together.
- Cannot deny a family's admission to a project based on the age and gender of a child in the household under 18.
- Incorporate participant choice and provide case management in a person-centered approach.Practice

Termination and Appeals Procedures

Reference: [24 CFR 578.91](#) (CoC) and [24 CFR 576.402](#) (ESG)

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 CoC program must be consistent with 578.91 and 576.402 for those projects funded through the ESG program. Participants who are to be terminated must be provided written notice containing a clear statement of the reasons for termination.

Minimum Requirements

- Participants may request an appeal verbally, in writing, or both. If verbally, it must be documented in case notes.
- The provider will respond in writing to the appeal request as soon as possible but no later than thirty (30) calendar days following the request.
- As part of the appeal, the participant may present written, oral objections, or both before a person other than the person (or a subordinate of that person) who made the decision that is subject to appeal.

- The participant may be represented in the appeal but neither the CoC, ESG recipient, nor the provider is responsible for providing or funding someone to represent the participant.
- The participant may be represented but the CoC Board is not responsible for providing representation.
- The CoC Board may designate a subcommittee to hear appeals.
 - If the appeal has been designated to a subcommittee, the participant shall have the right to appeal to the CoC Board.
- Appeals shall be addressed within sixty (days) calendar of receipt of the appeal by the Board.
- Participants will receive prompt written notification of the outcome of the appeal.

Appeals Process

All CoC and ESG funded providers must provide a written copy of their program's rules and the termination process, and the right to appeal, before the participant begins to receive assistance. The initial appeal of any decision shall be made to the ESG or CoC funded provider pursuant to the process described below. Should the participant not be satisfied with the appeal decision, they have the right to appeal that decision to the CoC Board. The CoC Board shall follow the process for appeals specified below.

Reasons for Appeal

- The decision whether to admit the participant into the program
- The determination of the household's income or the households calculated rent
- Payment/occupancy charge
- Denial of a request to add a member to the assisted household
- Whether to terminate the participation of any participant

Minimum Appeal Requirements

- Participants may request an appeal verbally, in writing, or both.
- The provider will respond in writing to the appeal request as soon as practicable but no later than thirty (30) calendar days following the request.
- As part of the appeal, the participant may present written or oral objections before a person other than the person (or a subordinate of that person) who made the decision that is subject to appeal.
- The participant may be represented in the appeal but neither the CoC, ESG recipient nor the provider is responsible for providing or funding someone to represent the participant.

A Appeals of Decisions to Terminate

- These decisions must be made in compliance with [24 CFR 576.402](#) or [578.91](#).

Appeals of Decisions Other Than to Terminate the Participant from the Program

- These appeals are initiated by the participant. The participant must notify the CoC or ESG funded provider that he/she wishes to appeal a decision or determination of the provider.

Appeals to the CoC Board

If the participant is not satisfied with the response to his/her appeal from the CoC or ESG funded provider, the appeal may be made to the Board. Minimum requirements include:

- The appeal may be in writing, orally or both.
- The participant may be represented but the CoC Board is not responsible for providing representation.
- The CoC Board may designate a subcommittee to hear appeals.
 - If the appeal has been designated to a subcommittee, the participant shall have the right to appeal to the CoC Board.
- Appeals shall be addressed within sixty (60) calendar days of receipt of the appeal by the Board.
- Participants will receive prompt written notification of the outcome of the appeal.

Emergency Transfer Plan

Reference: [24 CFR 578.99\(j8\)](#) (CoC) and [24 CFR 576.409\(d\)](#) (ESG)

Survivors of domestic violence, dating violence, stalking and human trafficking living in federally assisted housing may need to move to another subsidized unit to protect their safety and maintain affordable housing. In accordance with the [HUD Final Rule Regarding the Implementation of Housing Protections Authorized in the Violence Against Women Reauthorization Act of 2013 \(VAWA\)](#), the San Antonio and Bexar County CoC coordinates emergency transfers when survivors need to move to another safe and available subsidized unit.

The San Antonio and Bexar County CoC has adopted an emergency transfer plan that identifies those who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance on safety and security. That plan is included in **Appendix C**.

Recipients and subrecipients of federal, county, or state funds for Permanent Supportive Housing, Rapid Rehousing, and Transitional Housing projects must:

- Follow the CoC's Emergency Transfer Plan;
- Make the transfer plan publicly available whenever feasible;
- Make the plan available to participants and community partners upon request
- Ensure that refusal of a transfer unit is not a basis for terminating a tenant from assistance.

Recipients and subrecipients are encouraged, but not required, to bear moving costs related to emergency transfers. As necessary, providers are encouraged to work with survivors to identify ways to pay for moves associated with emergency transfers.

Access to Mainstream Resources

Reference: [24 CFR 578.1\(b3\)](#) (CoC) and [24 CFR 576.400\(c\)](#) (ESG)



Recipients and subrecipients should assess and assist participants with obtaining any mainstream resource for which they may be eligible for including: Temporary Assistance for Needy Families (TANF), Veteran Health Care, Food Stamps, Medicaid, Children’s Health Insurance Program (CHIP), Social Security Income (SSI)/Social Security Disability Income (SSDI), Texas Workforce Commission (TWC), etc. Where possible, recipients should streamline processes for participants to apply for mainstream benefits such as the use of a singular form to apply for benefits or collecting necessary information in one step.

Displacement

Reference: [24 CFR 578.83](#) (CoC) and [24 CFR 576.408](#) (ESG)

A “displaced person” is defined as any participant that moves from a permanent home because of CoC- or ESG-funded acquisition, rehabilitation, or demolition of a project. The acquisition of real property for an ESG/CoC funded project is subject to the Uniform Act (URA) and Federal government wide regulations.

Displaced participants shall be provided relocation assistance and advised of their Fair Housing Rights. No temporary relocation shall be required for a CoC- or ESG--funded project. When a participant must move for a CoC- or ESG---funded project, the participant shall be treated as permanently displaced and offered relocation assistance and payments.

A participant who disagrees with the recipient’s determination concerning whether the person qualifies as a displaced person or the amount of relocation assistance may file a written appeal with SARAH. If it is determined that the appeal has merit, the appeal will be heard by the CoC Membership Council. The CoC Board will make a final determination.

Minimum standards for reducing the displacement of persons (families, individuals, businesses, nonprofit organizations, and farms) because of a project assisted under CoC and ESG shall comply with §576.408 and 578.83, respectfully. No provider may implement any project or activity funded with either CoC or ESG funds without specific approval of the CoC Board of Directors. Homeless assistance funding is limited and projects involving displacement will only be approved if there is a significant disproportionate benefit provided.

Exceptions to displacement include a participant who:

- Was evicted based on a violation of the lease or occupancy agreement or violation of the law and the recipient determines that the eviction was not undertaken to evade the obligation to provide relocation assistance.
- Moved into the property after the application was submitted but was provided with written notice that he or she would not qualify as a “displaced person.”
- Is ineligible under [49 CFR 24.2](#).
- Was not displaced as a result of the project by determination from HUD.

Involuntary Family Separation

Reference: [24 CFR 576.102\(b\)](#) (CoC) and [24 CFR 578.93\(e\)](#) (ESG)



The age and gender of a child under age 18 must not be used as a basis for denying a family's admission to a housing or shelter project. All recipients and subrecipients of CoC and ESG program funds are required to comply with program admission and prohibition against involuntary family separation standards ([24 CFR 576.102\(b\)](#) and [578.93\(e\)](#)).

Program Coordination

Recipients and subrecipients of CoC and ESG program funds are expected to maintain the minimum standards for on-going system and program coordination and integration of CoC- and ESG-funded activities to the maximum extent practicable. This includes coordination with the following:

- Street Outreach (SO) providers
- Emergency Shelter (ES) providers
- Homelessness Prevention (HP) providers
- Transitional Housing (TH) providers
- Permanent Supportive Housing (PSH) providers
- Rapid Rehousing (RRH) assistance providers

Other Homeless Assistance Programs

- HUD-Veterans Affairs Supportive Housing (HUD-VASH);
- Education for Homeless Children and Youth Grants for State and Local Activities (McKinney-Vento Homeless Assistance Act);
- Grants for the Benefit of Homeless Individuals;
- Healthcare for the Homeless;
- Programs for Runaway and Homeless Youth;
- Projects for the Assistance in the Transition from Homelessness;
- Services in Supportive Housing Grants;
- Emergency Food and Shelter Program;

Mainstream Services & Housing Programs

- Public housing programs assisted under section 9 of the U.S. Housing Act of 1937;
- Housing programs receiving Section 8 tenant based or project-based assistance;
- Supportive Housing for Persons with Disabilities;
- HOME Investment Partnerships Program;
- Temporary Assistance for Needy Families
- Other essential services providers
- Transitional Housing Assistance Grants for Victims of Sexual Abuse, Domestic Violence, and Stalking Program;
- Homeless Veterans Reintegration Program;
- Domiciliary Care for Homeless Veterans Program;
- VA Homeless Providers Grant and Per Diem Program;
- Health Care for Homeless Veterans Program;



- Homeless Veterans Dental Program;
- Supportive Services for Veterans Families Program; and
- Veterans Justice Outreach Initiative
- Health Center Program;
- State Children’s Health Insurance Program;
- Head Start;
- Mental Health and Substance Abuse Block Grants;
- Services funded under the Workforce Investment Act; and
- State Housing Related Assistance Program for Adults with Serious Mental Illness

Connections with Other Resources

Reference: [24 CFR 578.53](#) (CoC) and [24 CFR 576.105](#) (ESG)

Recipients and subrecipients of CoC and ESG program funds are expected to follow the minimum standards for assisting each participant in connecting with other supportive and stabilization resources (as applicable). Appropriate supportive services and stabilization resources include the following:

Supportive Services

- Permanent housing;
- Medical health treatment;
- Behavioral health services;
- Counseling;

Stabilization Services

- Medicaid;
- Medicare;
- Supplemental Nutrition Assistance Program;
- Women, Infants, and Children (WIC);
- Federal-State Unemployment Insurance Program;
- Supervision; and

Other services Needed for Independent Living

- Supplemental Security Income (SSI);
- Social Security Disability Insurance (SSDI);
- Child and Adult Care Food Program; and
- Other available assistance

Income Determination

Reference: [24 CFR 5.609](#) (CoC & ESG)



Recipients and subrecipients of CoC and ESG program funds are expected to comply with the minimum standards for determining participants' annual income. This includes calculating income in compliance with [24 CFR 5.609](#). Annual income is defined as all amounts, monetary or not, which:

- Go to, or on behalf of, the family head or spouse (even if temporarily absent) or to any other family member; or
- Are anticipated to be received from a source outside the family during the 12- month period following admission or annual reexamination effective date; and
- Which are not specifically excluded in [paragraph \(c\) of 24 CFR 5.609](#).

Annual income also means amounts derived (during the 12-month period) from assets to which any member of the family has access.

There are no income limits for CoC assistance but in instances when participants are charged rent or occupancy charges, the amount charged must be based on participants' verified annual income for all sources.

In verifying income, CoC and ESG funded recipients are required to obtain source documents whenever possible. Self-certification or verification is to be accepted only when all efforts to obtain source documents or third-party verification have not produced results.

Records and Recordkeeping

Reference: [24 CFR 578.103](#) (CoC) and [24 CFR 576.500](#) (ESG)

Recipients and subrecipients of CoC and ESG program funds must follow ensure sufficient written records are established and maintained to enable the recipient, the CoC Lead Agency, and HUD to determine whether CoC and ESG requirements are being met and comply with [24 CFR 576.500](#) and [24 CFR 578.103](#).

Duplication of Benefits

Reference: [44 CFR 206.191](#) (CoC & ESG)

"Duplication of benefits" occurs when federal financial assistance is provided to a person or entity through a program to address losses resulting from a federally-declared emergency or disaster, and the person or entity receives or would receive financial assistance for the same costs from any other source, and the total amount received exceeds the total need for those costs. Recipients and subrecipients of CoC and ESG program funds must establish and maintain adequate procedures to prevent any duplication of benefits with emergency disaster funds.

Lead-Based Paint Standards

Reference: [24 CFR 578.99\(f\)](#) (CoC) and [24 CFR 576.403](#) (ESG)

Recipients and subrecipients of CoC and ESG program funds must follow 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 [Residential 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](#).

Recovered Materials

Reference: [24 CFR 578.99\(b\)](#) (CoC) and [24 CFR 576.407\(f\)](#) (ESG)

All recipients and subrecipients of CoC and ESG program funds must follow minimum standards for the procurement of recovered materials and shall comply with the requirements identified in [24 CFR 576.407\(f\)](#) and [24 CFR 578.99\(b\)](#), including that the recipient and its contractors must comply with [Section 6002 of the Solid Waste Disposal Act 29](#), as amended by the [Resource Conservation and Recovery Act](#). The requirements of Section 6002 include procuring only items designated in guidelines of the Environmental Protection Agency (EPA) at [40 CFR part 247](#) that contain the highest percentage of recovered materials practicable, consistent with maintaining a satisfactory level of competition, where the purchase price of the item exceeds \$10,000 or the value of the quantity acquired by the preceding fiscal year exceeded \$10,000; procuring solid waste management services in a manner that maximizes energy and resource recovery; and establishing an affirmative procurement program for procurement of recovered materials identified in the EPA guidelines.

Faith-Based Activities

Reference: [24 CFR 578.87](#) (CoC) and [24 CFR 576.406](#) (ESG)

All recipients and subrecipients of CoC and ESG program funds must follow minimum standards for faith-based activities outlined in [24 CFR 576.406](#) and [578.87](#).

Program Income

Reference: [24 CFR 578.97](#) (CoC) and [24 CFR 576.201\(f\)](#)

Recipients and subrecipients of CoC and ESG program funds must follow minimum standards for private non-profit organizations regarding the program's income during the project period. Income shall be retained and used to finance the non-federal share of the project or program. Records of the receipt and use of program income shall be retained. Under the ESG Program, program income is to be used as match, and ESG match funds must be used in accordance with [24 CFR 576.201\(f\)](#). This includes a requirement that matching funds must be contributed to the ESG program and expended for the recipient or subrecipient's allowable ESG costs.

Organizational Conflicts of Interest

Reference: [24 CFR 578.95](#) (CoC) and [24 CFR 576.404](#) (ESG)

An organizational conflict of interest arises when activities or relationships with other persons or organizations (the recipient or subrecipient) is unable or potentially unable to render impartial assistance in the provision of any type or amount of assistance. Such an organizational conflict

would arise when a board member of an applicant participates in a decision concerning the award of a grant, or provision of other financial benefits to the organization that member represents. It would also arise when an employee of a recipient or subrecipient participates in making rent reasonableness determinations under [24 CFR 578.49\(b\)\(2\)](#) and [578.51\(g\)](#) and housing quality inspections of property under [24 CFR 578.75\(b\)](#) that the recipient, subrecipient, or related entity owns.

CoC and ESG assistance will not be contingent on the individual's or family's acceptance or occupancy of emergency shelter or housing owned by the provider or a provider's subsidiary or parent. No recipient or subrecipient, with respect to individuals or families occupying housing owned by the recipient or a recipient's subsidiary or parent, will carry out the initial evaluation under [24 CFR 576.401](#) or [578.75\(b\)](#) or administer homelessness prevention assistance under [24 CFR 576.103](#).

Individual Conflicts of Interest

Reference: [24 CFR 84.42](#) (private, non-profit) or [24 CFR 85.36](#) (government)

When procuring goods and services, the provider will comply with codes of conduct and conflict of interest requirements under 24 CFR 84.42 (private non-profit) or 24 CFR 85.36 (government). No CoC Board of Directors member may participate in or influence discussions or resulting decisions concerning the award of a grant or other financial benefits to the organization that the member represents.

Prohibited Conflicts

No person involved with the CoC or ESG programs or who is in a position to participate in a decision-making process or gain inside information regarding the program's activities, shall obtain a financial interest or benefit from an assisted activity; have a financial interest in any related contract, subcontract, or assisted activity; or have a financial interest in the activity's proceeds (either personally or those with whom they have family or business ties) during their tenure or for one year following tenure.

Persons Covered

These conflict of interest provisions apply to any employee, agent, consultant, officer or elected or appointed official of the recipient or subrecipient's agency. The key issues to consider are the individual's role in the organization, influence over CoC and ESG funding decisions, and access to inside information.

Exceptions

A recipient may request an exception to the individual conflicts of interest provision from HUD, only if he or she meets the threshold requirements identified in 24 CFR 576.404 or 578.95(d)(2).

Rapid Rehousing (RRH) and Homeless Prevention (HP) Programs – CoC (RRH) and ESG (RRH and HP)

Reference: [24 CFR 578.37\(1\)ii](#) (CoC) and [24 CFR 576.103](#) & [576.104](#) (ESG)

Rapid Rehousing (RRH) and Homelessness Prevention (HP) programs provide housing relocation and stabilization services and short or medium-term rental assistance to help a family or individual retain permanent housing or move as quickly as possible to permanent housing and achieve stability in that housing.

RRH and HP projects are required to operate in compliance with the local RRH-HP Program Standards, included as an addendum to these written standards.

Participant Eligibility

Rapid Rehousing (RRH)

There are no income limits for CoC assistance but in all instances in which participants are charged rent or occupancy charges, the amount charged must be based on participants verified annual income for all sources. All participants must lack sufficient resources or support networks to retain housing without ESG or CoC assistance. Individuals & families assisted under ESG are required to have annual incomes at or below 30% of the area median at annual assessment.

RRH can pay short-term (up to 3 months) and medium-term (between 4-24 months) rental assistance, up to 24 months total during a 3-year period in tenant-based or project-based housing. Project-based rental assistance for RRH is allowable for ESG funded programs only.

- The 24 months may include a one-time payment for up to 6 months of rent arrears on the tenant's portion of the rent (arrears covered under ESG only).
- Rent amount must not exceed HUD's published Fair Market Rent (ESG-funded RRH only) and the HUD standard for rent reasonableness (ESG- and CoC- funded RRH) (24 CFR 982.507).
- There must be a rental assistance agreement between the landlord and agency and a legally binding, written lease between tenant and landlord.
- Eligibility and income shall be reviewed no less frequently than annually.
- Participants in rapid rehousing are required to meet with case managers no less frequently than monthly.

Homelessness Prevention (HP)

To be eligible for HP relocation and stabilization services and short-term and medium-term rental assistance, people must qualify as "at risk of homelessness" based on categories 2 or 4 of the HUD "homeless" definition, or based on the "at risk of homelessness" definition found at 24 CFR 576.2, require HP services to prevent moving into an emergency shelter or another place described in category (1) of the "homeless" definition in 24 CFR 576.2, have an annual income below 30% of the median income for the area and be a resident of Bexar County for at least 30

days prior to requesting assistance. (24 CFR 576.103, 576.105, 576.106). Households should be identified and prioritized for assistance using the targeted screening tool in alignment with the RRH-HP Standards.

Rental Assistance Duration and Adjustment

For ESG, payment shall not exceed 24 months total during a 3-year period in tenant- or project-based housing.

For CoC, rental payments shall not exceed 24 months.

Re-Evaluations

Rapid Rehousing (RRH)

- Participants shall be re-evaluated not less than once annually. Eligibility:
 - The participant shall have an annual income that does not exceed 30 percent of median family income for the area or less, as determined by HUD at the time of annual re-evaluation [ESG only]; and
 - The participant shall lack sufficient resources and support networks necessary to retain housing without ESG/CoC assistance.

Homeless Prevention (HP)

- Participants shall be re-evaluated not less than once every three months.

Permanent Supportive Housing (PSH) Programs – CoC Only

Reference: [24 CFR 578.37\(1\)j](#) (CoC)

Permanent Supportive Housing (PSH) for persons with disabilities is permanent housing with indefinite leasing or rental assistance paired with supportive services to assist homeless persons with a disability or families with an adult or child member with a disability achieve housing stability.

Minimum Standards

Minimum standards for shelters and program participant-occupied housing consist of compliance with the safety, sanitation & privacy requirements identified in 24 CFR 576.403 and 578.75. Providers shall not use ESG or CoC funding to help someone remain or move into housing if the housing does not meet the following minimum habitability standards:

- Structure and Materials: The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Space and security: Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Interior air quality: Each room or space must have proper ventilation and be pollutant free.
- Water supply: Must be free of contamination.

- Sanitary facilities: Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment: The housing must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity: The structure must have adequate and appropriate lighting and safe electrical sources.
- Food preparation: All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- Sanitary conditions: The housing must be in sanitary condition.
- Fire safety:
 - There must be a second means of exiting the building in the event of an emergency.
 - Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.
 - If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies.
 - The public areas of the housing must be equipped with enough detectors, but not less than one for each area.

Participant Eligibility

Individuals and families who meet the federal criteria under category (1) or (4) of the “homeless” definition in [24 CFR 576.2](#).

- All referrals must come from the local Coordinated Entry System and utilize the HUD recommended Order of Priority ([HUD Notice CPD-16-11](#)):
 - Priority 1
 - Households (HH) experiencing homelessness based on the length of time the individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter, and
 - There is a household member with a disability, and
 - The household has been identified as having severe service needs.
 - Priority 2
 - Households (HH) experiencing chronic homelessness based on the length of time the individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter, and
 - There is a household member with a disability and,
 - The household has not been identified as having severe service needs, and
 - There are no eligible households that meet the criteria under Priority 1.
 - Priority 3

- Households (HH) experiencing homelessness based on the length of time the individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter. HH has experienced less than 12 months cumulative across four episodes in three years, and
- There is a household member with a disability, and
- The household has been identified as having severe service needs, and
- There are no eligible households that meet the criteria above priorities.
- Priority 4
 - Households (HH) experiencing homelessness based on the length of time the individual or family has resided in a place not meant for human habitation, a safe haven, or an emergency shelter. HH has experienced less than 12 months cumulative across four episodes in three years, and
 - There is a household member with a disability, and
 - The household has not been identified as having severe service needs, and
 - There are no eligible households that meet the criteria above priorities.
- Must follow any additional eligibility criteria set forth in the NOFO through which a project was funded and the grant agreement (e.g. Projects originally funded under the Samaritan Housing Initiative must continue to serve chronically homeless individuals and families; projects funded under the Permanent Supportive Housing Bonus must continue to serve the homeless population outlined in the NOFO under which the project was originally awarded).
- Programs may not establish additional eligibility requirements beyond those specified here and those required by funders.

Additional Requirements for PSH Projects w/ Rental Assistance

- Calculation of the rental payment amount shall only include monthly rent for the unit, any occupancy fees under the lease (except for pet and late fees) and if the participant pays separately for utilities, the monthly utility allowance established by the public housing authority for the area in which the housing is located.
- Payment for rental assistance shall only be made when there is a rental assistance agreement between the provider and the owner, which sets forth the terms under which rental assistance will be provided, including the prior requirements; a requirement that the owner provide the subrecipient with a copy of any notice to vacate given to the participant or any complaint used to commence an eviction action; and the same payment due date, grace period and late payment penalty requirement as the participant's lease.
- Payment of any late payment penalties incurred by the agency shall not be claimed for reimbursement.
- Payment shall only be made when there is a legally binding, written lease for the rental unit between the participant and the owner.

Participant Contribution

Rent charges may not exceed those specified in CFR 578.7734.



Transitional Housing (TH) Programs – CoC Only

Reference: [24 CFR 578.37\(2\)](#) (CoC)

Transitional Housing (TH) is designed to provide homeless individuals and families with interim stability and support to successfully move to and maintain permanent housing. ESG funds may not be provided to help individuals to remain in or move to transitional housing.

Minimum Standards

Transitional housing facilitates the movement of homeless individuals and families to permanent housing within 24 months of entering the program. Eligible persons for transitional housing meet the homeless definition based on categories 1 and 4. Providers of transitional housing services shall arrange for or make available services to participants to assist them in securing permanent housing within specified time periods. Transitional housing may be provided in scattered site or single site locations. Individuals and families assisted in transitional housing shall be provided housing accommodations as well as a services program intended to address issues that may hinder the household from obtaining or maintaining stable, long-term housing.

Safety, Sanitation, and Privacy

Providers shall not use ESG or CoC funding to help someone remain or move into transitional housing that does not meet the following minimum habitability standards:

- Structure and Materials: The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Space and security: Each resident must have adequate space and security for themselves and their belongings and an acceptable place to sleep.
- Interior air quality: Each room or space must have proper ventilation and be pollutant free.
- Water supply: Must be free of contamination.
- Sanitary facilities: Residents must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment: The housing must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity: The structure must have adequate and appropriate lighting and safe electrical sources.
- Food preparation: All food preparation areas contain suitable space and equipment to store, prepare, and serve safe and sanitary food.
- Sanitary conditions: The housing must be in sanitary condition.
- Fire safety:
 - There must be a second means of exiting the building in the event of an emergency.
 - Each unit must include at least one properly working smoke detector on each occupied level of the unit, located when possible in a hallway adjacent to a bedroom.

- If the unit is occupied by a hearing-impaired person, smoke detectors must have an alarm system designed for hearing-impaired persons in each bedroom he or she occupies.
- The public areas of the housing must be equipped with enough detectors, but not less than one for each area.

Participant Eligibility

Transitional Housing (TH) programs will receive referrals based on the prioritization established in the local Coordinated Entry Policies and Procedures. This prioritization will be updated periodically through the Coordinated Entry Committee based on subpopulation data and community input. The following target populations are HUD's preferred focus for Transitional Housing:

- Youth,
- Persons seeking to continue recovery in recovery-focused housing,
- Institutional re-entry (may not be eligible for CoC funding but needed for people leaving criminal justice and mental health facilities),
- Persons fleeing domestic abuse or violence where it is not possible to find units for rapid rehousing

Limitations on Occupancy

No individual or family may be assisted in transitional housing for a period of more than 24 months. No person shall be discharged from transitional housing into homelessness because of this limitation. Transitional housing programs are expected to place individuals and families into permanent housing as quickly as possible.

Participant Contribution

Individuals and families residing in transitional housing are not required to pay rent. Providers of transitional housing may impose occupancy charges. If the provider elects to charge rent or occupancy charges, the charges may not exceed those specified in 24 CFR 578.77.

Program Fees

No fees other than rent or occupancy charges may be charged to program participants. This includes meals, copayments for services, transportation and all other services that may be provided to program participants.

Occupancy Agreements

All individuals and families served in transitional housing must be provided an occupancy agreement for a minimum of a monthly term and which can be renewed provided that the household does not remain in transitional housing for longer than 24 months. The agreement must specify the expectations for safety in housing and program expectations. Residents in transitional housing may not be discharged for failure to participate in services. No person may

be terminated from transitional housing without first being provided the right to appeal that decision in accordance with the due process provisions at [24 CFR 578.91\(b\)](#).

Emergency Shelter (ES) Programs – ESG Only

Reference: [24 CFR 576.102](#) (ESG)

An effective crisis response system provides immediate and low-barrier access to safe and decent shelter to anyone that needs it and aims to house people as quickly as possible. Emergency shelters, and other types of crisis housing, play a critical role in the community’s system response and strategy to end homelessness.

Participant Eligibility

People are eligible for these services if they qualify as “homeless” based on categories (1, 2, or 4) of the “homeless” definition found at [24 CFR 576.232](#). Eligible activities, in compliance with federal ESG rules in addition to the provision of decent, safe, and sanitary emergency shelter accommodations include:

- Case management;
- Child Care;
- Education,
- Employment and Life Skills Services;
- Legal Services;
- Health,
- Mental Health and Substance Abuse Services;
- Transportation

Minimum Standards

Safety, Sanitation, & Privacy

- Any building for which ESG funds were used for conversion, major rehabilitation, or other renovation or that receives ESG assistance for shelter operations shall meet state/local government safety and sanitation standards, as well as the following:
- Structure and materials: The building must be structurally sound, protect participants from the elements and not pose any threats to their health or safety.
- Products and appliances: Any ESG funded renovation, including major rehabilitation and conversion, must use Energy Star and WaterSense products/appliances.
- Access: The shelter must comply with the applicable Rehabilitation, Fair Housing and Americans with Disabilities Acts and implement regulations.
- Space and security: Unless it is a day shelter, it must provide appropriate places to sleep, adequate space, and security for residents and their belongings.
- Interior air quality: Each shelter room/space must have proper ventilation and be pollutant free.
- Water supply: Must be free of contamination.

- Sanitary facilities: Each participant must have access to sufficient, sanitary facilities that are in proper operating condition, private and adequate for personal cleanliness and disposal of human waste.
- Thermal environment: The shelter must have the necessary, properly operating heating/cooling facilities.
- Illumination and electricity: The shelter must have adequate and appropriate lighting and safe electrical sources.
- Food preparation: Any food preparation areas must be able to store, prepare, and serve safe and sanitary food.
- Sanitary conditions: The shelter must be in sanitary condition.
- Fire safety: Each occupied unit of the shelter must have at least one working smoke detector and when possible, they should be near sleeping areas. The fire alarm system must be designed for hearing-impaired residents. All public areas must have at least one working detector and there must be a second means of exiting the building in the event of an emergency.

Shelter Diversion

Shelter Diversion is a strategy that prevents homelessness at the front door by helping to identify immediate alternate housing arrangements and, if necessary, connecting people experiencing homelessness with services and financial assistance to help them return to permanent housing. Diversion should be attempted with all households seeking homeless services assistance.

Eligibility Documentation

Providers of Emergency Shelter services shall admit individuals and families who meet the HUD definition of “homeless,” as specified in 24 CFR 576.2 (1, 2, & 4) and agencies’ eligibility criteria. No provider funded under ESG or the CoC program may serve homeless persons in Category 3 until it has been notified by SARA that a request has been made to serve this population and the request has been approved by HUD.

Recipients and subrecipients are required to document eligibility at program entry, even for emergency shelters. Given that third-party documentation at the emergency shelter level is not feasible in most cases, subrecipients operating emergency shelters can document homeless status through a certification by the individual or head of household as the primary method of establishing homeless eligibility. In these instances, one method of meeting this standard would be to require households to complete a sign-in sheet, with a statement at the top informing the individual or head of household that by signing, they certify that they are homeless.

Under no circumstances must the lack of third-party documentation prevent an individual or family from being immediately admitted to emergency shelter, receiving street outreach services, or being immediately admitted to shelter or receiving services provided by a victim service provider.

Assessment

- Individuals and families shall be assessed for Coordinated Entry using the CoC-Approved Coordinated Entry assessment, and that assessment must be recorded into HMIS.

- Families and individuals remaining in shelter for longer than thirty (30) days shall be reassessed by a Case Manager for housing every 30-45 days.

Intake

When appropriate, based on the individual's needs and wishes, the provision of or referral to Homelessness Prevention (HP) or Rapid Rehousing (RRH) services that can quickly assist individuals to maintain or obtain safe, permanent housing shall be prioritized over the provision of Emergency Shelter (ES) or Transitional Housing (TH) services. Emergency shelters will prioritize shelter services for those:

- Individuals and families lacking other resources in the community even if limited assistance could be provided to end their homelessness.
- Are literally homeless and in the absence of shelter are likely to be living in an unsheltered setting.
- Individuals and families vulnerable to injury or illness if not sheltered.
Transgender placement will be based on gender self-identification.

Discharge and Length of Stay

Program participants shall be discharged from Emergency Shelter services when they choose to leave or when they have successfully obtained safe, permanent housing. Any Length of Stay limitations shall be determined by the individual service provider's policies and clearly communicated to program participants. Providers of shelter services are strongly encouraged not to discharge individuals and families who have not secured permanent housing and maintain those households in shelter until they can be placed in appropriate permanent housing.

Safety and Shelter Safeguards for Special Populations

Safety and Shelter Safeguards shall be determined by the individual Special Population service provider's policies and clearly communicated to program participants.

Street Outreach (SO) – ESG Only

Reference: [24 CFR 576.101](#) (ESG)

The San Antonio and Bexar County community has developed Street Outreach Written Standards of Care, which can be found in Addendum II (TBD).

Addendum I – Rapid Rehousing and Homeless Prevention Written Standards

The standards below are based on nationally recognized best practices¹ and developed through a series of community sessions focusing on developing local best practice in rapid rehousing and homelessness prevention implementation. The intent of developing local Rapid Rehousing (RRH) and Homelessness Prevention (HP) program standards is to ensure equal access and services are provided to all households enrolled in RRH and HP and to establish consistency in implementation at every agency.

The San Antonio and Bexar County Rapid Rehousing and Homelessness Prevention (including all ESG/ESG-CV funded Prevention) agencies are expected to adhere to these standards for delivering assistance in addition to all federal requirements² applicable to the funding source, unless otherwise indicated.

Program Philosophy & Design	Additional Clarifications, as needed
P1. Program uses the standards included in this document (or other similar standards that meet the same intent) as the basis for training and supervising staff.	
<p>P2. Program accepts all referrals through Homelink, as the local coordinated entry process.</p> <p>P2a. Programs adhere to Homelink Referral Partner Expectations</p> <p>P2b. Homelessness Prevention Programs coordinate referrals through the CoC Prevention Subcommittee and local Targeted Prevention Framework</p>	<p>This may not apply to non-federally funded or victim service provider projects. If not applicable, the program should have clearly defined written criteria and procedures to prioritize applicants.</p> <p>Homelink Policies and Procedures are available on the SARAH website</p>

¹ Adapted from the standards published by the National Alliance to End Homelessness (NAEH) in 2016 to guide implementation of rapid rehousing best practices.

² Depending on the funding source, federal requirements may include the Continuum of Care Program Interim Rule, the Emergency Solutions Grant Interim Rule, the ESG-CV Notice CPD-21-08, and other applicable regulations as issued by HUD CPD.

<p>P3. Program staff are trained on the principles of Supportive Housing and oriented to the basic program philosophy of prevention, rapid rehousing, and Housing First.</p> <p>Program has a routine way of onboarding new staff that includes training on Housing First and the prevention and rapid rehousing principles including trauma-informed care, motivational interviewing, and a strengths-based approach.</p>	<p>Housing First is defined as a homeless assistance approach that prioritizes providing permanent housing to someone experiencing homelessness, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life.</p> <p>Housing First implementation includes offering a robust package of services & case management to support individual needs and to address housing barriers</p>
<p>P4. Eligibility and screening criteria for the program does not create additional barriers to housing and does not include preconditions to enrollment, services, or housing placement, such as a period of sobriety, a commitment to participation in treatment, or any other criteria designed to “predict” long-term housing stability other than willingness to engage the program and work on a self-directed housing plan. Programs will limit eligibility and screening criteria to that required by funders.</p> <p>Households are not required to have any specific identification documents to be enrolled in HP or RRH. Programs understand that project enrollment encompasses the housing search process (when necessary, for HP) to assist a household in obtaining documents needed to enter a lease for their housing unit.</p>	<p>Projects are allowed to identify specific target populations but must comply with fair housing laws.</p>
<p>P5. Disabilities are assessed only to the extent critical to providing needed and relevant services and when related to the participant’s ability to obtain a disability-specific benefit, service, or accessible unit</p>	

<p>P6. Leases for program participants are legally binding, written or verbal leases between the program participant and property owner. Leases are subject to local and state residential landlord-tenant laws and additional requirements, such as drug testing or program participation, are not allowed.</p>	<p>While written leases often supersede any other written or verbal correspondence between a tenant and property owner in Texas, programs are encouraged to keep record of all written documentation between a program participant and property owner.</p>
<p>P7. Program participates in the local community's Homeless Management Information System (HMIS) meaning they collect all required data standards (as determined by HUD and local HMIS policies), adhere to privacy standards, take steps to ensure timely and quality data entry, and participate in all required reporting.</p>	<p>Victim service providers should follow the same standard for tracking data in a comparable database.</p>
<p>P8. Program has an ongoing performance improvement process that includes evaluation of participant outcomes and participant feedback. The performance benchmarks and standards in this document provide a framework for performance evaluation and performance improvement efforts.</p>	<p>Programs should include project scorecard metrics from their funder in their ongoing performance improvement process. Additionally, the NAEH benchmarks can be used as a guide.</p>
<p>P9. Program and case management staff fully embrace and operationalize a strengths-based approach in working with each participant. Because Permanent Supportive Housing is a very limited resource, AND because of the trauma of experiencing homelessness and the scarcity of all homeless interventions, RRH and HP programs operate with a belief that all households will thrive in housing, regardless of income and acuity, and if additional resources, beyond rental assistance and case management are needed, the program will work to identify additional supports.</p>	<p>Program can follow local procedures for making referrals to SAHA or Permanent Supportive Housing.</p>
<p>P10. Program has established practices of authentic youth collaboration in project design and implementation.</p>	<p>Fully meet standard for YHDP-funded RRH projects.</p>

<p>P11. Program adheres to all applicable funding requirements without setting additional restrictive policies or procedures.</p> <p>P11a. Offer assistance as long as a participant is identified to need it and for a maximum period of time as determined by the funding source.</p> <p>P11b. Program does not require a minimum level of assistance.</p> <p>P11c. Some funding sources allow for services to continue after rental assistance ends. Programs will document in writing how it is determined if a participant is eligible for aftercare services and what level of engagement will be provided</p>	<p>Projects are required to have processes in place to determine how much and how long someone needs assistance. Refer to Case Management and Rent & Move-In Assistance standards to better understand local standards.</p>
<p>P12. Termination of HP and RRH participants will only be used in extenuating circumstances and should only be considered after other remedies have been attempted.</p>	<p>Evictions and efforts to meet program targets/metrics are not grounds for terminating a participant from a RRH or HP program.</p>
<p>Housing Identification</p>	<p>Additional Clarifications, as needed</p>
<p>H1. Program has designated staff whose responsibility is to identify and recruit landlords and encourage them to rent to households served by the program. Staff have the knowledge, skills, and agency resources to understand landlords’ perspectives, understand landlord and tenant rights and responsibilities, and negotiate landlord supports. If a program does not have a dedicated staff person(s) who solely performs this function, case manager job descriptions must include responsibilities including landlord recruitment and negotiation and at least some of the program’s case managers must be trained in this specialized skill set to perform the recruitment function effectively.</p>	<p>Not all HP households will present a need for housing relocation, though all programs are required to meet this standard in order to meet the needs of households who are in need of identifying new housing in order to obtain housing stability.</p>

<p>H2. Staff are trained on housing identification, landlord tenant rights and responsibilities, and other core competencies as well as the wider array of housing assistance available within a community.</p> <p>Program has routine ways to onboard new staff and to keep staff regularly updated on new strategies, policies, and housing assistance options in the community.</p>	
<p>H3. Program has written policies and procedures for landlord recruitment activities, including screening out potential landlord partners who have a history of poor compliance with their legal responsibilities and fair housing practices.</p>	<p>At a minimum, agencies need to be able to describe landlord recruitment but move towards written policy and procedures for RRH and HP.</p>
<p>H4. Program offers a standard, basic level of support to all landlords who lease to program participants and this support is detailed in a written policy distributed to landlords. Program can negotiate additional supports, as needed, on a case-by-case basis.</p> <p>At a minimum, this policy specifies that program staff:</p> <p>H4a. Respond quickly (within one business day) to landlord calls about tenancy problems.</p> <p>H4b. Seek to resolve conflicts around lease requirements, complaints by other tenants, and timely rent payments; and</p> <p>H4c. Whenever possible, negotiate move-out terms and assist the person/household to quickly locate and move into another unit without an eviction (see Case Management & Services Standard C15.)</p>	<p>.</p>
<p>H5. Program has a detailed policy for the type of assistance provided to help households find and secure housing. Staff explain and distribute this policy to households at entry to the program.</p> <p>Some households may decline assistance in finding housing, but the program checks on their progress and offers advice and/or direct assistance if they encounter obstacles they cannot resolve independently.</p>	<p>Policies provided to households should be easily accessible and easy to read/understand.</p>

<p>H6. Program has a written policy requiring staff to explain to participants basic landlord-tenant rights and responsibilities and the requirements of their specific lease.</p>	
<p>H7. Program continually engages in the recruitment and retention of landlord partners and has methods of tracking landlord partners and unit vacancies, unit locations, characteristics, and costs.</p>	
<p>H8. Program provides participants with multiple housing choices within financial constraints. The onus is on the program to provide these housing choices, but this does not preclude program participants from conducting their own search and choosing housing they identify independently.</p>	
<p>H9. Program assists participants in making an informed housing choice with the goal that the participant will be able to maintain after program exit, even when the household will experience high housing cost burden. While participants ultimately choose their housing unit, a program uses housing and budgeting plans that help a participant understand the likelihood of being able to pay rent and meet the requirements of the lease by the end of assistance.</p> <p>This should not preclude the program from assisting households with little or no income from moving into housing.</p> <p>For extremely low income households, there should be reasonable projections and expectations and due diligence on the program’s part to help participants secure income (through employment, public benefits, and/or on-going rental assistance) at program exit (see Case Management & Services Standards).</p>	
<p>H10. Program trains staff to collaborate with outreach and shelter case managers (or other providers, when available, in the case of HP assistance) to assist households with obtaining necessary documentation needed to sign a lease and move into housing.</p>	

<p>H11. When closing a case, the program provides information to landlords about how they can contact the program again if needed and what kind of follow-up assistance may be available.</p>	
<p style="text-align: center;">RENT & MOVE-IN ASSISTANCE</p>	<p style="text-align: center;">Additional Clarifications, as needed</p>
<p>R1. Program staff are trained on regulatory requirements of all applicable rapid rehousing and homelessness prevention funding streams and on the ethical use and application of a program’s financial assistance policies. This includes but is not limited to initial and ongoing eligibility criteria, program requirements, and assistance maximums.</p> <p>Program has a routine way to onboard new staff and to keep staff regularly updated on changing regulations, program policies, and required data collection and documentation.</p>	<p>CoC Program ESG Program ESG-CV Notice CPD-21-08 *Other regulations and flexibilities as issued by CPD</p>
<p>R2. A progressive approach is used to determine the duration and amount of rent assistance. Financial assistance is <u>not</u> a standard “package” (i.e. all households receive \$500/mo., or all households receive 6 months of assistance) and is flexible enough to adjust to households’ unique needs and resources, especially as participants’ financial circumstances or housing costs change.</p> <p>Policies and procedures also detail when and how rapid rehousing assistance is used as a bridge to a permanent subsidy or permanent supportive housing placement.</p>	<p>Not all households with high acuity and/or very low income will need a longer-term housing resource.</p>
<p>R3. Program has written policies & procedures that detail the progressive approach that include clear and fair decision guidelines and internal processes and procedures for reassessment for the continuation and amount of financial assistance.</p>	<p>Monthly rental assistance determinations must be documented and maintained as part of the participant file.</p>
<p>R3a. Guidelines should include an understanding that participants are not required to pay a portion of their rent, but programs are required to assess and determine the need and amount of rental assistance monthly.</p> <p>R3b. Guidelines are flexible enough to respond to the varied and changing needs of program participants, including participants with zero income.</p>	<p>Re-evaluations for continued assistance should follow relevant funding requirements.</p>

<p>R3c. Staff is trained on how to effectively have budgeting conversations and to complete a budgeting worksheet and these skills are used in monthly rental determination conversations with participants</p>	
<p>R4. Programs should expect to pay 100% of move-in expenses + 100% of the first month of rent for all participants. Eligible expenses are dependent specific to each funding source and each program is responsible for ensuring that only eligible costs are provided.</p>	<p>If a project does not pay this amount, justification should be documented as to why payment was reduced.</p> <p>In HP programs, only applicable to households needing relocation services.</p>
<p>R5. Program issues checks quickly and on time and has the capacity to track payments to landlords and other vendors, and the type of assistance provided.</p>	
<p>R6. Program has the capacity to pay reasonable back rent and utility arrears that directly prevent a participant from maintaining their housing or being able to sign a lease.</p>	<p>Required for ESG and ESG-CV funded programs.</p> <p>When these costs are not eligible through the federal funding source, programs should do their best to help meet the need through other resources/referrals.</p> <p>Refer to PLACE Program whenever possible</p>
<p>R7. Program has the capacity to offer landlord incentives as reasonable and necessary to quickly obtain housing.</p> <p>Landlord Incentives allowable under the ESG-CV Notice are limited to 3x the rent charged for each unit and include:</p> <ul style="list-style-type: none"> ● Signing bonuses equal to up to 2 months of rent; ● Security deposits equal to up to 3 months of rent; <p style="padding-left: 40px;">Paying the cost 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; and,</p> <ul style="list-style-type: none"> ● Paying the costs of extra cleaning or maintenance of a program participant’s unit or appliances. 	<p>Required for ESG-CV funded programs.</p> <p>When these costs are not eligible through the federal funding source, programs should do their best to help meet the need through other resources/referrals.</p> <p>Refer to PLACE Program whenever possible</p>

<p>R8. Program helps participants meet basic needs at enrollment and move-in, such as securing basic furnishings for an apartment, including mattresses and basic kitchen items such as a pot for cooking and utensils</p> <p>The purchase of furniture and household furnishings are allowable under the ESG-CV Notice; however, the items may only be provided for use while the participant is receiving assistance. These purchases are subject to the requirements for equipment at 2 CFR 200.313, including the disposition requirements included in paragraph (e) of that section.</p>	<p>Programs should follow Eligible Expenses guidelines when using federal funding to pay for household goods.</p> <p>In the event other funding streams are not available to cover costs, rehousing agencies should develop and maintain partnerships with other community organizations to meet household needs</p>
<p>R9. Program has written procedures that detail how participants are made aware of how much rent they are responsible for paying each month.</p>	<p>Notification to participants is still required even if their rental contribution is \$0.</p>
<p>R10. The transition off of financial assistance is coordinated with case management efforts to assist program participants to assume and sustain their housing costs</p>	
<p>Case Management & Services</p>	<p>Additional Clarifications, as needed</p>
<p>C1. Case managers' job descriptions direct case managersto focus on housing and to use strengths-based practicesfocused on participant engagement and meeting the unique needs of each household.</p>	
<p>C2. In programs that have specialized staff that conduct housing location (see Housing Identification Program Standard H1.), case managers work closely with housing locator staff to match the client to an appropriate unit as quickly as possible.</p> <p>When housing location is not a specialized role, case manager job descriptions shall include the role and requirements of housing location.</p>	

<p>C3. Case managers are trained on homelessness prevention and rapid rehousing case management strategies and related evidence-based practices as well as program policies and community resources.</p> <p>C3a. Strategies include but are not limited to: Trauma Informed Care, Positive Youth Development, Motivational Interviewing, Harm Reduction, and using a Strengths Based Approach.</p> <p>Additionally, a program has a regular process for onboarding new staff and regularly updating the training of current staff.</p>	<p>Positive Youth Development training and practices are applicable for all RRH and HP projects serving any youth under the age of 25 and required in all YHDP funded projects.</p>
<p>C4. Except where dictated by the funder, program participants direct when, where, and how often case management meetings occur. Meetings occur in a participant’s home and/or in a location of the participant’s choosing whenever possible.</p>	<p>Program should follow CDC and agency guidance before engaging in in-person meetings with participants during a pandemic.</p> <p>Resource: Engaging Clients with Remote Case Management</p>
<p>C5. Case managers respect a program participant’s home as their own, scheduling appointments ahead of time, only entering when invited in, and respecting the program participant’s personal property and wishes while in their home.</p>	<p>Program should follow CDC and agency guidance before engaging in in-person meetings with participants during a pandemic.</p>
<p>C6. Case management and services are offered regularly and at least monthly. Services are designed to meet the needs and wants of each participant and participation is voluntary.</p> <p>C6a. If a participant is unable to be reached, the case manager should continue attempts to engage with them and document their attempts. A household should not be terminated from the project if they are unreachable for a period of time.</p> <p>C6b. If a program participant refuses services, they should not be terminated from the program. Case managers should try to engage the participant in respectful and creative ways, offering a service package that is inviting to the participants. Programs and case management staff should understand and respect that it could take time to develop trust with participants.</p>	<p>Case management and services will often be more frequent at the beginning of enrollment in the program. Especially while a participant is looking for housing and newly moved into a unit.</p>

<p>C7. Program has clear safety procedures for home visits that staff are trained on and that are posted clearly visible in office space and shared with program participants at intake and shared with participants and staff whenever changes are made.</p>	<p>Program should follow CDC and agency guidance before engaging in in-person meetings with participants during a pandemic.</p>
<p>C8. Program has clearly defined relationships with employment and income programs that it can connect program participants to when appropriate.</p>	
<p>C9. Program has clearly defined policies and objective standards for when case management should continue and end.</p> <p>C9a. These guidelines are flexible enough to respond to the varied and changing needs of program participants.</p> <p>C9b. These guidelines include review of the household file and situation from a program director or other staff member who is not directly connected to the household.</p>	
<p>C10. At enrollment or within 72 hours of enrollment, program conducts a tenancy barriers assessment— not for the purpose of screening out a participant, but to quickly address any such barriers, help direct and navigate the housing search and contribute to landlord negotiation efforts.</p> <p>Any other assessments completed prior to housing are limited and focus on those things necessary to support health and safety and resolve the housing crisis as quickly as possible.</p>	<p>Specific timeframes for establishing a housing plan may vary depending on capacity and processes. All programs should be striving to begin developing a housing plan with households as soon as possible following enrollment.</p>
<p>C11. Program has resources and/or ability to connect participants to community resources that help participants: resolve or navigate tenant problems (like rental and utility arrears or multiple evictions) that landlords may screen for on rental applications; obtain necessary documentation such as identification; prepare participants for successful tenancy by reviewing lease provisions, understanding their rights and responsibilities; and support other move-in activities such as providing furniture.</p> <p>C11a. Program, at a minimum, maintains a list of community resources (and their eligibility requirements) to which participants can be referred. Preferably, the program has relationships with these agencies. The list is regularly updated and includes other low-income housing assistance programs.</p>	<p>San Antonio and Bexar County rehousing agencies should utilize SACRD for a full directory of community resources.</p>

<p>C12. Program offers basic tenancy skills and learning opportunities which can include instruction or guidance on basic landlord-tenant rights and responsibilities, requirements and prohibitions of a lease, and meeting minimum expectations for care of the housing unit, such as not causing damage (See Housing Identification Program Standard H5).</p> <p>C12a. When appropriate, case managers work with participants to build their communication skills to better respond to or negotiate with a landlord. This might relate to repairs; an extension on a rent payment; or complaints against the tenant concerning noise, odors, trash, or the behavior of children or guests, for example.</p>	
<p>C13. Program staff work directly with the participant and landlord to resolve tenancy issues without threatening the participant’s tenancy. The issue might be failure to pay rent, not properly maintaining the unit, or disturbing the quiet enjoyment of others. It also may include landlords not meeting their obligations.</p> <p>Program works quickly to identify a corrective course of action, and, without breaking a participant’s confidentiality, keep the landlord and participant informed about the program’s action to mitigate the situation.</p>	
<p>C14. When necessary, case managers help participants avoid evictions before they happen, and maintain a positive relationship with the landlord. This can be done by moving a household into a different unit prior to eviction and possibly identifying a new tenant household for the unit (See Housing Identification Program Standard H4c).</p> <p>C14a. If a household is evicted while in a RRH or HP project, the household may not be terminated from the program. The program is responsible for rehousing the household in a new permanent housing location.</p>	

<p>C15. Housing plans, sometimes known as case plans or goal plans, focus on how program participants can maintain a lease and address barriers to housing retention, including maximizing their ability to pay rent; improving understanding of landlord/tenant rights and responsibilities; and addressing other issues that have, in the past, resulted in housing crisis or housing loss.</p> <p>Plans account for participant preferences/choices, and include only goals created with and agreed to by the participant.</p>	
<p>C16. Case managers make referrals to appropriate community and mainstream resources, including, but not limited to income supplements/benefits (TANF, Food Stamps/SNAP, etc.), non-cash supports (healthcare, food supports, etc.), legal assistance, credit counseling, and subsidized child care.</p> <p>When making these referrals, it is the case manager’s responsibility to follow-up on receipt of assistance. However, a participant may choose not to follow up on or participate in any referred services or programs without fear of being terminated from the program.</p>	
<p>C17. As rapid rehousing and homelessness prevention assistance is short- or medium-term, case managers pay attention to participants’ incomes moving forward. Case managers help participants review their budgets, including income and spending, to make decisions about reducing expenses and increasing income.</p> <p>Case managers are knowledgeable about options to increase income including benefit enrollment, gaining employment, and increasing employment.</p>	
<p>C18. Case managers actively work with participants to identify pathways for increasing earned income, including participating in mainstream and community employment support programs as well as using a program’s own employer connections.</p>	

<p>C19. If necessary, case managers assist participants in identifying existing familial and personal connections that can help them maintain housing by providing supports such as childcare, transportation, etc.</p> <p>Participants may choose not to engage in this process without fear of being terminated from the program.</p>	
<p>C20. When getting close to closing a case, case managers should begin talking to participants about what things will be like when the RRH and HP assistance ends. This should be implemented as a brainstorm around what they want to accomplish while they still have the assistance and how the case manager can make sure they are ready for exit.</p> <p>Case management services may be provided beyond the point of financial assistance and should only continue to the extent necessary to ensure housing stability at the time of program exit.</p>	
<p>C21. When closing a case, case managers are responsible for ensuring that all appropriate referrals have been made and information on available community assistance has been shared with a participant.</p> <p>When closing a case, case managers provide information to participants about how they can access assistance from the program again if needed and what kind of follow-up assistance may be available. In instances when a participant</p>	
<p>is at imminent risk of returning to homelessness, program has the capacity to either directly intervene or provide referral to another resource.</p>	
<p>C22. When a referral to on-going supports is made while a case is open or in the process of closing, case managers provide a “warm handoff” and follow up, to assure that assistance is satisfactory</p>	

Addendum II – Street Outreach Written Standards

TBD

Addendum III – Emergency Solutions Grant (ESG) - CV Funds

These community written standards are in accordance with requirements outlined in [24 CFR 576.400](#).

The Coronavirus Aid, Relief, and Economic Security Act (CARES Act) provided an additional \$3.96 billion for the Emergency Solutions Grant (ESG) program. These funds were allocated to states, counties, and cities using a formula. Recipients and subrecipients must use these funds, known as ESG-CV funds, to prevent, prepare for, and respond to coronavirus among individuals and families who are homeless or receiving homeless assistance. Recipients and subrecipients can also use them to support additional homeless assistance and homelessness prevention activities to mitigate the impacts created by coronavirus.

ESG-CV mostly aligns with the [ESG federal regulations](#). However, HUD Notice CPD-21-08, superceding the prior Notice CPD-20-08, outlines additional requirements, limitations, and flexibilities. In turn, COCs must update local written standards to align with ESG-CV regulations. These ESG-CV specific written standards are an addendum to the existing written standards and are applicable to all agencies operating ESG-CV funded projects in San Antonio/Bexar County. They should be reviewed in conjunction with the local written standards; however, for ESG-CV projects, this addendum supersedes all other community standards.

The local ESG-CV recipients are the City of San Antonio and Bexar County. Additionally, SARAH helps coordinate State TDHCA ESG-CV funding. Any organization receiving ESG-CV funds from one or more of these sources is considered a subrecipient of ESG-CV funds and must abide by the following standards.

Coordinated Entry

Updated Policies and Procedures

In coordination with the local health department, the COC has updated Homelink assessment and prioritization policies to include COVID-19 vulnerabilities. The COC will use these policies for housing placement during the pandemic. The policies are available [here](#) and the Coordinated Entry (CE) Advisory committee will review them regularly. Community partners are invited to attend CE Advisory Committee meetings to provide specific feedback on Homelink processes.

SARAH staff will communicate updates that the Coordinated Entry and Outreach Advisory Committee recommends and the CoC Board of Directors approves.

Homelessness Prevention Referrals

SARAH, City of San Antonio Neighborhood Housing and Stabilization Dept. (NHSD), COSA DHS, and current prevention providers established a targeted prevention framework to ensure households most at risk of experiencing homelessness can access ESG-CV resources.

1. Housing Problem Solving & Diversion

ESG-CV prevention providers must be trained on Housing Problem Solving strategies through SARAH's Diversion Program. This training equips triage staff and intake workers to have deep problem-solving conversations that keep people from entering homelessness.

SARAH also manages a pool of funding that can cover expenses ineligible under federal funding.

Providers should contact EboniJett@sarahomeless.org for more information on Housing Problem Solving and Diversion.

2. Targeted Screening Tool³

The community is utilizing a local screening tool and process that ensures households are matched to the appropriate service in the community and that services reach the most vulnerable populations.

Rapid Rehousing Referrals

SARAH staff operating Homelink will make RRH referrals in accordance with policies and procedures linked above.

Emergency Shelter

Emergency Shelters play a key role in our local response to COVID-19. Shelters must follow CDC and local health department guidance, including social distancing requirements, to keep clients and staff safe.

If any ESG-funded shelter is considering closing or suspending intake they must notify SARAH, the City of San Antonio Dept. of Human Services, Bexar County, and emergency management officials before acting.

Intake Procedures

If emergency shelters need to adjust their intake procedures, they must ensure that the changes are consistent with need to prevent, prepare for, and respond to COVID-19. Since virus rates are in constant flux, shelters can shift their intake procedures without approval from any CoC committee but must make the City of San Antonio Department of Human Services (COSA DHS), Bexar County, SARAH and CentroMed aware of changes as quickly as possible.

Any changes to intake procedures or major shelter operations must be shared on the weekly community COVID-19 call facilitated by SARAH. SARAH will ensure the full community is aware of shelter changes.

Anyone who presents at an ESG-funded shelter with respiratory symptoms (e.g., cough) must not be turned away solely because of their health symptoms. Shelters funded by ESG-CV must establish referral pathways to isolation and quarantine.

Non-Congregate Shelter

³ The Targeted Prevention Screening Tool is was adopted in May 2021.

Haven for Hope is managing the community's non-congregate shelter (NCS) in the form of hotel stays and maintains procedural documents for this operation. The City of San Antonio funds this operation.

Capacity

Shelters funded by ESG-CV must minimize the number of people who are turned away when seeking shelter.

The City of San Antonio's Homeless Hotline will assist in coordinating referrals to emergency shelter. If a shelter is at maximum capacity, they must establish referral pathways to other housing or shelter services.

Lengths of Stay

While congregate facilities can pose higher risk for contracting COVID-19, shelters funded by ESG-CV must not implement a maximum length of stay when a discharge will result in participants returning to unsheltered settings or situations putting them at even higher risk of COVID-19 infection. Shelters must help clients think about their health risks while staying in shelter and when exiting to another situation.

Street Outreach

HUD has approved the following as eligible costs under Street Outreach for ESG-CV funded projects:

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

Projects administering ESG CARES funding are also expected to:

- Provide support to the City of San Antonio's Homeless Connections Hotline
- Participate in bi-weekly Street Outreach Case Conferencing
- Provide support at COSA Homeless Resource Hubs as needed

Providers must maintain social distancing requirements during engagements. Street outreach services, and services that outreach workers refer clients to, should be low-barrier.

Rapid Rehousing and Homelessness Prevention

Rapid Rehousing Eligibility

Agencies may use ESG-CV funds to provide housing relocation and stabilization services and rental assistance as necessary to help a homeless individual or family move as quickly as possible into permanent housing and achieve housing stability. This assistance, referred to as rapid rehousing, may be provided to program participants who meet the criteria under paragraph (1) of the “homeless” definition in 24 CFR 576.2 or who meet the criteria under paragraph (4) of the “homeless” definition and live in an emergency shelter or other place described in paragraph (1) of the “homeless” definition. The rapid rehousing assistance must be provided in accordance with the RRH-HP Program Standards, housing relocation and stabilization services requirements in §576.105, and the short- and medium-term rental assistance requirements in 24 CFR 576.106.

Homelessness Prevention Eligibility & Re-Evaluation Schedule

Sub-recipients may use ESG-CV funds to provide housing relocation and stabilization services and rental assistance to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the “homeless” definition in 24 CFR 576.2. Sub-recipients may provide this assistance, referred to as homelessness prevention, to individuals and families who meet the criteria under the “at risk of homelessness” definition, or who meet the criteria in the “homeless” definition at 24 CFR 576.2 and have an annual income below 50 percent⁴ of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant’s current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the RRH-HP Program Standards, housing relocation and stabilization services requirements in 24 CFR 576.105, and the short- and medium-term rental assistance requirements in 24 CFR 576.106.

Providers must re-evaluate clients’ level of rental assistance at least every 6 months.⁵

Housing Relocation & Stabilization Services (24 CFR 576.105)

ESG-CV funded projects are required to offer services that meet the needs of people enrolled in the project. Projects must offer a variety of services that are tailored to meet the needs of each individual client. Services must address housing and income barriers of the client and be designed to support the client in maintaining housing stability once their stay in the project has ended.

⁴ This is a change from the annual allocation of ESG funds which determined eligibility at 30% AMI. Subrecipients operating both ESG-CV and annual ESG funded projects must be diligent in their internal processes, to ensure compliance between the two funding sources.

⁵ This is a change from the annual allocation of ESG funds which requires re-evaluation every 3 months. Subrecipients operating both ESG-CV and annual ESG funded projects must be diligent in their internal processes, to ensure compliance between the two funding sources.

1. Participation Requirements

While projects are required to offer services, the ESG-CV notice prohibits projects from requiring clients to participate in case management services, receive treatment, or perform other activities.

If a project enrolls a client who is refusing services, the service team must try to engage the client in a variety of ways. Reaching out in different ways, including by text, phone, in person (if it can be done safely and by following social distancing requirements), or other ways can help to create a connection that could lead to service participation. The service team should regularly try to connect and not assume that a client will never want services just because they refused at the last attempt.

Participants may not be terminated from a project for non-participation in services. ESG-CV projects must document their due-diligence in offering services to a client who refuses participation.

Rental Assistance (24 CFR 576.106)

Clients assisted with rental assistance may receive:

- Short-term rental assistance, which is assistance for up to 3 months of rent.
- Medium-term rental assistance, which is assistance for more than 3 months but not more than 12 months of rent.⁶

Due to the COVID-19 pandemic, many individuals and families are facing unemployment and loss of income/benefits. Case managers and service teams must look at every individual situation with a client and determine what level of assistance will support them in moving towards housing self-sufficiency.

1. FMR & Rent Reasonableness

The ESG-CV notices waive the requirement that unit rent must not exceed Fair Market Rent (FMR) [24 CFR 576.106(d)(1)]. ESG-CV projects are not required to document FMR, but projects must document that each rental unit meets rent reasonableness standards in accordance with 24 CFR 982.507.

2. Homelessness Prevention - Participant Payment of Rent

ESG-CV Homelessness Prevention projects are expected to serve eligible participants with zero income. Therefore, there is no rental payment requirement for households receiving financial assistance. While participants are not required to pay a portion of the rent, subrecipients must approach every client situation with an individualized response.

3. Rapid Rehousing – Participant Payment of Rent

ESG-CV Rapid Rehousing projects are expected to serve eligible participants with zero income and because of that, there is no rental payment requirement for households receiving

⁶ The initial ESG-CV Notice limited medium-term rental assistance to 12 months. The limitation was removed in the ESG-CV Notice CPD-21-08.

financial assistance. While participants are not required to pay a portion of the rent, subrecipients must approach every client situation with an individualized response.

ESG-CV Additional Eligible Expenses

The ESG-CV notice allows for additional eligible expenses as outlined below.

Hazard Pay

ESG-CV funds may be used to pay hazard pay for project staff working directly to prevent, prepare, and respond to COVID-19 within the homeless response system. Examples of staff who would fall into this category are: emergency shelter intake staff, street outreach staff, emergency shelter maintenance staff, emergency shelter security staff, staff providing essential services directly to people experiencing homelessness, and other staff in proximity to persons with COVID-19 or working in a location with high likelihood of contracting COVID-19.

Volunteer Incentives

ESG-CV funds can be used under 24 CFR 576.101(a), 24 CFR 576.102(a)(1), and 24 CFR 105(b) for the cost of providing reasonable incentives to volunteers (e.g. cash or gift cards) who have been or are currently helping to provide necessary street outreach, emergency shelter, essential services, and housing relocation and stabilization services during the COVID-19 outbreak.

Projects are responsible for determining and documenting reasonable incentives for volunteer services provided.

Training⁷

ESG-CV funds may be used for training on infectious disease prevention and mitigation for staff working directly to prevent, prepare for, and respond to COVID-19 in the homeless response system.

Landlord Incentives

ESG-CV funds may be used under 24 CFR 576.105 to pay for landlord incentives that are reasonable and necessary to obtain housing for individuals and families experiencing homelessness and at risk of homelessness. Landlord incentives may not exceed three times the rent charged for the unit. Eligible landlord incentives include:

- Signing bonuses equal to 2 months of rent
- Security deposits equal to up to three months of rent, or the state statute

⁷ Training costs are considered a standalone activity and are not to be charged to an activity under 24 CFR 576.101 – 24 CFR 576.109.

- 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

Homeless Management Information System (HMIS) Lead Activities

ESG-CV recipients may pay for HMIS Lead activities as specified in 24 CFR 576.07(a)(2) even when the activities are not completed by the CoC's designated HMIS Lead. This flexibility allows for recipients to pay for HMIS costs beyond where they are related to collecting data on ESG program participants and ESG program activities to the extent they are necessary to help the geographic area prevent, prepare for, and respond to coronavirus.

Supporting Hygiene in Outdoor locations for People Experiencing Homelessness

To help prevent the spread of coronavirus, ESG-CV funds can be used for Street Outreach under 24 CFR 576.101(a) and for Emergency Shelter Operations under 24 CFR 576.102 for installing and maintaining the following:

- Port-o-lets or restrooms with hand-washing capabilities
- Hand washing stations with soap and water
- Clean drinking water spigots for filling containers
- Shower trucks with soap and shampoo

Sponsor-Based Rental Assistance

Sponsor-based Rental Assistance may be funded as an alternative to tenant-based rental assistance to re-house participants quickly in permanent housing where landlords might not otherwise be willing to rent to them. The recipient or subrecipient must execute a sponsor-based rental assistance agreement with a separate government agency, instrumentality, or nonprofit organization ("sponsor") to subsidize the rent of program participants who are referred to be housed in units owned or leased by the sponsor. See complete list of requirements for Sponsor-Based Rental Assistance in the [ESG-CV Notice CPD-21-08](#) pages 23-24.

Renter's Insurance

Funding for renter's insurance for RRH and HP program participants is allowable as long as it is necessary to obtain/maintain housing. Payment must be made directly to the insurance company on behalf of the program participant.

Laundry Services

Outreach funds may be used to provide laundry services.

Furniture and Household Furnishings

RRH and HP funds may be used to buy furniture and household furnishings for participant use **while they are receiving assistance**. If funds are used to purchase household furnishings, they will be subject to the requirements for equipment at 24 CFR 200.313, including the disposition requirements included in paragraph (e) of that section.

Essential Services

Services available to those receiving RRH or HP assistance are expanded to include all listed at 24 CFR 576.102(a)(1).

Personal Protective Equipment (PPE)

Purchase of PPE (e.g. masks, hand sanitizer, etc.) for program participants as an essential service under ES and SO and for program participants receiving RRH and HP.

Centralized/Coordinated Assessment

Additional costs to update/enhance/operate a coordinated entry system under 24 CFR 576.400(d). Documentation must show the use of funds is limited to an increase in system costs due to coronavirus. Recipient use of funds must be coordinated with the CoC.

Expanded Use of Cell Phones and Internet

Costs to provide temporary cell phones and service plans for participants of RRH (CoC, YHDP, ESG), HP (ESG), or residing in PSH (CoC or YHDP). Cell phones must be owned by the recipient/subrecipient and loaned to participants. Wireless service plans must be the recipient's/subrecipient's.

Duplication of Benefits

"Duplication of benefits" occurs when federal financial assistance is provided to a person or entity through a program to address losses resulting from a federally-declared emergency or disaster, and the person or entity receives or would receive financial assistance for the same costs from any other source, and the total amount received exceeds the total need for those costs. Recipients must establish and maintain adequate procedures to prevent any duplication of benefits with ESG-CV funds.

Resources

All subrecipients must be familiar with the following ESG, ESG-CV, and COVID-19 Documents:

- [ESG Federal Regulations](#)
- [ESG-CV HUD Notice CPD-21-08](#)
- [HUD Exchange - Disease Risk and Homelessness](#)

Appendix A: Policy and Procedures Checklist

Note: Please refer to Rapid Rehousing and Homeless Prevention Standards in the addendum for more information specific to these project types.

Shelter and Housing Projects

- Conflict of interest
- Homeless participation
- Faith-based activity
- Nondiscrimination, equal opportunity, and affirmative outreach
- Uniform administrative rules
- Program participant records are kept secure and confidential
- Participation in HMIS or comparable database
- Homeless status
- At risk of homelessness status
- Determination of ineligibility
- Annual income
- Program participant records
- Centralized or coordinated assessment systems and procedures
- Rental assistance agreements and payments
- Environmental review
- Lobbying and disclosure
- Displacement, relocation, and acquisition
- Procurement
- Utility allowance
- Emergency shelter facilities
- Services and assistance provided
- Coordination with CoCs and other programs
- Matching
- Financial records
- Subrecipients and contractors
- Period of record retention
- Access to records
- Reports

ESG Program Participation Records

- Evidence of homeless status or at risk of homelessness status, as applicable
- The services and assistance provided to the program participant including, as applicable, the security deposit, rental assistance, and utility payments
- Compliance with applicable requirements for providing services to that program participant under the program components and eligible activities

- Compliance with applicable requirements for providing services to that program participant under the provision on determining eligibility and the amount and type of assistance.
- Compliance with applicable requirements for providing services to that program participant under the provision on using appropriate assistance and services.

Case Management

- Notes verifying case management services were provided at least monthly, unless exempt from this requirement
- Notes verifying program participant's eligibility was re-evaluated at least every 3 months for homelessness prevention services or at least annually for rapid rehousing services
- Notes verifying program participant was assisted to obtain necessary mainstream and other resources
- Notes documenting reported changes in the program participant

Eligibility Requirements

- A copy of the CoC-approved coordinated assessment of the program participant and recording that information in HMIS
- Determination and verification/certification that the program participant was eligible for the services and/or financial assistance
- Determination and verification/certification of the program participant's homeless or at risk of homelessness status
- Determination and verification/certification that the program participant lacked sufficient resources and support networks to obtain the assistance from other sources.
- Determination and verification/certification that the program participant met income requirements, as applicable, and that an effort was made to obtain source documents or written third-party verification, when possible and applicable. This includes annual documentation of income for each program participant who receives housing assistance where rent or an occupancy charge is paid by the program participant.
- When applicable, determination that individual or family was ineligible for ESG assistance, which should include the reason for that determination in sufficient detail that the logic behind determination is clear.
- For CoC funded projects, acceptable evidence of homeless status.

Financial Assistance Information Requirements

- Identification of the specific services and financial assistance amounts that were provided to the program participant
- Copies of written leases and rental agreements, documentation of payments made, including dates of occupancy, and compliance with fair market rent, rent reasonableness and utility allowance requirements
- Determination and verification that the housing unit met HUD's habitability and lead- based paint standards

Housing Relocation & Stabilization Requirements



- When applicable, verification that the services were terminated.
- Copy of individualized housing stability plan
- For CoC funded projects, acceptable evidence of homeless status.

Permanent Supportive Housing (PSH) Only Requirements

- Determination and verification/certification that the only households served through permanent supportive housing dedicated for chronically homeless individuals and families meet the definition of chronic homelessness
- Units that are prioritized for the chronically homeless must maintain documentation that: the participant met the definition of chronic homeless on program entry or that there were not eligible chronically homeless participants at the time of project vacancy and this can be documented by the Coordinated Entry System
- Determination and verification/certification that the only households served through permanent supportive housing meet HUD's requirements of having a family member be a person with disabilities

Homelessness Prevention (HP) Only Requirements

- Determination and verification/certification that the program participant met the criteria for being Homeless or At-Risk of Homelessness and that an effort was made to obtain written third-party verification, when possible and applicable

Rapid Rehousing (RRH) Only Requirements

- Determination and verification/certification that the program participant met the criteria for being Category 1 or Category 4 Homeless (as long as the individuals/families fleeing or attempting to flee DV are also literally homeless) and that an effort was made to obtain written third-party verification, when possible and applicable

Financial Records Requirements

- Supporting documentation for all costs charged to ESG or CoC grant
- Documentation showing ESG or CoC funds were spent on allowable costs in accordance with the requirements for eligible activities and costs principles
- Time sheets and time allocation for all personnel paid for with CoC and/or ESG funding
- Documentation of the receipt and use of program income
- Documentation of the receipt and use of matching funds
- Copies of procurement contracts

Appendix B: Training and Resource Tool

This tool is for CoC and ESG funders and recipients to provide resources and assist with monitoring. This tool will be updated as new resources become available.

Training and Resource List for All CoC and ESG Programs

If CoC funded:

- [CoC Program Interim Rule](#)
- [24 CFR 578](#)

If ESG funded:

- [ESG Program Interim Rule](#)
- [24 CFR 576](#)

Both CoC and ESG funded:

- [HUD Virtual Binders](#)
- [Homeless Management Information System \(HMIS\) Policies and Procedures](#)
- [Coordinated Entry System \(Homelink\) Policies and Procedures](#)
- [Authentic Homeless Participation](#)
- Housing First [Principles](#) and [Checklist](#)
- [Equal Access Agency Assessment Tool](#)
- [Equal Access Expectations: Training Scenarios for Use with Project Staff](#)

Appendix C: Emergency Transfer Plan

Model Emergency Transfer Plan for Victims of Domestic Violence, Dating Violence, Sexual Assault, or Stalking

EMERGENCY TRANSFERS:

[Insert name of covered housing provider (acronym HP for purposes of this model plan)] is concerned about the safety of its tenants, and such concern extends to tenants who are victims of domestic violence, dating violence, sexual assault, or stalking. In accordance with the Violence Against Women Act (VAWA),⁸ HP allows tenants who are victims of domestic violence, dating violence, sexual assault, or stalking to request an emergency transfer from the tenant's current unit to another unit. The ability to request a transfer is available regardless of sex, gender identity, or sexual orientation.⁹ The ability of HP to honor such request for tenants currently receiving assistance, however, may depend upon a preliminary determination that the tenant is or has been a victim of domestic violence, dating violence, sexual assault, or stalking, and on whether HP has another dwelling unit that is available and is safe to offer the tenant for temporary or more permanent occupancy. This plan identifies tenants who are eligible for an emergency transfer, the documentation needed to request an emergency transfer, confidentiality protections, how an emergency transfer may occur, and guidance to tenants on safety and security. This plan is based on a model emergency transfer plan published by the U.S. Department of Housing and Urban Development (HUD), the Federal agency that oversees that [insert name of program or rental assistance here] is in compliance with VAWA.

ELIGIBILITY FOR EMERGENCY TRANSFERS:

A tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking, as provided in HUD's regulations at 24 CFR part 5, subpart L is eligible for an emergency transfer, if: the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant remains within the same unit. If the tenant is a victim of sexual assault, the tenant may also be eligible to transfer if the sexual assault occurred on the premises within the 90-calendar-day period preceding a request for an emergency transfer. A tenant requesting an emergency transfer must expressly request the transfer in accordance with the procedures described in this plan. Tenants who are not in good

⁸ Despite the name of this law, VAWA protection is available to all victims of domestic violence, dating violence, sexual assault, and stalking, regardless of sex, gender identity, or sexual orientation.

⁹ Housing providers cannot discriminate on the basis of any protected characteristic, including race, color, national origin, religion, sex, familial status, disability, or age. HUD-assisted and HUD-insured housing must be made available to all otherwise eligible individuals regardless of actual or perceived sexual orientation, gender identity, or marital status.

standing may still request an emergency transfer if they meet the eligibility requirements in this section.

EMERGENCY TRANSFER REQUEST DOCUMENTATION:

To request an emergency transfer, the tenant shall notify HP’s management office and submit a written request for a transfer to [HP to insert location]. HP will provide reasonable accommodations to this policy for individuals with disabilities. The tenant’s written request for an emergency transfer should include either:

1. A statement expressing that the tenant reasonably believes that there is a threat of imminent harm from further violence if the tenant were to remain in the same dwelling unit assisted under HP’s program; OR
2. A statement that the tenant was a sexual assault victim and that the sexual assault occurred on the premises during the 90-calendar-day period preceding the tenant’s request for an emergency transfer.

CONFIDENTIALITY:

HP will keep confidential any information that the tenant submits in requesting an emergency transfer, and information about the emergency transfer, unless the tenant gives HP written permission to release the information on a time limited basis, or disclosure of the information is required by law or required for use in an eviction proceeding or hearing regarding termination of assistance from the covered program. This includes keeping confidential the new location of the dwelling unit of the tenant, if one is provided, from the person(s) that committed an act(s) of domestic violence, dating violence, sexual assault, or stalking against the tenant. See the Notice of Occupancy Rights under the Violence Against Women Act For All Tenants for more information about HP’s responsibility to maintain the confidentiality of information related to incidents of domestic violence, dating violence, sexual assault, or stalking.

EMERGENCY TRANSFER TIMING AND AVAILABILITY:

HP cannot guarantee that a transfer request will be approved or how long it will take to process a transfer request. HP will, however, act as quickly as possible to move a tenant who is a victim of domestic violence, dating violence, sexual assault, or stalking to another unit, subject to availability and safety of a unit. If a tenant reasonably believes a proposed transfer would not be safe, the tenant may request a transfer to a different unit. If a unit is available, the transferred tenant must agree to abide by the terms and conditions that govern occupancy in the unit to which the tenant has been transferred. HP may be unable to transfer a tenant to a particular unit if the tenant has not or cannot establish eligibility for that unit.

If HP has no safe and available units for which a tenant who needs an emergency is eligible, HP will assist the tenant in identifying other housing providers who may have safe and available units to which the tenant could move. At the tenant’s request, HP will also assist

tenants in contacting the local organizations offering assistance to victims of domestic violence, dating violence, sexual assault, or stalking that are attached to this plan.

SAFETY AND SECURITY OF TENANTS:

Pending processing of the transfer and the actual transfer, if it is approved and occurs, the tenant is urged to take all reasonable precautions to be safe.

Tenants who are or have been victims of domestic violence are encouraged to contact the National Domestic Violence Hotline at 1-800-799-7233, or a local domestic violence shelter, for assistance in creating a safety plan. For persons with hearing impairments, that hotline can be accessed by calling 1-800-787-3224 (TTY). Tenants who have been victims of sexual assault may call the Rape, Abuse & Incest National Network's National Sexual Assault Hotline at 800-656-HOPE or visit the online hotline at <https://ohl.rainn.org/online/>.

Tenants who are or have been victims of stalking seeking help may visit the National Center for Victims of Crime's Stalking Resource Center at <https://www.victimsofcrime.org/our-programs/stalking-resource-center>.