

**Homeless Continuum of Care of Stark County (HCCSC)
Emergency Solutions CARES Act COVID19 (ESG-CV)**

Policies Governing Eligibility and Prioritization to Receive Assistance and Standards for Administering Assistance

Purpose: Congress has provided \$4 billion for HUD’s ESG program for local governments to prevent, prepare for, and respond to coronavirus among individuals and families who are homeless, receiving homeless assistance, or are at risk of becoming homeless. The Homeless Continuum of Care of Stark County (HCCSC) has established emergency shelter and homeless prevention Policies Governing Eligibility and Prioritization to Receive Assistance and Standards for Administering Assistance for this funding opportunity that expires on September 30, 2022.

Section - I. Eligibility and Prioritization for Emergency Shelter Projects Receiving ESG-CV Funds

1. Eligibility for emergency shelter. To be eligible for emergency shelter offered by participating agencies, individuals and families must:
 - a) Be present in Stark County when requesting shelter;
 - b) Be a current or former resident of the City of Canton if referred to a shelter outside the City of Canton
 - c) Lack other nighttime shelter meant for human habitation, apart from a motel or hotel room paid for by a charitable organization or by a federal, state, or local government program for low-income individuals.¹

2. Prioritization for emergency shelter. The following rules will be followed in prioritizing households for emergency shelter:
 - a. Chronically Homeless. Chronically homeless individuals and families will be prioritized for shelter before those who are not chronically homeless.

 - b. Families with Minor Children. Families with minor children will be prioritized for available units at all family shelters.

 - c. Acuity of Need Among the chronically homeless as well as among those who are not chronically homeless, individuals and families with higher acuity of need will be served on a first-come, first-serve basis.

 - d. Veterans. Households with veterans will be served before households with equal acuity of need.

Section - II. Eligibility, Eligible Uses of Funds and Prioritization for Homeless Prevention Projects Receiving ESG-CV Funds * Projects receiving ESG-CV funds for Homeless Prevention must adhere to HUD’s Homeless System Response: ESG Homelessness Prevention Eligibility During Eviction Moratoria. Please see HUD guidance on the Starkcountyhomeless.org website. This applies to any applicable local, state or federal eviction moratoria.

1. Eligibility for homeless prevention. To be eligible for ESG-CV homelessness prevention services operated by participating agencies, individuals and families must:
 - a) Be residents of Stark County with 75% funding targeted towards the residents of the City of Canton;
 - b) Be ineligible for system diversion;
 - c) Meet Homeless Navigation Pre-Screen eligibility;
 - d) Have an annual income at or below 50% AMI²

¹ <https://www.hud.gov/sites/dfiles/CPD/documents/CPD-COVID-19-Waiver-3-Final-Clean.pdf> * An individual may qualify as homeless under paragraph (1)(iii)the homeless definition in 24 CFR 576.2 so long as he or she is exiting an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. This waiver is in effect until March 31, 2021.

² an individual or family who has an annual income that does not exceed the [Very Low-Income Limit of the area](#), as established for

**Homeless Continuum of Care of Stark County (HCCSC)
Emergency Solutions CARES Act COVID19 (ESG-CV)**

Policies Governing Eligibility and Prioritization to Receive Assistance and Standards for Administering Assistance

- e) Be able to regain stability in their current permanent housing or move into other permanent housing and achieve stability in that housing;
- f) At risk of homelessness,

AND meets one of the following conditions:

- a) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
- b) Is living in the home of another because of economic hardship;
- c) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
- d) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;
- e) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
- f) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- g) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
 - (i) OR who meet the criteria in paragraph (2), (3), or (4) of the "homeless" definition in §576.2 9 – (2) at imminent risk – within 14 days, (3) Unaccompanied youth under 25 years of age, or families with children and youth, who meet the homeless definition under other federal acts, or (4) fleeing or attempting to flee domestic violence, dating violence, sexual assault, stalking.

2. Eligible uses for homeless prevention response ESG-CV costs³

- a) Rental assistance for limit of 24 months in a three year period ⁻⁴ *HP extended for 6 months for households who reach max assistance from annual ESG between 1/21/2020 and 3/01/2021⁵
 - i. This assistance may be short-term rental assistance, medium-term rental assistance, payment of rental arrears, or any combination of this assistance. (1) Short-term rental assistance is assistance for up to 3 months of rent.(2) Medium-term rental assistance is assistance for more than 3 months but not more than 24 months of rent.(3) Payment of rental arrears consists of a one-time payment for up to 6 months of rent in arrears, including any late fees on those arrears.⁶
- b) Rental application fees
- c) Utility security deposits and payments (including arrears)
- d) Landlord incentives (incentives amount must not exceed three times the rent charged for the unit: signing bonuses equal to up to 2 months of rent; security deposits equal to up to 3 months of rent; paying the cost to repair damages incurred by the program participant not covered by the security deposit or that are

HUD's Section 8 and Public Housing programs at www.huduser.gov/portal/datasets/il.html

³ Recommended Uses for ESG CARES Act Costs based on guidance included in The Department of Housing and Urban Development's CARES Act Eligibility and Recommended Uses for States and Local Jurisdictions

⁴<https://www.govinfo.gov/content/pkg/CFR-2018-title24-vol3/xml/CFR-2018-title24-vol3-part576.xml#seqnum576.106>

⁵ https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-Grants-Management-ESG-CV-Notice-Summary.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=4fec7d25f-SNAPS-COVID-19-Digest-10-2-2020&utm_medium=email&utm_term=0_f32b935a5f-4fec7d25f-19411181

⁶ <https://www.govinfo.gov/content/pkg/CFR-2018-title24-vol3/xml/CFR-2018-title24-vol3-part576.xml#seqnum576.106>

**Homeless Continuum of Care of Stark County (HCCSC)
Emergency Solutions CARES Act COVID19 (ESG-CV)**

Policies Governing Eligibility and Prioritization to Receive Assistance and Standards for Administering Assistance

incurred while the program participant is still residing in the unit; and, paying the costs of extra cleaning or maintenance of a program participant's unit or appliances)⁷

- e) Housing search and placement
- f) Housing stability case management
- g) Landlord-tenant mediation
- h) Legal services must be necessary to obtain or retain Housing.
 - i. To be eligible under the ESG program, legal services established in 24 CFR 576.102(a)(1)(vi) and 24 CFR 576.105(b)(4) must be necessary to help program participants obtain housing or keep a program participant from losing housing where they currently reside.⁸
- i) Volunteer incentives
- j) Motels/hotels for isolation and/or social distancing⁹
 - i. Renting hotel or motel room directly or through a hotel or motel voucher;
 - ii. Cleaning of hotel or motel rooms used by program participants;
 - iii. Repairs for damage caused by program participants above normal wear and tear of the room
- k) Personal protective equipment for participants and staff
- l) Transportation to healthcare facilities and medical care coordination
- m) Hazard pay for staff providing services (e.g., outpatient health or mental health, housing navigators) and/or staff in proximity to persons with coronavirus or working in locations with a high likelihood of contracting coronavirus
- n) Credit repair

3. Prioritization for homeless prevention. The following rules will be followed in prioritizing households for prevention services:

- a) Prioritization for households with risk factors for contracting COVID-19. Households in which any member has two of the following risks factors (underlying medical condition(s), is 60 years of age or older and/or is a pregnant woman) will be prioritized before households with one risk factor. Household that have one risk factor (underlying medical condition(s), is 60 years of age or older or is a pregnant woman) will be prioritized before households with no risk factors.
- b) Prioritization for households with extremely low income. Households that have an annual income at or below 30% AMI will be prioritized before households with income between 31% and 50% AMI.
- c) Prioritization based on susceptibility to homelessness. Households who lack a fixed, regular and adequate nighttime residence will be prioritized before lease holder households.

4. Requirement to exhaust other resources. Before providing prevention services to any household, prevention staff must determine whether they have exhausted other options available to them.

⁷ [Notice: CPD-20-08 Waivers and Alternative Requirements for the Emergency Solutions Grants \(ESG\) Program Under the CARES Act](#)

⁸ [Notice: CPD-20-08 Waivers and Alternative Requirements for the Emergency Solutions Grants \(ESG\) Program Under the CARES Act](#)

⁹ https://files.hudexchange.info/resources/documents/COVID-19-Homeless-System-Response-Grants-Management-ESG-CV-Notice-Summary.pdf?utm_source=HUD+Exchange+Mailing+List&utm_campaign=4feca7d25f-SNAPS-COVID-19-Digest-10-2-2020&utm_medium=email&utm_term=0_f32b935a5f-4feca7d25f-19411181