

**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) Meet [Very Low Income Limit for the area as established by HUD for HUD’s Section 8 and Public Housing Programs](#)²

¹ [Notice: CPD-21-08](#) An individual may qualify as homeless under paragraph (1)(iii) of the homeless definition in 24 CFR 576.2 so long as the individual is exiting an institution where the individual resided for 120 days or less and the individual resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

² [Notice: CPD-21-08](#) Waiver - an alternative requirement is established where individuals and families who meet the criteria in paragraph (2), (3), or (4) of the “homeless” definition and have an annual income that does not exceed the Very Low Income Limit.

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- e) 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 period⁴
- b) Rental arrears, up to 6 months including any late fees on those arrears⁵
- c) Rental application fees
- d) Security deposits
- e) Utility security deposits and payments (including arrears)
- f) 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 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)
- g) Housing search and placement
- h) Housing stability case management

³ [Notice: CPD-21-08](#)

⁴ [Notice: CPD-21-08](#) Waiver: Helping Current ESG Program Participants Maintain Housing. In order to ensure current program participants receiving homelessness prevention assistance do not lose their housing during the coronavirus public health crisis and the subsequent economic downturn caused by the crisis, the requirements in 24 CFR 576.105(c) and 576.106(a) are waived as follows: (i) The requirement at 24 CFR 576.105(c) limiting the total period of time for which any program participant may receive the services under paragraph (b) to 24 months during any 3-year period is waived; and (ii) The requirement at 24 CFR 576.106(a) limiting the total number of months a program participant can receive rental assistance to 24 months in a 3-year period is waived. * Program participants who receive the maximum amount of assistance (24 months within 3 years) between January 21, 2020 and March 1, 2021 may receive an additional 6 months of rental assistance and services.

⁵ [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.

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- i) Landlord-tenant mediation
- j) 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.
- k) Volunteer incentives
- l) [Hotel/ motel](#) - * Funds may be used to pay for the following hotel/motel costs for individuals and families 1) experiencing homelessness, 2) receiving rapid rehousing (RRH) assistance under the CoC or ESG programs, 3) receiving homelessness prevention (HP) assistance under the ESG program, or 4) residing in permanent supportive housing. Costs for these populations include:
 - i. Hotel or motel rooms, directly or through a voucher;
 - ii. Cleaning of hotel and motel rooms used by program participants;
 - iii. Repair damages caused by program participants above the normal wear and tear of the room;
 - iv. Essential services as established at 24 CFR 576.102(a)(1)
- m) Transportation to healthcare facilities and medical care coordination
- n) 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
- o) Credit repair
- p) Personal Protective Equipment (PPE)⁶
- q) Sponsor-Based Rental Assistance (funds may now be used for sponsor-based rental assistance)⁷
- r) Renter's Insurance⁸
- s) Laundry Services⁹

⁶ [Notice: CPD-21-08](#) Waiver / New Eligible Costs: ESG-CV funds to be used to buy PPE (such as masks, disposable gloves, and hand sanitizer) to the extent the program participant needs the PPE to avoid exposure to and prevent the spread of coronavirus (e.g., to go out in public or enter common areas of housing).

⁷ [ESG-CV Notice CPD-21-08 Summary](#) Waiver / New Eligible Costs: Alternative requirement for project-based rental assistance provided under 24 CFR 576.106(i): The recipient or subrecipient may make monthly rental assistance payments only for each whole or partial month an assisted unit is leased to a program participant, except that if a program participant moves out of an assisted unit before expiration of the agreement, the recipient or subrecipient may use ESG-CV funds to cover up to 100 percent of the rent for the unit for up to 30 days from the end of the month in which the unit was vacated, while the recipient or subrecipient attempts to house another eligible program participant in that unit. This payment will not count toward the total rental assistance provided to the next program participant housed in the unit, unless the program participant moves in during the first half of the month that is paid using this flexibility. This payment will not prevent paying up to 100 percent of the first month's rent for the new program participant as provided under 24 CFR 576.106(i)(2), as long as the payments are made for different months. This flexibility is necessary to assure recipients and subrecipients can maintain the availability of assisted units in which individuals and families experiencing or at risk of homelessness can be quickly re-housed.

⁸ [Notice: CPD-21-08](#) Waiver / New Eligible Costs: ESG-CV funds to pay for renters insurance for program participants receiving rapid rehousing or homelessness prevention assistance. In order to pay for renters insurance for program participants, the recipient or subrecipient must: (i) demonstrate that the payment of renters insurance is necessary to obtain or maintain housing (e.g., the landlord requires renters to have renters insurance to reside in the unit); and (ii) pay the renters insurance directly to the insurance company on behalf of the program participant.

⁹ [ESG-CV Notice CPD-21-08 Summary](#) Waiver / New Eligible Cost: Alternative requirements are established to the extent necessary to authorize ESG-CV funds to be used under 24 CFR.576.101(a) for the costs of providing laundry services to prevent the spread of coronavirus among individuals and families experiencing unsheltered homelessness, including by paying for laundry trucks to outdoor locations where people are residing.

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- t) Furniture & Household Furnishings¹⁰
- u) Essential Services (Services available to those receiving rapid rehousing assistance are expanded to include all listed at 24 CFR 576.102(a)(1))¹¹
- v) Vaccine Incentives¹²
- w) Expanded Use of Cell phones & Internet¹³ (limitations apply, see Notice: CPD-21-08)

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.

¹⁰ [ESG-CV Notice CPD-21-08 Summary](#) Waiver/ New Eligible Activity: This waiver and alternative requirement are also needed in order to respond to coronavirus by assuring program participants can still obtain and maintain housing during the economic downturn caused by coronavirus when their incomes and resources are not enough to obtain the furniture necessary to contribute to housing stability.

¹¹ [Notice: CPD-21-08](#) Waiver / New Eligible Costs: ESG-CV funds to be used for the costs of providing essential services established at 24 CFR 576.102(a)(1) such as mental health services, outpatient health services, transportation, and substance abuse services.

¹² [Notice: CPD-21-08](#) Waiver / New Eligible Costs: ESG-CV funds may only be used for vaccine incentives to the extent that other vaccine incentives are inaccessible or unavailable to people experiencing homelessness within the community (direct, cash payments of up to \$50 per dose to people experiencing homelessness).

¹³ [Notice: CPD-21-08](#) Waiver / New Eligible Costs: ESG-CV funds to be used under 24 CFR 576.101(a), 24 CFR 576.102(a)(1), and 24 CFR 576.105(b) for the costs of providing temporary cell phones for individuals and families experiencing homelessness, receiving rapid rehousing assistance under the Continuum of Care (CoC) Program, and ESG Program, receiving homelessness prevention assistance under the ESG Program, or residing in permanent supportive housing funded under the CoC.