

# MSHDA

*Creative uses of ESG-CV Rapid Rehousing*

*March 1, 2022*

# Framing

- Finding housing is a problem everywhere right now
- We have a one-time use of funding that can be used as flexibly (for federal money)
- We want to focus on how can you create programs that holistically support people AND spend money.
- Let's set people up for success!

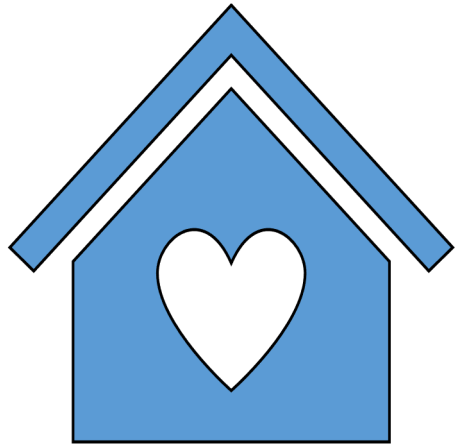
Reach out to MSHDA to talk about flexibilities!

# Equity Framing

CARES Act resources are designed to prevent the spread of COVID and to reduce the harm caused by COVID. ESG-CV funds can be used to make approaches to housing and services more equitable, sustaining and humane.

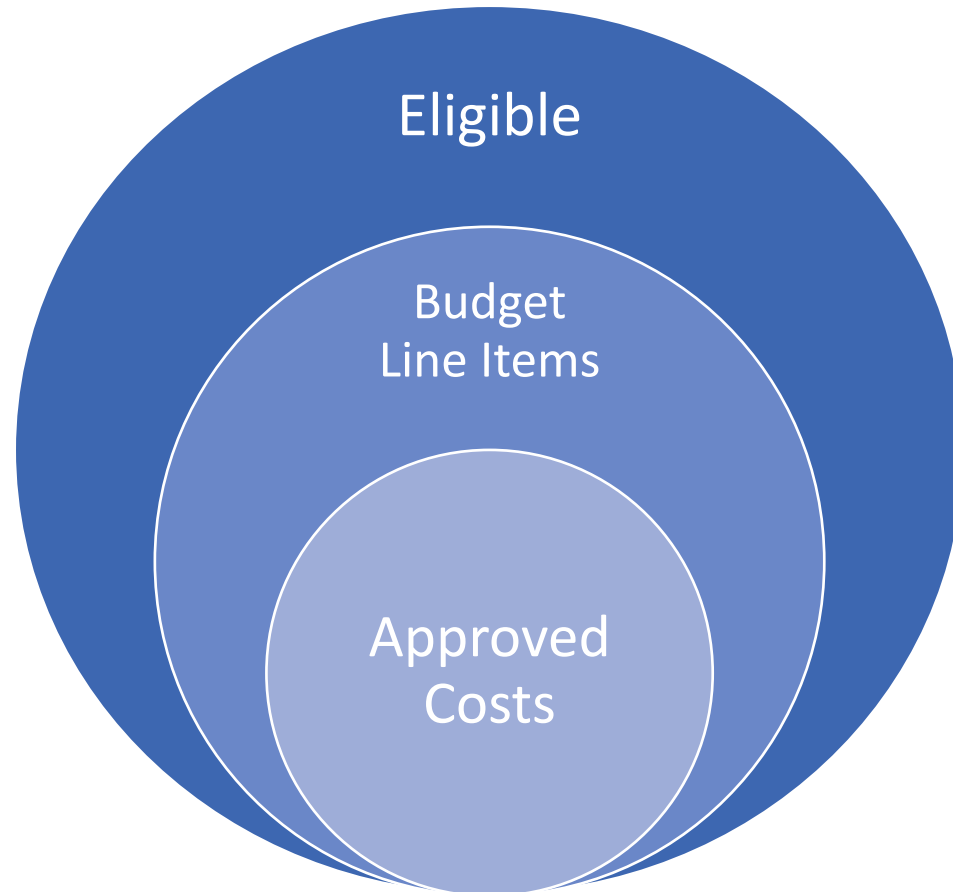
- The safest place for people to be during the epidemic is in housing. COVID-19 has amplified the historic and current racial biases and discrimination embedded in our systems, processes, and practices.
- People most harmed by COVID, housing instability, and homelessness include racial minorities, especially Black and Indigenous people, those who are elderly, and those who have health problems, especially respiratory problems.

# Housing is the safest place during a pandemic



- Maximize the use of Rapid Rehousing
- Rapid Rehousing can serve high need households and those with zero income. If needed they can be bridged to other housing.
- Create housing focused shelter to move as many people out of congregate shelter as possible— support all staff to encourage the movement to housing including helping guests connect with family and friends for housing options.
- Train Street Outreach staff to connect unsheltered households to coordinated entry and housing options

# Eligible and Approved



# Is it Eligible?

- Costs are ONLY eligible if they are:
  - Associated with a HUD-eligible project participant
  - One of the eligible activities
  - Specifically stated in your approved budget (itemized line item)
  - Documented
  - Reasonable, Allowable, and Allocable
    - Reasonable: Properly procured
    - Allowable: Part of the approved budget
    - Allocable: Directly linked to the grant

## ELIGIBLE PARTICIPANTS

# Rapid Rehousing

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# Participants

- Homeless Definition: Category 1 or 4 (if also meeting criteria for Category 1)
- No initial income requirement
- Individuals and families must have an income at or below 50% AMI at annual re-evaluation for ESG-CV only
  - NOTE: MHSDA requires income evaluation every 6-months for Rapid Rehousing under ESG & ESG-CV.

## ACTIVITIES

- Housing Relocation and Stabilization Services
  - Short and Medium-Term Rental Assistance

***(Descriptions listed in tables & chart in upcoming slide)***

# Rapid Re-Housing

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## Activities



# Rapid Re-Housing: Housing Relocation & Stabilization Services

## **FINANCIAL ASSISTANCE**

- Moving costs
- Rental application fees
- Security deposit
- Last month's rent
- Utility deposit
- Utility payments

*Staff salaries related to carrying out rapid re-housing and homelessness prevention activities are also eligible.*

## **SERVICES**

- Housing search & placement
- Housing Stability Case Management
- Mediation
- Legal Services\*
- Credit Repair

\*Legal services funded by post-notice ESG-CV funds are limited to only services necessary to help participants obtain housing or keep a participant from losing their current housing.

# Rapid Re-Housing: Short and Medium Term Rental Assistance

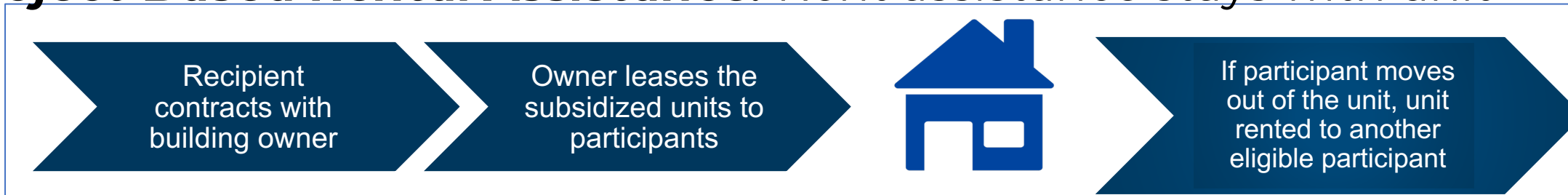
<b><i>Types of Rental Assistance</i></b>	<b><i>Length of Assistance</i></b>
<b><i>Short Term</i></b>	Up to 3 Months
<b><i>Medium Term</i></b>	4 to 24 Months
<b><i>Payment of Rental Arrears</i></b>	One-time payment up to 6 months, including any late fees on those arrears
<b><i>Any Combination of the Three Types of Rental Assistance</i></b>	Total not to exceed 24 months during any 3-YR period, including any payment for last month's rent is <b>waived</b> .
<b><i>Rental Assistance</i></b>	If a participant's first month of rent is a partial month, it does not count towards the 24 months of assistance

# Rapid Re-Housing: Rental Assistance

**Tenant-Based Rental Assistance:** Rent assistance follows participant



**Project-Based Rental Assistance:** Rent assistance stays with unit



**Sponsor-Based Rental Assistance:** Rent assistance stays with sponsor/unit



# Rapid Re-Housing: Types of Rental Assistance

- **Tenant-Based Rental Assistance**

- Program participants select a housing unit in which to live (may be within a specified service area) and receive rental assistance
- Can provide tenant-based rental assistance to those who are **subleasing** from a primary leaseholder

- **Project-Based Rental Assistance**

- ESG recipients/subrecipients identify permanent housing units that meet ESG requirements and enter into a rental assistance agreement with the owner to reserve the unit(s) and subsidize its rent so that eligible program participants have access to the unit(s)
- Grantees/subgrantees can pay for a vacant unit (e.g., holding fee) for 30 days

- **Sponsor-Based Rental Assistance (NEW)**

- ESG Recipient/subrecipient must execute a sponsor-based rental assistance agreement with a sponsor to subsidize the rent of program participants referred to be housed in units owned or leased by the sponsor. The agreement can NOT commit ESG funding to be expended or assistance provided beyond the period of performance for the funding.

# NEW ESG-CV Notice Flexibilities

Furniture and household furnishings **loaned** to households while enrolled in RRH or HP

- Example: beds, mattresses, linens, dresser, etc.
- Approved overhead costs: furniture storage, repair and moving
- Expenditures over \$5k may be subject to disposition requirements
- Add furniture and household furnishings loan procedures under agency's equipment policy.
  - Refer to requirements for equipment: [2 CFR 200.313](#) and [this HUD resource](#)
- ***Only loan what you feel comfortable getting back and reusing!***

# NEW ESG-CV Notice Flexibilities

*Interested in using essential services? Contact MHSDA for more next steps*

Essential services (those normally only eligible under Emergency Shelter) to households in RRH or now HP include:

Case Management	Life skills training
Childcare	Mental health services
Education Services	Substance abuse treatment services
Employment assistance and job training	Transportation
Outpatient health services	Services for special populations
Legal Services	

See ESG Interim Rule (24 CFR 576.102(a)(1)) for list of eligible costs.

# **NEW** ESG-CV Notice Flexibilities

## **2021 ESG-CV Notice**

- Cell Phones: Cost of cell phone and wireless plan loaned to participants
- Vaccine Incentives : Ability to provide \$50 per dose vaccine incentive to to people experiencing homelessness for receiving the COVID-19 vaccine.
- PPE: Costs to purchase personal protective equipment (PPE) for program participants within essential services (Ex. Masks, disposable gloves, hand sanitizer, etc.)
- Rental Insurance: Renters Insurance for households in RRH when required by lease.

## **2020 ESG-CV Notice (still eligible)**

- Hazard Pay for staff and Volunteer Incentives
- Training on infectious disease prevention and mitigation (including vaccines)

# NEW ESG-CV Notice Flexibilities

## 2020 ESG-CV Notice (still eligible)

Landlord Incentives can total 3x cost of rent **charged for the unit** and can cover:

Signing bonuses up to \$500 per unit (MHSDA)	Repair damages not covered by security deposit (up to \$1,500 per household per MHSDA)
Security deposits up to 1.5x contract rent (state statute)	Maintenance to expedite turnover
Referral bonuses for landlords who recruit other landlords	Cleaning units



# Waivers and Alternative Requirements

- ***Subleasing*** - Participants may enter into subleases when receiving rapid re-housing or homelessness prevention assistance.
- ***Habitability or Housing Quality Standards (HQS)*** –
  - HQS can be used to meet housing standards requirements (in lieu of habitability standards).
  - Housing relocation and stabilization services for participants receiving homelessness prevention assistance may be provided without conducting a habitability or HQS inspection.
- ***Housing Stability Case Management*** –
  - Waives requirement to provide monthly case management.
  - Recipients/subrecipients providing housing stability case management may provide those services for up to 60 days (versus 30 days) while the participant is seeking housing.

# Group Questions

- Which of these flexibilities are you currently using in your program?
- Which ones are you interested in implementing?
- What questions do you have about how use these flexibilities in your program?

# Putting it Together

ABC Program recognizes it's hard to find housing right now in Michigan, they've made the following program adjustments:

- Using rent reasonableness instead of FMR for finding housing units
- Allowing participants to sign a sub-lease for units they find in the community.
- Set-up ride-share transportation accounts/profiles to help RRH participants make it to housing views, critical appointments, etc. (Note: they are even able to tip the driver using ESG-CV)
- Provides hotel/motel stays for participants who are exposed to/currently have COVID to allow for isolation/quarantine
- Providing PPE to all participants (and staff)

# Putting it Together

- Program Spartans is taking advantage of the ESG-CV flexibilities. Here's some of their program changes:

Using rent reasonableness

Providing landlord incentives and a risk mitigation fund to landlords willing to rent to their participants.

Covering the childcare costs with a licensed childcare provider

Encouraging participants to explore finding housing with a roommate

Covering the costs of participants receiving outpatient care (such as COVID-19 tests) by a licensed medical professionals

Connecting people to job readiness classes

Paying for credit repair

# Putting it Together

- Program Wolverines is taking advantage of the ESG-CV flexibilities. Here's some of their program changes:

Master leasing 8-units  
for high-acuity  
participants

Vaccine incentives

Covering the costs of a  
tutor, books, and fees  
for participants to take  
the GED test

Covering the costs of  
participants receiving  
outpatient care,  
including dental

Individual, family, or  
group therapy

Legal representation for  
child support,  
guardianship, and  
resolving outstanding  
criminal warrants

# RRH & Equity Building Blocks

- Avoid a cookie cutter approach! Use all the flexibilities offered by Rapid Rehousing to provide each household what they need including the possibility that some households may need longer or deeper assistance due to inequities like housing and employment discrimination
- Mitigate for housing barriers like criminal justice involvement and poor/no credit which disproportionately impact Black, brown and Indigenous communities
  - Consider using project-based and sponsor-based RRH models to better assist households with higher barriers such as criminal histories or credit challenges.
  - Use Landlord incentives to negotiate with landlords to waive or soften their screening criteria

# RRH & Equity Building Blocks

- Examine your RRH Data and disaggregate by demographic data to see if there are disparities and ensure a diverse group is examining the data and acting on it
  - ***Who is being referred into the program and who is not?***
  - ***How long is it taking different groups to move to housing?***
  - ***Which groups are more likely to exit back into homelessness?***

# Next steps

- What are services participants have asked for in your RRH program? Is it possible ESG-CV can be used to offer them?
- What are barriers you've seen for participants finding OR staying housed? How can ESG-CV be used to break those barriers?
- What other agencies/organizations are skilled in essential services that you can contract with/refer clients to?
- Other thoughts/ideas?



# ESG Resource Links

- [ESG Regulations - \(update published April 2017\)](#)
- [ESG-CV Notice](#)
- [MHSDA ESG Program](#)
- [General ESG Information](#)
  - [HUD ESG Landing Page](#)
  - [ESG Program Overview](#)
  - [ESG Program HMIS Manual](#)
  - [ESG Minimum Habitability Standards ES and Permanent Housing](#)
- [ESG Standards and Inspections](#)
- [Habitability Example Checklist](#)

- [TA Resources:](#)
  - [Disease Risks and Homelessness - landing page for resources on a wide range of topics](#)
  - [ESG-CV Notice Summary](#)
  - [Flexibilities/Waivers Granted by the CARES Act + Mega Waiver and Guidance - applicable Waivers on pages 11-14](#)
  - [Strategies to Design and Implement a Successful ESG-CV Program](#)
  - [IDIS Fact Sheet for ESG and ESG-CV Funds Setup](#)
  - [ESG-CV Quarterly Reporting Calendar](#)
  - [National Alliance RRH Toolkit](#)

# COVID Response Resources

## ***Standing Up Infection Control Measures:***

- [Alternative Approaches to Sheltering](#)
- [Shelter Preparedness Checklist](#)
- [Creative Staffing Solutions \(See Appendix 1\)](#)
- [COVID Informational Flyers](#)
- [Vaccine Messaging Toolkit](#)
- [Eligible ESG Program Costs for Infectious Disease Preparedness](#)

## ***CDC and NHCHC Guidance:***

- [Strategies for Proactive Universal Testing](#)
- [Guidance for Service Providers to Respond to COVID](#)

# Essential Services – Case Management

*Housing-focused case management activities assess, arrange, coordinate, and monitor individualized services developed for program participants to end their homelessness.*

- Assessing, arranging, coordinating, monitoring individualized services.
- Using the centralized or coordinated assessment system
- Initial evaluation including verifying and documenting eligibility
- Counseling
- Developing, securing and coordinating services including Federal, state, and local benefits
- Monitoring and evaluating program participant progress
- Providing information and referrals to other providers
- Providing ongoing risk assessment and safety planning with victims of domestic violence, dating violence, sexual assault, and stalking
- ***Developing an individualized housing and service plan***

# Essential Services –

## Child Care

*Licensed childcare for program participants with children under the age of 13, or disabled children under the age of 18.*

- Childcare costs
- Meals and snacks
- Comprehensive and coordinated sets of appropriate developmental activities

# Essential Services -

# Education Services

*Instruction or training to enhance participants' ability to obtain and maintain housing: literacy, English literacy, GED, consumer education, health education, and substance abuse prevention.*

- Educational services / skill-building
- Screening assessment and testing  
Screening, assessment and testing
- Individual or group instruction
- Tutoring
- Provision of books, supplies and instructional material
- Counseling
- Referral to community resources

# Essential Services –

# Employment Assistance and Job Training

Services assisting participants secure employment and job training programs.

- Classroom, online and/or computer instruction
- On the-job instruction
- Job finding, skill-building
- Reasonable stipends in employment assistance and job training programs
- Books and instructional material
- Employment screening, assessment, or testing
- Structured job-seeking support
- Special training and tutoring, including literacy training and pre-vocational training
- Counseling or job coaching
- Referral to community resources

# Essential Services –

# Outpatient Health Services

***Direct outpatient treatment of medical conditions provided by licensed medical professionals.***

- Assessing health problems and developing a treatment plan
- Assisting program participants to understand their health needs
- Providing or helping participants obtain appropriate medical treatment, preventive medical care, and health maintenance services, including emergency medical services
- Providing medication and follow-up services
- Providing preventive and non-cosmetic dental care

# Essential Services –

## Legal Services

*Necessary legal services regarding matters that interfere with the program participant's ability to obtain and retain housing*

- Hourly fees for legal advice and representation by licensed attorneys and certain other fees-for-service
- Client intake, preparation of cases for trial, provision of legal advice, representation at hearings, and counseling
- Filing fees and other necessary court costs



# Essential Services

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## Legal Services

Legal representation and advice to resolve legal problems that prevent participants from obtaining or retaining permanent housing:

- Child support
- Guardianship
- Paternity
- Emancipation
- Resolution of outstanding criminal warrants
- Legal separation
- Appeal of veterans and public benefit claim denials
- Orders of protection and other civil remedies for victims of domestic violence, dating violence, sexual assault, and stalking

# Essential Services –

# Life Skills Training

- *An opportunity to support your participants in strengthening the critical life skills they've identified as helpful for them to live independently in the community.*
- Budgeting resources
- Managing money
- Managing a household
- Resolving conflict
- Shopping for food and needed items
- Improving nutrition
- Using public transportation
- Parenting

# Essential Services –

# Mental Health Services

- *Direct outpatient treatment of mental health conditions by licensed professionals*
- Crisis interventions
- Individual family or group therapy sessions
- Prescription of psychotropic medications or explanations about the use and management of medications
- Combinations of therapeutic approaches to address multiple problems.

# Essential Services – Substance Abuse Treatment Services

- ***Substance use treatment services provided by licensed or certified professionals, designed to prevent, reduce, eliminate or deter relapse of substance use or behaviors.***
- Client intake and assessment
- Outpatient treatment for up to thirty days
- Group and individual counseling
- Drug testing

# Essential Services – Transportation

- *Costs of travel by program participants to and from medical care, employment, childcare, or other facilities that provide eligible essential services; and cost of staff travel to support provision of essential services*
- Cost of a program participant's travel on public transportation
- Mileage allowance for service workers to visit participants
- Travel costs of staff to accompany or assist program participants to use public transportation

# Essential Services –

# Services for Special Populations

- *Otherwise eligible essential services tailored to address the special needs of homeless youth, victims of domestic violence and related crimes/threats and people living with and related crimes/threats, and people living with HIV/AIDS HIV/AIDS in emergency shelters.*
- Case Management
- Legal Services
- Child Care
- Life Skills Training
- Education Services
- Mental Health Services
- Employment Assistance & Job Training
- Substance Abuse Treatment Services
- Outpatient Health Services
- Transportation