



**Date:** February 28, 2017

**To:** AHFE Coordinating Board

**From:** AHFE Jurisdictional Staff (Dawn Martin, Joint Office of Homeless Services)

**Re:** Proposed Guidelines for HUD Emergency Solutions Grants (ESG) Program

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The following decision related to the Proposed Guidelines for HUD Emergency Solutions Grants (ESG) Program will be discussed at the March 1, 2017 meeting:

**REQUESTED COORDINATING BOARD ACTION:**

Approve the ESG Guidelines for Shelter and Rapid Re-Housing

**BACKGROUND**

- HUD regulations (24 CFR 576.400(e)) require that if an Emergency Solutions Grant (ESG) recipient is a metropolitan city, the recipient must have written standards for providing ESG assistance and must consistently apply those standards for all program participants.
- In Portland/Multnomah County, funds are directed to both Emergency Shelter and Rapid Re-Housing programs.
- Only one program, Home Forward, uses ESG funds for Rapid Re-Housing and, in 2014, both HUD and PHB approved the guidelines they had developed.
- In the past several months, JOHS staff collected policies and procedures already in place at two shelter programs where ESG funds are used and reviewed ESG Guidelines from other jurisdictions. JOHS staff outlined emergency shelter guidelines based on HUD's ESG regulations, in alignment with Community Shelter Guidelines previously approved by Coordinating Board Draft guidelines were reviewed and approved by the Safety Off the Streets (SOS) committee.
- This revised draft was sent to the local HUD Field Office for preliminary input and they have requested additional details regarding documenting homeless status and system coordination among emergency shelter providers.
- At this time, we are seeking Coordinating Board approval of both sets of guidelines.

**RECOMMENDED ACTION**

Approve the ESG Guidelines for shelter and rapid re-housing, with the caveat that the final version (with details on documentation) will be shared with the Coordinating Board via email.





# Emergency Solutions Grants Guidelines for Emergency Shelter, Homelessness Prevention, and Rapid Re-Housing in Portland/Gresham/Multnomah County

## Program Summary

The Emergency Solutions Grant (ESG) Program is funded by the Department of Housing and Urban Development (HUD) Homeless Emergency Assistance and Rapid Transitions to Housing Act of 2009 (HEARTH Act). Program regulations are established in the HUD ESG Interim Rule (ESG Program and Consolidated Plan Conforming Amendment of 24 CFR Parts 91 and 576, Docket No. FR-5474-I-01, RIN 2506-AC29). The City of Portland is a grantee of HUD and will administer this award for Portland/Gresham/Multnomah County. All ESG agencies must follow all applicable sections of the ESG Interim rule as established in these ESG Guidelines.

The Emergency Solutions Grant (ESG) provides federal funds to (1) engage homeless individuals and families living on the street; (2) improve the number and quality of emergency shelters for homeless individuals and families; (3) help operate these shelters; (4) provide essential services to shelter residents; (5) rapidly re-house homeless individuals and families; and (6) prevent families/individuals from becoming homeless.

In FY 2017 the City of Portland received \$702,193 in ESG funds. In coordination with A Home for Everyone, the City of Portland obligated these funds through the Joint Office of Homeless Services to support \$420,591 for Emergency Shelter, \$231,955 for Rapid Re-Housing, and \$49,647 for administration, representing 7% of the ESG allocation. Separately, Oregon Housing and Community Services allocated \$110,777 of its state-level ESG award to Multnomah County, all of which was dedicated to emergency shelter activities.

A Home for Everyone hosted a series of community dialogues to develop guidelines for a variety of program areas including Emergency Shelter. The sessions were facilitated by staff from CSH, a national housing policy agency. There was a wide range of participation from community partners – service providers, persons with lived experience of homelessness, colleagues from business, health, faith, and mainstream services. The work of developing guidelines was based on AHFE performance goals, values and priorities, as set out in our AHFE plan and the work of the AHFE Coordinating Board subcommittees.

Subgrantees are required to comply with the following minimum program standards as outlined in 24 CFR Part 576.400(e)(3)

# Emergency Shelter Guidelines

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The guidelines for ESG funds used in emergency shelter as written below align with these community shelter guidelines.

Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under Emergency Solutions Grant (ESG).

1. All applicants must be assessed to determine eligibility for receipt of ESG funded services. Homeless households who meet one or more of HUD determined categorical homeless definitions or criteria are eligible to receive program assistance. Per §576.500 homeless status must be verified. This can be accomplished either through third-party verification, case manager's observation, or household's certification.
2. Homeless status will be documented by entering the household into HMIS.

Standards for targeting and providing essential services related to street outreach.

Outreach activities are not funded with ESG in Portland/Gresham/Multnomah County.

Policies and procedures for admission, diversion, referral, and discharge by emergency shelters including length of stay, and safeguards to meet the safety and shelter needs of special populations, e.g. victims of domestic violence, dating violence, sexual assault, and stalking; and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.

1. Clients may be admitted to ESG-funded emergency shelters on a first-come-first-served basis, or through prioritized access based on other criteria or process proposed by the shelter operator and approved by the Joint Office of Homeless Services. Prioritized access should generally be reserved for high-priority populations identified through A Home for Everyone and included in the Community Program Guidelines for Emergency Shelter.
2. Diversion activities are not funded with ESG in Portland/Gresham/Multnomah County.
3. Referral can occur through calling 211info, our communities' source of information and referral, through client self-referral, or through referral by a range of partnering agencies proposed by the shelter operator and approved by the Joint Office of Homeless Services.
4. The subgrantee must exercise judgment and examine all extenuating circumstances in determining when violations warrant termination so that a program participant is

terminated only in the most severe cases. The subgrantee may terminate in accordance with a formal process established by the subgrantee.

5. There is no limit to length of stay, though programs are encouraged to rapidly rehouse people as quickly as possible. Generally lengths of stay should not exceed 60 days, however individual clients exceeding this standard length of stay should not be discharged from the shelter in order to limit the length of stay.
6. Any shelter facility that receives ESG assistance operations is required to meet all federal, state, and local government safety, sanitation, and accessibility standards including compliance with the safety, sanitation, and privacy requirements contained in 24 CFR 576.403. Reasonable accommodations for persons with disabilities must be available in order to ensure disabled participants have an equal opportunity to utilize the shelter and receive essential services.
7. In order to ensure access to shelter facilities and services for individuals with limited English proficiency, it is highly recommended that subgrantees develop and implement an agency Language Access Plan following guidelines provided in the Fair Housing Guide for Shelter and Transitional Housing Providers which can be accessed at [www.fhco.org](http://www.fhco.org)
8. If a survivor discloses they have experienced domestic violence within six months of request for shelter services or are actively fleeing and in need of a safe, confidential emergency shelter, shelter staff, utilizing a trauma-informed, survivor centered lens , may refer participant to Call to Safety or Linea UNICA for services (English and Spanish speaking DV Crisis Lines)\* 1. Shelter staff are encouraged to do “warm-hand offs” with the participants informed consent if information is to be shared. Shelter staff should acquire baseline domestic violence training.

Policies and procedures for assessing, prioritizing, and reassessing individuals’ and families’ needs for essential services related to emergency shelter.

1. Each client in the adult system should be connected to an Advocate or staff member, if not already connected, to access local services as requested. Participants in the family system can access housing services through the coordinated entry system.
2. Clients may have ongoing contact with Case Managers/Advocates so that individuals’ and families’ needs for essential services may be prioritized and reassessed.

System coordination among emergency shelter providers and other system resources. Multnomah County’s Continuum of Care provides the main coordination function to ensure knowledge of the services available in the Continuum from shelter providers, essential services providers, homelessness prevention and rapid re-housing providers, other homeless assistance providers, and mainstream employment service and housing providers. The Coordination Policy is carried out by the following:

- Regular attendance at A Home for Everyone monthly meetings
- Safety off the Streets (SOS) Workgroup monthly meetings

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\*All domestic violence services are voluntary; a survivor must give consent to referrals.

- Annual updates from ESG Recipient to A Home for Everyone on status of ESG activities including consultation opportunities.
- Ensuring the mainstream and employment service providers attend A Home for Everyone meetings regularly.
- There is homeless consumer input in developing programs and the homeless response system.

## Rapid Re-Housing Guidelines

Home Forward's Rapid Re-Housing Guidelines are multiple pages. A link to the full guidelines are here: [ahomeforeveryone.net/s/ESG\\_Guidelines\\_HF.pdf](https://ahomeforeveryone.net/s/ESG_Guidelines_HF.pdf)