



ESG-CV Notice CPD-21-08 Webinar

July 29, 2021



Webinar Format and Housekeeping Items

- 90 minutes total
- Approximately 25 minutes for questions
- Participants are muted by default
- To ask a question at any time, use the Chat Box feature to the left of the presentation slides
- We will answer as many questions as possible during the Q&A portion of the webinar
- After the webinar, please submit any outstanding questions to HUD AAQ

Speakers & Resource Advisors

Department of Housing and Urban Development

Office of Special Needs Assistance Programs

- Lisa Coffman, Senior Program Specialist
- Brett Esders, Senior Program Specialist
- Marlisa Grogan, Senior Program Specialist
- Mandy Wampler, Program Manager, Philadelphia Field Office
- Abby Sosland, HUD TA Provider, ICF International
- Micah Snead, HUD TA Provider, CSH

Equity Framing

- CARES Act resources are designed to prevent the spread of COVID and to reduce the harm caused by COVID.
- 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.

Equity Framing

- COVID has also had an economic impact on our communities, including job loss, housing instability, and increased risk of homelessness, and these economic effects are also most likely to impact racial minorities, especially Black and Indigenous people.
- HUD is committed to working with CoCs and ESG grantees and supporting communities advancing their efforts to be more equitable and to close racial disparities.
- More information available at [Racial Equity](#)

Session Goals

- Highlight changes from Notice CPD-20-08, including:
 - Emergency Shelter and Temporary Emergency Shelter Activities
 - New Eligible Activities
 - Additional Waivers and Flexibilities
- Review program requirements and topic areas that generate a lot of questions

Applicability of Waivers & Alternative Requirements

- Supersedes Notice CPD-20-08, reestablishes the allocation formula and amounts, and reestablishes and announces new requirements for ESG-CV funds.
- Requirements at 24 CFR Part 576 apply to these funds unless otherwise provided by alternative requirements and flexibilities.
- [Notice CPD-21-05](#) will continue to apply and is not impacted by Notice CPD-21-08.
- Recipients that receive individual waivers or exceptions may continue to apply those and also use any further flexibility provided in the updated ESG-CV Notice.

Applicability of Waivers & Alternative Requirements

- Waivers and alternative requirements deemed effective as of the date your community began responding to coronavirus but no earlier than January 21, 2020.
- Each recipient must maintain adequate documentation to assure waivers and alternative requirements are used with eligible activities to prevent, prepare for, and respond to coronavirus (i.e., documentation demonstrating when your community began COVID response).
- Applies to all ESG-CV funds no matter when HUD reviewed the substantial amendment/action plan

Applicability of this Notice to Annual ESG Funds

- If recipients use annual ESG funds (FY 2020 and older) to “prevent, prepare for, and respond to coronavirus” and meet the conditions in Section IV of the Notice, the flexibilities available for ESG-CV funds also apply to those annual funds until September 30, 2022.
- ESG recipients must document how their funds are being used to prevent, prepare for, and respond to coronavirus, also known as “PPR tieback”. See: [ESG-CV Prevent, Prepare, and Respond Tieback Flexibilities Quick Guide](#)

Prevent, Prepare, and Respond (PPR) to Coronavirus Tieback Flexibilities

- Document PPR at the ESG component level (i.e., street outreach, emergency shelter, rapid rehousing, homelessness prevention, and Homeless Management Information System [HMIS]), not at the program participant or household level.
- Use examples of specific activity types (e.g., landlord incentives, hazard pay, temporary emergency shelter, hotel/motel vouchers) to describe the scope of the ESG component being funded.
- Recipients must document the PPR tieback in each activity description in the Integrated Disbursement and Information System (IDIS).

Additional Eligible Activities

Cell Phones and Internet	PPE for HP and RRH Program Participants	Furniture and Household Furnishings
Essential Services for RRH, HP, hotels/motels	Centralized or Coordinated Assessment	Renters Insurance
Vaccine Incentives	Laundry	Sponsor-Based Rental Assistance

Cell Phones and Internet

- Allows the costs of providing temporary cell phones for individuals and families experiencing homelessness
- Cell phone must be owned by the recipient/subrecipient
- Wireless service plan must be the recipient/subrecipient's
- Phone may be loaned to program participants and the wireless service cost may be paid as needed to enable participants to participate in activities necessary to obtain or maintain housing.
- Applies to participants in CoC, YHDP, and ESG rapid re-housing, participants in ESG homelessness prevention, and participants in CoC and YHDP permanent supportive housing.

PPE for HP and RRH Program Participants

- Costs to purchase personal protective equipment (PPE) such as masks, disposable gloves and hand sanitizer for program participants as an essential service under emergency shelter and street outreach and for program participants receiving homelessness prevention and rapid re-housing.

Furniture and Household Furnishings

- Rapid re-housing and homelessness prevention funds may be used buy furniture and household furnishings for participant use while they are receiving assistance.
- Purpose of this activity is to contribute to housing stability in cases where participants do not have income or resources to obtain their own.
- Subject to the requirements for equipment at 2 CFR 200.313

Essential Services for RRH, HP, hotels/motels

Services available to those receiving rapid re-housing or homelessness prevention assistance are expanded to include all listed at 24 CFR 576.102(a)(1) including:

- Case management
- Child care
- Education services
- Employment assistance and job training
- Outpatient health services
- Legal services
- Life skills training
- Mental health services
- Substance abuse treatment services
- Transportation
- Services for special populations

Renters Insurance

- The costs of renters insurance for program participants enrolled in rapid re-housing or homelessness prevention.
- The recipient must demonstrate the payment is necessary to obtain or maintain housing (i.e., landlord requirement) AND pay the insurance directly to the insurance company on behalf of the participant.

Centralized or Coordinated Assessment

- Additional costs to update, enhance, and operate centralized or coordinated assessment system under 24 CFR 576.400(d).
- Documentation of costs must show the use of ESG-CV funds is limited to an increase in system costs due to coronavirus; and,
- Recipient use of funds must be coordinated with the applicable Continuum of Care to ensure funds are used for the most critical centralized or coordinated assessment needs to all the CoC to quickly prioritize and refer to assistance individuals and families experiencing homelessness and at risk of homelessness.

Sponsor-based Rental Assistance

- Sponsor-based rental assistance may be funded as an alternative to tenant-based and project-based rental assistance when necessary to use rapid re-housing and homelessness prevention to re-housing participant quickly in permanent housing.
- 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 applicable period of performance for the funding.
- Each unit may only be occupied by program participants

Vaccine Incentives

- Direct, cash payments of up to \$50 per dose to people experiencing homelessness as an incentive for receiving a coronavirus vaccine.
- ESG-CV funds may only be used for vaccine incentives to the extent other vaccine incentives are inaccessible or unavailable to people experiencing homelessness within the community.

Laundry

- Costs of providing laundry services to prevent the spread of coronavirus among individuals and families experiencing unsheltered homelessness.
- Includes paying for laundry trucks to outdoor locations where people are residing.

IDIS Set-Up

- Standard IDIS project and activity set up instructions remain the same
 - One HESG project per grant year – FY 2020 project will include both the ESG-CV grant and the annual ESG grant for FY 2020
 - One activity per activity category
- The new eligible activities will be "charged" and grouped with the existing eligible activity components in IDIS.

IDIS & Reporting Additional Eligible Activities

Activity	IDIS Activity Category	Report in Sage
Cell Phones and Internet	Street Outreach	Street Outreach: Essential Services
PPE	Street Outreach, Emergency Shelter, Rapid re-housing, Homelessness prevention	Street Outreach: Essential services; Emergency Shelter: Essential services; Rapid re-housing: Relocation and stabilization services – Services; Homelessness prevention: Relocation and stabilization services – Services
Furniture and Household Furnishings	Rapid re-housing and Homeless Prevention	Rapid re-housing: Relocation and stabilization services – Services; Homelessness prevention: Relocation and stabilization services – Services

IDIS & Reporting Additional Eligible Activities

Activity	IDIS Activity Category	Report in Sage
Essential Services for Rapid re-housing and Homelessness prevention	Rapid re-housing and homelessness prevention	Rapid re-housing: Relocation and stabilization services – Services; Homelessness prevention: Relocation and stabilization services – Services
Centralized or Coordinated Assessment	Street Outreach	“Other ESG-CV Expenditures” as its own budget line item
Renters Insurance	Rapid re-housing and homelessness prevention	Rapid re-housing: Relocation and stabilization services – Services; Homelessness prevention: Relocation and stabilization services – Services

IDIS & Reporting Additional Eligible Activities

Activity	IDIS Activity Category	Report in Sage
Vaccine Incentives	Street Outreach, Emergency Shelter, Rapid re-housing, Homelessness prevention	"Other ESG-CV Expenditures" as its own budget line item
Laundry	Street Outreach	Street Outreach: handwashing stations/portable bathrooms/laundry services
Sponsor-based rental assistance	Rapid re-housing and homelessness prevention	Rapid re-housing: Rental housing; Homelessness prevention: Rental housing

Waivers and Alternative Requirements

- **Time limit on shelter** – The 1/31/2022 deadline for spending ESG-CV on emergency shelter or temporary emergency shelter is lifted. ESG-CV funds may be used to pay for emergency shelter and temporary emergency shelter costs as needed through 9/30/2022.
- **Converting TES to ES** – Allows conversion of Temporary Emergency Shelter acquired or improved with ESG-CV funds into Emergency Shelter without triggering disposition requirements.

Waivers and Alternative Requirements

- **Time limit on medium-term rental assistance** – 12-month limit on medium-term rental assistance is lifted.
- **Expansion of RRH and HP assistance** –
 - Limit on maximum amount of rental assistance and services costs (24 months within 3 years) is waived.
 - When a program participant moves into a unit in the middle of the month, the initial payment of the partial-month's rent doesn't count towards total rental assistance limit.
- **PBRA Flexibility** –
 - When a program participant moves into a unit in the middle of the month, the initial payment of the partial-month's rent doesn't count towards total rental assistance limit.
 - May pay rent for a maximum of 30 days from the end of the month in which the unit was vacated while attempting to housing another program participant in the unit.

Waivers and Alternative Requirements

- **Subleasing** - Participants may enter into subleases when receiving rapid re-housing or homelessness prevention assistance.
- **Habitability or 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.

Waivers and Alternative Requirements

- **Subawards to Tribes & TDHEs** – Waives definition of “subrecipient” to include Tribes and Tribally-Designated Housing Entities
- **Expanded Use of Instrumentalities** – Waives definition of “state” and “territory” to include use of an “instrumentality” for Puerto Rico and Territories.
- **At risk of homelessness definition** – Income limit raised from 30% of AMI to Very Low-Income limit of the area.
- **Re-evaluation Income Limits** – Income limit raised from 30% of AMI to Very Low-Income limit of the area to continue receiving either Homelessness Prevention or Rapid Re-housing assistance.

Program Design Impact of Alternative Requirements

Focus on resolving the current housing crisis first

- Remember RRH has three key components: 1) Housing Identification; 2) Rent and Move-in Assistance; and 3) RRH Case Management and Services. Remember to prioritize client choice for identifying housing.
- Focus on what the client needs now to stabilize. Prioritize connecting to community resources that support the behavioral health and other needs of the individual or family.
- Provide trauma-informed services - The experience of becoming homeless and the transition back into housing can be traumatic.

Program Design Impact of Alternative Requirements

After stabilization, begin a client-directed conversation about goal setting

- Prioritize transition planning; consider employment and benefits to increase monthly income.
- Don't assume high acuity clients will need to transition to a longer-term subsidy or deeper interventions. If clients identify a need for ongoing support, the administrative burden is carried by the staff and not the participant.

Changing Your ESG-CV Approach

- Much has changed since last year when communities began their COVID response
- Take the opportunity to reevaluate your strategy for using ESG-CV funds to address the severest housing needs
- Use this once-in-a-lifetime opportunity to focus your ESG-CV resources on housing the most vulnerable people in your community – those experiencing literal homelessness.
- If you have implemented non-congregate shelter during the pandemic, this is an opportunity to permanently house those individuals and ensure that no one returns to shelter or unsheltered homelessness

Changing Your ESG-CV Approach

- Consider reprogramming Homelessness Prevention funds to Rapid Re-housing. Prioritize Treasury Emergency Rental Assistance Program (ERAP) funds for eviction prevention.
- Consider using ESG funding to provide supportive services to support households receiving an Emergency Housing Voucher (EHV).
- Strategically use ESG for landlord incentives and landlord engagement activities to broaden access to available rental units
- Consider using ESG funds to provide vaccine incentives to people experiencing homelessness, which could make the difference between someone choosing to be vaccinated or not.

Changing Your ESG-CV Approach

- Consider using emergency shelter funds to continue infection control protocols, maintain social distancing, etc.
- Continue supporting on-site vaccination and testing events in coordination with public health
- Begin to rethink approaches to emergency shelter and implement corresponding improvements for the long term – to continue building on progress made as part of COVID response, such as:
 - Improved infection control measures
 - Increased bed spacing
 - Enhanced sanitation practices
 - Close coordination and partnerships between local public health, health centers

Changing Your ESG-CV Approach

- Bolster street outreach staffing and coverage – on-the-ground presence is essential to linking people to health care, reducing spread, and ensuring vaccine access
- Continue supporting on-site, mobile vaccination and testing events in coordination with public health
- Review terms of written agreements with providers to determine if and when reallocating or reprogramming funds is possible.

Changing Your ESG-CV Approach

- Amendments to the Consolidated Plan or Annual Action Plan should be made in accordance with 24 CFR 91.505
- Repurposing funds from one activity to another may not necessarily require the need for a Substantial Amendment – reach out to your field office or submit an AAQ if you need feedback in making that determination.
- Remember: the public comment period and citizen participation requirements waived for both ESG-CV and annual ESG used for COVID response. Requirement is to publish planned changes on your government website.

Additional Guidance Coming from HUD

- ESG-CV Notice CPD-21-08 Summary
- ESG-CV Case File Toolkit
- Changing Your ESG-CV Approach
- IDIS Fact Sheet for ESG and ESG-CV Funds Setup

Keep checking HUD Exchange for additional updates

Q & A

