

COVID-19

Grants Management Support: Adjusting ESG Written Standards for ESG-CV

During COVID-19, coronavirus Emergency Solutions Grants (ESG-CV) recipients should collaborate with local and state public health partners to integrate infection control practices into homeless service delivery systems where appropriate. If any ESG written standards must be updated due to the need to prepare for, prevent, and respond to COVID-19, then recipients will need to document these changes. If changes to regular ESG written standards are minimal as a result of ESG-CV updates, these changes can be documented in an addendum. This product outlines the most common areas that may need to be updated in regular ESG written standards and provides sample framing language that may be used or adapted for local context.

Back to Basics: What are the ESG Written Standards Requirements?

See the ESG Program regulations at [24 CFR 576.400\(e\)](#).

State Recipients	Metropolitan Cities/Urban Counties/Territories
<p>The recipient must establish and consistently apply (or require that its subrecipients establish and consistently apply) written standards for providing ESG assistance. These standards must be:</p> <ul style="list-style-type: none">A. Established for each area covered by a Continuum of Care (CoC) or area over which the services are coordinated and followed by each subrecipient providing assistance in that area; orB. Established by each subrecipient and applied consistently within the subrecipient's program. <p>Written standards developed by the state must be included in the state's Consolidated Plan. If the written standards are developed by its subrecipients, the recipient must describe its requirements or the establishment and implementation of these standards in the state's Consolidated Plan.</p>	<p>If the recipient is a metropolitan city, urban county, or territory, the recipient must have written standards for providing ESG assistance and they must be included in its Consolidated Plan.</p>

Written Standards Commonly Requiring Updates for Coronavirus Response

Required ESG Written Standard	ESG-CV Addendum Language—Sample Written Standard
<p>Coordinate with public health partners to establish COVID-19-specific procedures where appropriate. If compliance with public health guidance is different for victims of domestic violence or other protected populations, document these alternative procedures.</p>	<p>Core parts of the way crisis response systems operate may change as a result of COVID-19. If a recipient has set COVID-19 standards for how major parts of the system operate, they should be documented in their ESG-CV written standards.</p> <p>Sample Language:</p> <p><i>If shelters utilize symptom screening as a part of intake procedures, it must be reviewed and approved by a local public health partner such as the county’s or state’s department of public health or the Healthcare for the Homeless partner.</i></p> <p><i>Shelters funded by ESG-CV must establish referral pathways to isolation and quarantine if a client is in need of such services.</i></p> <p><i>Shelters funded through ESG-CV will maintain social distancing requirements established in partnership with the county’s or state’s department of public health.</i></p>
<p>Expanded Definition of ESG-CV-Eligible Shelter Funds.</p>	<p>ESG-CV allows for a variety of spaces to be used as temporary shelters. If the recipient funds new and different kinds of shelter, that should be explained.</p> <p>Sample Language:</p> <p><i>The purpose of ESG-CV funds is to prevent, prepare for, and respond to COVID-19 in order to prevent and mitigate the spread of COVID-19 among people experiencing homelessness and the staff that provide services to these individuals. This requires that existing shelters implement public health protocols such as enforcing social distancing, establishing an isolation space (especially for residents suspected of having COVID-19, those with confirmed cases, and high-risk residents such as elderly people and people with pre-existing health conditions), using personal protective equipment (PPE), and cleaning/disinfecting shared and living spaces. In many communities where existing shelter is not available or where current shelters are not able to implement these safety protocols, additional space may need to be identified to allow people to have shelter while staying as healthy as possible. This may be space within an existing shelter (e.g., an office not being used) that could be temporarily converted into a quarantine space for someone who has tested positive or is awaiting test results, or it could be an entirely separate building. Eligible shelter spaces may include public spaces, pop up or modular structures in compliance with U.S. Department of Housing and Urban Development (HUD) guidance. (Adapted from Michigan State).</i></p>

Required ESG Written Standard	ESG-CV Addendum Language—Sample Written Standard
<p>Standard policies and procedures for evaluating individuals’ and families’ eligibility for assistance under ESG.</p>	<p>Coordinated entry systems (CES) may consider modifying and expediting the <i>assessment, scoring, and eligibility determinations</i> to prioritize those at high risk for severe illness from COVID-19 for shelter and housing. Coordinated entry modifications must be consistent with fair housing and nondiscrimination requirements.</p> <p>Sample Language:</p> <p><i>In collaboration with the local Healthcare for the Homeless, the jurisdiction has streamlined and updated the CES Assessment to include COVID-19 vulnerabilities outlined in the state protective health order which established non-congregate shelters (NCS) for people experiencing homelessness. This assessment will be used for housing placement during the pandemic.</i></p>
<p>Standards for targeting and providing essential services related to street outreach.</p>	<p>If standards for providing street outreach have been updated or modified locally, document those changes and ensure that they are developed in coordination with public health partners. A sample alternative street outreach activity could include:</p> <ul style="list-style-type: none"> • Distribution of masks or other PPE, if available, to people who are unsheltered. • Provision of handwashing stations and portable bathrooms. • Maintaining social distancing requirements during engagement. <p>Sample language:</p> <p><i>“HUD has approved the following as eligible costs under street outreach:</i></p> <ul style="list-style-type: none"> • <i>Engagement: Hand sanitizer, soap, tissue packets, masks, disposable gloves, other PPE.</i> • <i>Case Management: Coordinating medical care.</i> • <i>Transportation: Train or bus tokens, taxi or rideshare for program participants’ travel to and from medical care.</i> • <i>Expanded Staffing: Hiring additional staff to support infectious disease preparedness, providing hazard pay to staff with direct participant contact,”¹ (From Michigan State.)</i>

¹ [Michigan](#) State Housing Development Authority ESG-CV Notice of Funding Availability (NOFA)

Required ESG Written Standard	ESG-CV Addendum Language—Sample Written Standard
<p>Policies and procedures for admission, diversion, referral, and discharge by emergency shelters assisted under ESG, including standards regarding the length of stay, if any, and safeguards to meet the safety and shelter needs of special populations (e.g., victims of domestic violence, sexual assault, and stalking) and individuals and families who have the highest barriers to housing and are likely to be homeless the longest.</p>	<p>Emergency shelters are a vital, life-saving resource that play a key role in communities’ COVID-19 responses. Recipients may choose to establish basic policies ensuring that shelters maintain operations and remain accessible to people experiencing homelessness who are particularly vulnerable to adverse health outcomes related to COVID-19 infection.</p> <p>Sample Language:</p> <p><i>Shelters funded by ESG-CV may not turn away eligible program participants and must establish referral pathways to other shelter or housing if the shelter is at maximum capacity. Shelters must establish referral pathways to isolation and quarantine if a client is in need of such services.</i></p> <p><i>Someone who presents at an ESG-funded shelter with respiratory symptoms (e.g., cough) should not be turned away solely because of their health symptoms.</i></p> <p><i>Shelters funded by ESG-CV are strongly discouraged from implementing a maximum length of stay when a discharge will result in program participants returning to unsheltered settings or situations putting them at a higher risk of COVID-19 infection.</i></p> <p><i>Any ESG-funded shelter that is considering closing or not accepting new residents must immediately notify the local CoC, public health authority, and emergency management officials.</i></p>
<p>Policies and procedures for assessing, prioritizing, and reassessing individuals’ and families’ needs for essential services related to emergency shelter.</p>	<p>During COVID-19, jurisdictions may consider changing assessment or prioritization to include COVID-19 vulnerabilities such as age, specific health conditions, and/or medical frailty.</p> <p>Sample Language:</p> <p><i>"Under this state of emergency, HUD supports communities considering other prioritization elements as necessary to prevent the spread of COVID-19 among those who are homeless or at risk of homelessness and to respond to those already impacted by the pandemic."² (From Michigan State)</i></p>

² [Michigan](#) State Housing Development Authority ESG-CV NOFA

Required ESG Written Standard	ESG-CV Addendum Language—Sample Written Standard
<p>Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid rehousing (RRH) assistance providers; other homeless assistance providers; and mainstream service and housing providers (see §576.400(b) and (c) for a list of programs with which ESG-funded activities must be coordinated and integrated to the maximum extent practicable).</p>	<p>ESG-CV-specific areas of coordination that may be new and different from regular ESG expectations likely involve the role that public health partners will play in service delivery and access to medical care.</p> <p>Sample Language:</p> <p><i>The local department of public health is available to conduct testing for people experiencing homelessness at X shelters or at Y locations. ESG-CV funded shelters and outreach programs should encourage (but may not require) people experiencing homelessness to get tested if they are experiencing COVID-19 symptoms.</i></p> <p><i>Shelters in the jurisdiction are encouraged to use funds provided through ESG-CV to purchase technology to access telehealth services provided through Healthcare for the Homeless.</i></p>
<p>Policies and procedures for determining and prioritizing which eligible families and individuals will receive homelessness prevention assistance and which eligible families and individuals will receive RRH assistance.</p>	<p>States and jurisdictions may update prioritization policies to house people at severe risk of contracting COVID-19.</p> <p>Sample language:</p> <p><i>Local jurisdictions may prioritize the use of ESG-CV funds for proven strategies, especially RRH for those experiencing homelessness. Note: people cannot be denied RRH because of zero income.”³ (From Michigan State.)</i></p> <p><i>Targeted Prevention: Based on race equity analysis, the jurisdiction will target prevention services to three marginalized areas of town (identify three areas). These three areas of town serve disproportionately large communities of Black, Indigenous, and people of color who experience homelessness. They have been historically underserved and had poor access to permanent housing solutions offered by the homeless response system.</i></p> <p><i>The CES will prioritize placement in ESG-CV-funded RRH programs for people who meet the state’s protective health order that provides non congregate shelter to protect people experiencing homelessness from becoming seriously ill from COVID-19. The protective health order outlines a variety of eligibility factors for non-congregate shelter. Validation of priority status must be obtained from the NCS operator.</i></p>

³ [Michigan](#) State Housing Development Authority ESG-CV NOFA

Required ESG Written Standard	ESG-CV Addendum Language—Sample Written Standard
<p>Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or RRH assistance.</p>	<p>States and jurisdictions may consider updating written standards in this area to provide opportunities to address the economic impact of COVID-19.</p> <p>Sample language:</p> <p><i>Under the Coronavirus Aid, Relief, and Economic Security (CARES) Act ESG-CV funding, there will be no rental payment requirement for households receiving financial assistance.</i></p> <p><i>Projects funded are expected to serve people with zero income.</i></p>
<p>Standards for determining how long a particular program participant will be provided with rental assistance and whether and how the amount of that assistance will be adjusted over time.</p>	<p>States and jurisdictions may consider updating written standards in this area to provide opportunities to address the economic impact of COVID-19.</p> <p>Sample Language:</p> <p><i>The CARES Act provides that ESG-CV funds may be used to mitigate the economic impact of COVID-19. Programs are encouraged to consider the maximum number of rental assistance months be extended/adjusted to address unemployment, loss of income, or benefits due to COVID-19.</i></p> <p><i>RRH sub-recipients must use a progressive engagement model; this practice supports using the least intensive intervention to help resolve homelessness for the individual or family. Providers are to add more assistance only as necessary if the less intensive intervention is unsuccessful. RRH households receiving rental assistance subsidies must contribute a minimum of 30 percent of their monthly adjusted income toward their monthly rent. This tenant rent contribution may be adjusted at any time based on changes to household income. There is no minimum rent requirement and tenant rent contribution may be zero for households with no income.</i></p>

Required ESG Written Standard	ESG-CV Addendum Language—Sample Written Standard
<p>Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide to a program participant, including the limits (if any) on the homelessness prevention or RRH assistance that each program participant may receive (such as the maximum amount of assistance, maximum number of months the program participant may receive assistance, or the maximum number of times the program participant may receive assistance).</p>	<p>States and jurisdictions may consider updating written standards in this area to provide opportunities to address the economic impact of COVID-19.</p> <p>Sample Language:</p> <p><i>"ESG-CV funds may be used to provide housing relocation and stabilization services and short- and/or medium-term rental assistance necessary to prevent an individual or family from moving into an emergency shelter or another place described in paragraph (1) of the 'homeless' definition in 24 CFR 576.2. This assistance, referred to as homelessness prevention, may be provided to individuals and families who meet the criteria under the 'at risk of homelessness' definition, or who meet the criteria in the 'homeless' definition at 24 CFR 576.2 and have an annual income below 50 percent of median family income for the area, as determined by HUD. The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in the program participant's current permanent housing or move into other permanent housing and achieve stability in that housing. Homelessness prevention must be provided in accordance with the housing relocation and stabilization services requirements in 24 CFR 576.105, the short- and medium-term rental assistance requirements in 24 CFR 576.106, and the written standards and procedures established under 24 CFR 576.400."</i>⁴ (Sample from South Carolina.)</p> <p><i>Landlord Incentives: ESG-CV funds may be used to pay for landlord incentives that are reasonable and necessary to obtain housing for individuals and families experiencing homelessness and at risk of homelessness. Landlord incentives may not exceed three times the rent charged for the unit. Eligible landlord incentives include:</i></p> <ul style="list-style-type: none"> • <i>Signing bonuses equal to 2 months of rent.</i> • <i>Security deposits equal to up to three months of rent, or the state statute.</i> • <i>Costs 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.</i> • <i>Paying the costs of extra cleaning or maintenance of a program participant's unit or appliances.</i>

⁴ [South Carolina Department of Administration ESG-CV-CV Handbook](#)