

# Street Outreach Policy



### I. Introduction

The Emergency Solutions Grant (ESG) Program is a federal program operated by the U.S. Department of Housing and Urban Development (HUD) to make grants to states, local governments, and territories for the purposes of funding activities that directly serve people experiencing homelessness, including people at risk of homelessness. The California Department of Housing and Community Development (CA HCD) is a direct recipient of ESG from HUD. CA HCD administers an annual allocation of ESG and an additional one-time allocation of ESG made available under the CARES Act.

Street Outreach (ESG-SO) is one of several components (i.e. project types) that can be funded by ESG. Per 24 CFR Part 576, also referred to as the “ESG Program Interim Rule”:

[ESG-SO] funds may be used for costs of providing essential services necessary to reach out to unsheltered homeless people; connect them with emergency shelter, housing, or critical services; and provide urgent, non-facility-based care to unsheltered homeless people who are unwilling or unable to access emergency shelter, housing, or an appropriate health facility. For the purposes of [ESG-SO], the term “unsheltered homeless people” means individuals and families who qualify as homeless under paragraph (1)(i) of the “homeless” definition [...which includes but is not limited to living on the streets, in a park, or in another place not meant for human habitation].<sup>1</sup>

For the purposes of this document, “annual ESG” refers to CA HCD’s annual allocation of ESG, “ESG-CV” refers to CA HCD’s one-time allocation of CARES Act ESG, and “ESG” refers to the program in general and to aspects of the program that apply to both annual ESG and ESG-CV. This ESG Street Outreach Policy (the “Policy”) provides the structure under which organizations receiving certain ESG grants from CA HCD (“subrecipients”) can create and implement ESG-SO projects.

#### A. Applicability

This Policy applies to ESG grants funded using:

- Annual ESG
- ESG-CV

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<sup>1</sup> 24 CFR 576.101, “Street outreach component”

## Project Requirements

### A. Overview

ESG-SO can serve an essential role in providing human-centered services to engage people experiencing unsheltered homelessness and connect them with appropriate resources to obtain permanent housing. The requirements in this Policy are intended to ensure that subrecipients create ESG-SO projects that:

- Comply with all applicable federal laws, statutes, and regulations
- Provide assistance that is tailored to each participant's specific needs and housing barriers
- Implement best practices for meeting people experiencing unsheltered homelessness where they are and connecting them to housing resources in a person-centered way that is tailored and paced for each individual or household

### B. Applicability of Federal Requirements

Projects are required to adhere to all applicable federal laws, statutes, and regulations, which include but are not limited to the ESG Program Interim Rule (24 CFR Part 57) and the Uniform Administrative Requirements, Cost Principles, and Audit Requirements for Federal Awards (2 CFR part 200). Elements of these requirements are incorporated into this Policy; however, subrecipients are strongly encouraged to independently review all applicable requirements independent of this document.

### C. Written Policies and Procedures

Projects are required to develop and implement written policies and procedures (P&Ps) that fully detail their ESG-SO operations. At a minimum, they must include the following content pieces:

- a. **Written Standards.** All elements of the P&P must be consistent with the ESG Written Standards implemented by CA HCD and CA HCD's local subrecipient and with the CoC Written Standards implemented by the local CoC. ESG-SO projects must comply with Written Standards via both the P&P and project implementation. When a conflict occurs between ESG and CoC Written Standards documents, subrecipients must consult with CA HCD to resolve the conflict.

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- b. **Coverage area.** The P&P must describe where street outreach services will be provided, including but not limited to:
  - i. The extent to which they are mobile, site-based, or both
  - ii. The geographic areas served
  - iii. How the project will ensure it reaches the people experiencing unsheltered homelessness in its geographic area and target population who are least likely to request services
- c. **Coordinated Entry integration.** The P&P must detail how the street outreach project will participate in the local Coordinated Entry System to ensure that participants are connected quickly to the resources available via Coordinated Entry, including but not limited to ESG-funded permanent housing.
- d. **Participant eligibility.** The P&P must detail how it establishes and documents participant eligibility. The P&P must also acknowledge that, as required by the ESG Program Interim Rule, lack of third-party documentation must not be a barrier to enrollment in ESG-SO projects.
- e. **Suite of services.** The P&P must define:
  - i. The full suite of services that will be provided by the project, which may only include activities eligible for ESG-SO projects as stated below in sections IV.B and IV.B of this Policy
  - ii. The project's process for assessing each participant's individual strengths and housing barriers, then developing an individualized case management plan that incorporates those strengths and housing barriers to quickly return the participant to safe, stable permanent housing
- f. **Staffing pattern.** The P&P must detail the project's staffing pattern, including:
  - i. Estimated size of outreach staff and associated job duties
  - ii. A process for entering participant data into and maintaining participant data in the local Homeless Management Information System (HMIS) in an accurate and timely manner.<sup>2</sup> For further guidance specific to CA HCD ESG projects use of HMIS, please see the [HUD ESG HMIS Manual](#).

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<sup>2</sup>Subrecipients should contact their local CoC for information about the local HMIS, including user access and training, data standards and requirements, and technical support. Subrecipients must comply with the local CoC standards for timeliness and data accuracy. In the absence of local standards, subrecipients may define "timely manner" at their discretion but are strongly encouraged to adopt policies that require new data to be entered into HMIS as, soon as possible but no more than five business days after it is collected, including entry and exit dates/assessments.

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- g. **Housing problem-solving.** The P&P must detail how the project will provide the following housing problem-solving (HPS) approaches. HPS, including standard interventions and recordkeeping requirements, is defined more fully in CA HCD's ESG Housing Problem-Solving Policy. ESG-SO projects are required to provide the following HPS services:
- i. *Diversion:* the project must attempt to provide diversion services to all participants who either (a) will experience their first night of unsheltered homelessness on the night of contact or (b) are experiencing unsheltered homelessness but have not yet received diversion or rapid exit services
  - ii. *Rapid exit:* the project must attempt provide rapid exit services to all participants who are experiencing unsheltered homelessness and who are not already receiving rapid exit services from another project or provider.  
*Note:* the project should continue to attempt to provide rapid exit services to each participant until both project and participant mutually agree that the participant will no longer benefit from them
- h. **Other requirements.** The P&P must meet any other requirements in documents other than this Policy. Other sources of requirements may include but are not limited to federal laws, statutes, and regulations, CA HCD policy regarding federal awards generally and the ESG Program specifically, and the local CoC.
- i. In the event of a conflict between requirements in this Policy and another document, or between this Policy and another applicable body of policy, subrecipients must consult CA HCD to resolve the conflict.
- i. **General operations.** In addition to the other requirements in this Policy, the P&P must provide sufficient information about the operations of the project that a person not familiar with the project could reasonably reconstruct it from the P&P.

### D. Coordinated Entry

Projects are required to participate to the maximum extent possible in the Coordinated Entry process for their local CoC or CoCs, as Coordinated Entry provides a critical path from homelessness to housing for many people experiencing unsheltered homelessness. Projects are strongly encouraged to consult with their local CoC or CoCs early in the project design process to ensure they maximize their Coordinated Entry integration.

## E. Termination and Appeals

Projects are required to develop a termination and appeals policy. This policy must comply with all requirements in 24 CFR 576.402, “Terminating Assistance,” which includes but is not limited to a provision that participants’ assistance be terminated only in the most severe cases. This policy must also comply with any additional applicable requirements, which can most commonly be found in the following places:

- The project’s application to CA HCD and CA HCD’s grant award or contract for the project
- ESG Written Standards developed by CA HCD or its local direct subrecipient
- CoC Written Standards developed by the local CoC insofar as they apply to ESG-SO projects

## III. Participant Eligibility

### A. Initial Eligibility

Eligible participants are people experiencing unsheltered homelessness, which means households (i.e. an individual or family) who has a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including but not limited to a car, park, abandoned building, bus or train station, airport, or camping ground.

### B. Continuing Case Management and Other Services

The nature of effective street outreach is creating meaningful relationships between the street outreach worker and the client. This relationship is essential to improving housing stability from literal street homelessness into emergency shelter or rapid re-housing. Effective street outreach includes a warm hand-off to housing and other services providers.

As such, there are instances when an ESG-SO project may temporarily continue to provide services to an ESG-SO participant who has been placed in shelter or housing. For this transition period to be eligible for a given participant, all the following criteria must be met and documented:

- The participant is already enrolled in the ESG-SO project
- The participant reasonably expects that the participant will not remain in shelter, housing, or an institution for an extended period, AND the project reasonably

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expects that the participant will end up sleeping outside or in a place not suitable for human habitation upon exit from the shelter, housing, or institution

- The relationship is needed to maintain the stability of the participant in shelter or housing
- The services being provided by the ESG-SO project are neither unnecessary nor duplicative

In these cases, the ESG-SO project exit date should be the date that the last service is provided to the participant after entering shelter or housing. This transition period cannot exceed 90 days (or less as specified by the subrecipient's written standards or the project's policies and procedures). *Note:* HUD acknowledges that this may result in an overlapping enrollment with ESG-SO and a residential project.

### C. Documentation Requirements

Projects are required to follow the documentation standards in 24 CFR 576.500, "Recordkeeping and Reporting Requirements."

## IV. Activity Eligibility

### A. Overview

Eligible activities for ESG-SO projects are enumerated in the ESG Program Interim Rule. Additional eligible activities specifically designed to prevent, prepare for, and respond to COVID-19 are detailed in ESG-CV Notice CPD-21-08.

### B. Essential Services

Eligible Essential Services activities for all ESG-SO projects are enumerated in the [ESG Program Interim Rule](#) at 24 CFR 576.101. These activities are eligible unless otherwise limited by the specific project's contract with CA HCD.

### C. Additional Eligible Activities Under Notice CPD-21-08

Activities eligible under ESG-CV Notice CPD-21-08, or any superseding notices, can be found on the [HUD Exchange website](#). Subgrantees should refer to this website for the latest information.

These activities are eligible for ESG-SO projects funded with annual ESG from Federal Fiscal Year 2020 or prior, when such funding is specifically used to prevent, prepare for, and respond to COVID-19. These activities are also eligible for ESG-SO projects funded

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with ESG-CV. CA HCD may, at its discretion, limit eligible activities via the subrecipient contract.

Note that eligibility of these activities will expire for annual ESG funding on September 30, 2022, and it will expire for ESG-CV funding on September 30, 2023, unless otherwise specified by HUD and/or CA HCD.

### **D. “Prevent, Prepare, and Respond” Tieback**

Under this Policy, when ESG funds are used to prevent, prepare for, and respond to COVID-19 (PPR), there are certain requirements related to documenting those activities’ relationships to PPR at the activity level (but not the participant level) and in the Integrated Disbursement and Information System (IDIS). More information about those requirements, including sample text for IDIS, for many common activities, can be found in HUD’s [“Homeless System Response: ESG-CV ‘Prevent, Prepare, and Respond’ Tieback Flexibilities Quick Guide.”](#)