

ESG & ESG-CV Office Hours

1/26/2022



How to ask a question...

- Question Format:
 - All questions must be submitted in the chat box
 - Please type your organization and question into the chat box
 - The team will read questions out loud at the end of the presentation and will provide answers if possible throughout the presentation
 - All questions and answers entered into the chat box will be recorded as part of the public record



Agenda

- ESG/ESG-CV Updates
- Office Hours Update
- ESG/ESG-CV Q&A
- Brown Bag Session: ESG Written Standards and Best Practices

ESG Updates

2021 ESG Applications

- Currently under Review
- Award announcements are anticipated in February 2022

2020 ESG (annual) Contracts

- Grantees are **contractually obligated** to submit their first RFF within 120 days of the execution date. Everybody with a 2020 ESG (annual) contract should have submitted their first RFF by now. (**Exhibit A**)
- Grantees are **contractually obligated** to submit at least one RFF every quarter. If you do not, your organization is out of compliance. (**Exhibit A** of your executed contract)
- Do not hold onto your RFFs and submit at the end of the contract period. (out of compliance)
- Please do not submit multiple RFFs at one time. We are receiving 7 – 10 RFFs in one email for processing. Again, please do not 'save' them up. As you reconcile your invoices, prepare the RFF and submit to your ESG Grant Rep.

ESG Updates

Mini-Monitoring (asking for back up documentation) - REMINDER

- You will be asked to provide **backup documentation for 2 expenses** on every RFF/DER submitted
 - **For example**, if you submitted expenses for RRH (rental assistance), you may be asked to submit a copy of the lease, copy of the check to the landlord and/or the intake form.
- Your ESG Grant Rep will send you an email with the identified expenses, RFF# and the type of documentation you are required to submit to them (within 5 business days).
- **This will be part of the workflow process going forward.**

ESG Updates

ESG Team Members:

- Diana Prado
- Giovanni Martinez
- Sarah Theobald
- Tuesday Cool
- Sam Lieu
- Anthony Zepeda

We have realigned our grant management territories. You may have a new ESG Grant Rep.

Please reach out to your Rep or contact us at: ESGNOFA@hcd.ca.gov

ESG-CV Reminders & Updates

- Request for Funds (RFF) for December are due on January 30th.

HCD Office Hours Updates

Upcoming Office Hours topics:

- 1/26/22: ESG Written Standards and Best Practices
- 2/2/22: ESG-CV New Provider Orientation (This session will provide a brief overview of ESG-CV and include an open dialogue discussion to answer all your new provider questions.)
- 2/9/2022: CA HCD ESG-CV Monitoring
- 2/16/22 Housing First Principles

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](#)

ESG Resource Links

[ESG Regulations](#) - (update published April 2017)

[ESG-CV Notice](#)

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](#)

Questions?



Contact Us...

- If you have any further questions, please contact us:
 - Annual ESG – Please reach out to your ESG Representative or ESG@hcd.ca.gov
 - ESG-CV – Please reach out to your Grant Administrator

ESG Written Standards Best Practices

- Chris Pitcher
- Erica Snyder





ESG-CV Written Standards

- All recipients and subrecipients who receive ESG-CV funds are required to establish and consistently apply Written Standards for providing assistance (see [24 CFR 576.400\(e\) of the ESG Interim Rule](#))
- This requirement also extends to ESG-CV funds, Recipients and subrecipients must establish Written Standards on how ESG-CV funds will be used to prevent, prepare and respond to the coronavirus
- CA HCD is updating their Written Standards with general guidelines and subrecipients may adopt these guidelines to their own policies and procedures while adding specific (local resource prioritization, temporary emergency shelter policies) details on how they will administer the ESG-CV funds
 - More information forth coming
- Want to see examples? Check out [this resource](#)



Minimum Elements of Written Standards (24 CFR 576.400(e))

- Standard policies and procedures for evaluating individuals' and families' eligibility for assistance under ESG
- Standards for targeting and providing essential services related to street outreach
- Policies and procedures for admission, diversion, referral and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, 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
- Policies and procedures for assessing, prioritizing, and reassessing individuals' and families' needs for essential services related to emergency shelter
- Policies and procedures for coordination among emergency shelter providers, essential services providers, homelessness prevention, and rapid re-housing 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)
- 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 rapid re-housing assistance
- Standards for determining what percentage or amount of rent and utilities costs each program participant must pay while receiving homelessness prevention or rapid re-housing assistance
- 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
- Standards for determining the type, amount, and duration of housing stabilization and/or relocation services to provide a program participant, including the limits, if any, on the homelessness prevention or rapid re-housing 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



ESG-CV Written Standards

Example:

Minimum Requirement (24 CFR 576.400(e))	Subrecipient Responsibility	Sample Written Standard Language
<p>Policies and procedures for admission, diversion, referral and discharge by emergency shelters assisted under ESG, including standards regarding length of stay, if any, 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</p>	<p>Ensure that there are policies and procedures for special populations (e.g., victims of domestic violence, dating violence, sexual assault, and stalking) as it relates to a COVID-19 response. Example: Ohio Domestic Violence Network program</p> <p>Draft Written Standards for Temporary Emergency Shelter and ensure that they are consistent with Emergency Shelter standards in responding to COVID-19</p> <p>Consult the Shelter Management During an Infectious Disease to determine if Written Standards are in alignment with recommended guidance</p>	<ul style="list-style-type: none">• Programs should not require a negative COVID-19 test for access to shelter and they should not use health status to discriminate in access to programs• Use physical barriers to protect staff who will have interactions with residents with unknown infection status. For example, using a sneeze guard or utilizing a large table to increase distance between staff and residents



ESG-CV Written Standards

If **braiding funds** from multiple sources, Written Standards must include policies and procedures to demonstrate that participants are not receiving a duplication of benefits (establish order of priority, targeted household types, documentation procedures, length of stay for each funding source, etc.)



ESG-CV Written Standards

- There are no new documentation requirements
- Rather, HUD expects documentation and project implementation reflect policies and practices outlined in the subrecipient's Written Standards
- If funding new eligible activities, be sure to identify the appropriate documentation, as well as policies and procedures for each activity
- Subrecipients do not have to document the impact of the coronavirus at the household level



How to Develop Written Standards

If a subrecipient is developing Written Standards for the first time, below is a suggested process:

1. **Draft Written Standards** (reference state Written Standards once available, and if possible, reference HUD System Performance Measures and align with local CoC Written Standards)
2. Schedule a **targeted meeting with key stakeholders** to review draft and hash out details (remember to make this an equitable process!)
3. Publish draft of written standards on website and **request public feedback** prior to finalizing
4. Provide opportunity for stakeholders to **comment on draft Written Standards**
5. **Publish Written Standards** on subrecipient website



Setting Yourself Up for Success

Policies and Procedures (aka Written Standards aka Program Manual aka what else?)

Activity Eligibility



Source: reactiongifs.com



Setting Yourself Up for Success

During monitoring, issues that arise always tie back to the Written Standards

Grantee did not have sufficient policies and procedures to prevent the issue from occurring

OR

Grantee did not follow their policies and procedures

Your documentation and practices must reflect the policies and procedures outlined in your Written Standards

Setting Yourself Up for Success

How to make it right?

If grantee did not have sufficient policies and procedures to prevent the issue from occurring:



Update policies and procedures

If grantee did not follow their policies and procedures:



Staff training



Setting Yourself Up for Success

Examples of what information should be included in your Written Standards.

Requirement	Important Info and Sample Language
Description of projects funded with ESG-CV and how they prevent, prepare for, and respond to the coronavirus	<p>How does each project (RRH, SO,HP, ES, HMIS) address COVID for the identified population?</p> <p>Sample language:</p> <ul style="list-style-type: none">• The agency will that ensure mitigation practices are effectively implemented by collaborating with public health officials in disseminating info• Whenever possible, the agency will move COVID affected clients to locations where they are not at risk of spreading the infection further• All shelters and housing programs have the necessary supplies in stock to maintain a disease-free environment.• Training is provided to all staff on how to safely PPR COVID



Setting Yourself Up for Success

Requirement	Important Info and Sample Language
<p>Description of coordination among ES providers, essential service providers, HP and RRH providers, other homeless assistance provider and mainstream and housing providers</p>	<p>If a subrecipient has set COVID-19 standards for how major parts of the homeless crisis response system coordinate, they should be documented in the Written standards</p> <p>Sample language:</p> <ul style="list-style-type: none">• 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 encourages (but does not require), people experiencing homeless to get tested if they are experiencing symptoms• “x” shelter funded under ESG-CV maintains social distancing requirements established in partnership with public health



Setting Yourself Up for Success

Requirement	Important Info and Sample Language
<p>Describe how agency prevents duplication of benefits</p>	<p>All subrecipients must establish and maintain adequate procedures to prevent any duplication of benefits with ESG-CV funds</p> <p>Reference any checklist, forms, or tools you use to evaluate if the household is receiving assistance from other sources</p> <p>Sample language: Additional sources of financial assistance and services provided to a household must be documented, and a determination must be made that there is no duplication of benefits</p>



Setting Yourself Up for Success

Requirement	Important Info and Sample Language
Description of steps for admission, diversion, referral and discharge from emergency shelters funded with ESG-CV	Subrecipients must include in their written standards: <ul style="list-style-type: none">• Steps for assessing whether a household needs a hotel motel room, ES or should be referred to a TES• What are admission requirements for someone to be eligible for a hotel/motel room, ES or TES?• What triggers a referral locally for these interventions?• For emergency shelter, include length of stay limits if any; if there is a length of stay limit, it should also include the process for requesting extensions• Description of referral pathways to isolation and quarantine if household needs such services



Setting Yourself Up for Success

Requirement	Important Info and Sample Language
<p>Prioritization policy for determining which eligible households will receive homelessness prevention or RRH assistance</p>	<p>Subrecipients may update prioritization policies to house people at severe risk of contracting COVID</p> <p>Sample language:</p> <ul style="list-style-type: none">• Prioritization for RRH is based on households who meet HUDs Category 1 and 4 criteria for homelessness and is prioritized by: 1) households with the longest history of homelessness; and 2) households with the most severe service needs including COVID-19 related needs• Based on equity analysis, the jurisdiction will target prevention services to 3 marginalized areas of town (identify 3 areas)• These 3 areas of town serve disproportionately large communities of BIPOC who are historically underserved and experience homelessness at higher rates

BONUS!



Source: Giphy

Component	Funding Source	Income at Intake	Income at Re-evaluation	Frequency of Re-evaluation - not less than once
RRH	ESG-CV, Annual ESG for all purposes	N/A	at or below 30%	annually
HP	Annual ESG (used for Non-COVID purposes)	Below 30%	at or below 30%	every 3 months
HP	ESG-CV and Annual ESG (used for COVID purposes)	at or below 50%	at or below 50%	every 6 months



Subrecipient Written Standards

- During the monitoring, HCD may evaluate your Written Standards to ensure that it:
 - Meets the regulations outlined in the ESG Interim Rule and ESG-CV Notice
 - Does not impact eligibility for ESG-CV funded programs

- Written Standards are intended to be dynamic!

- Review after Quarter 1 and/or Quarter 2 funding and adjust based on performance factors

ESG Written Standards Best Practices

- Chris Pitcher
- Erica Snyder

