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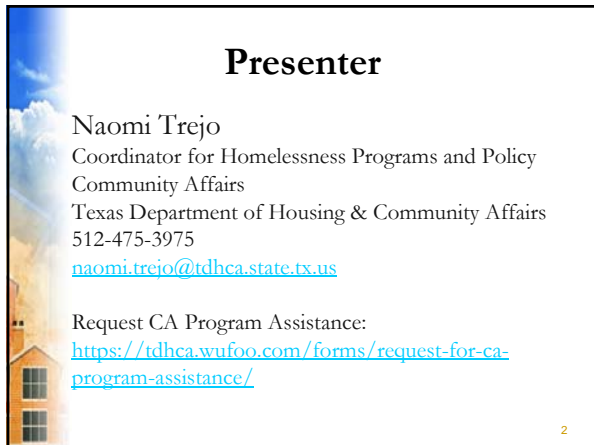
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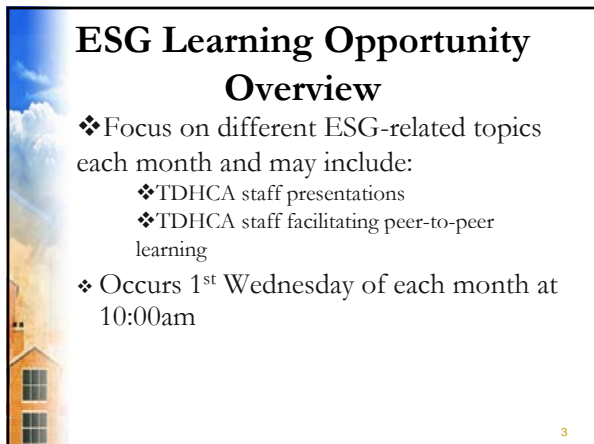
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## ESG Learning Opportunity Overview (2)

- ❖ ESG Learning Opportunities recorded and posted online  
<http://www.tdhca.state.tx.us/community-affairs/esgp/guidance-solutions.htm>
- ❖ Open to ESG Stakeholders on April 6, 2016



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## ESG Learning Opportunity Notice

- ❖ Notice will be sent via email list:  
<http://www.tdhca.state.tx.us>

Hours: M-F 9-5 except for observed holidays

En Español

TDHCA Interactive

Notices of Funding Availability

Join Our Email List

TDHCA Public Comment Center

TDHCA Online Forums

File a Complaint

Notice of Rights to Public Information

TDHCA Rules and Regulations

Housing Resource Center

Bond Disclosure



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## Written Standards ESG Learning Opportunity

- ❖ Some key points covered in webinar
  - ❖ Full details at 24 CFR §576.400(e)(2)
- ❖ Policies and procedures that address:
  - ❖ Program participant evaluation
  - ❖ Homeless subpopulations to target
  - ❖ Coordination with community resources
  - ❖ Assistance levels
  - ❖ Housing stability case management
  - ❖ Relocation services
  - ❖ Denials of assistance to program participants



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## Written Standards Review

- ❖ Review written standards regularly and consider:
  - ❖ Provider feedback
  - ❖ Client feedback
  - ❖ Effectiveness of housing and service options
  - ❖ Changes in characteristics of homeless population
  - ❖ Success of ESG subrecipient in meeting goals

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## Written Standards

24 CFR §576.400(e)(2)

**Subrecipients must:**

- ❖ Establish and consistently apply ESG written standards
- ❖ Notify and submit updated standards to TDHCA, if changed throughout the contract period
  - ❖ Do not use updated standards until submitted to TDHCA

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## Why: Written Standards

- ❖ Written standards create community-wide expectations
- ❖ Establish quality control
- ❖ Establish transparency for users and operators
  - ❖ TDHCA will refer to written standards if addressing any complaints by ESG clients

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### Evaluation

24 CFR §576.400(e)(3)(i)

- ❖ Create standard policies and procedures:
  - ❖ For evaluating individuals' and families' eligibility for ESG
  - ❖ To address any eligibility requirements (e.g., disability or subpopulation)
- ❖ Be specific and detailed

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### Evaluation (2)

24 CFR §576.400(e)(3)(i)

- ❖ Reflect:
  - ❖ homeless populations in Continuum of Care
  - ❖ housing and services available
  - ❖ local and nationwide priorities

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### Evaluation – Emergency Shelter

24 CFR §576.400(e)(3)(iii)

- ❖ Describe characteristics of program participants that will be
  - ❖ Admitted
  - ❖ Diverted
  - ❖ Referred
  - ❖ Discharged

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## Evaluation – Emergency Shelter (2)

24 CFR §576.400(e)(3)(iii)

### ❖ Consider:

- ❖ Length of stay
- ❖ Safeguards to secure safety
- ❖ Individuals and families with highest barriers to housing.

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## Targeting

24 CFR §576.400(e)(3)(ii), (iv)

### ❖ Create standards for:

- ❖ Targeting and providing essential services related to street outreach
- ❖ Determining how providers will assess, prioritize, and reassess participant's needs for essential services related to emergency shelter

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## Coordination

24 CFR §576.400(e)(3)(v)

### ❖ Policies and procedures for coordination among:

- ❖ emergency shelter providers,
- ❖ essential service providers,
- ❖ homelessness prevention, and
- ❖ rapid re-housing assistance providers,
- ❖ other homeless assistance providers,
- ❖ and mainstream services and housing providers.

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**Coordination (2)**  
24 CFR §576.400(a)

❖ Coordinate with Continuum of Care (CoCs)

1. Amarillo
2. Austin/Travis County
3. Bryan/College Station/ Brazos Valley
4. El Paso City and County
5. Waco/McLennan County
6. Wichita Falls/Wise, Palo Pinto, Wichita, Archer Counties
7. Houston/Harris County
8. Dallas City and County/Irving
9. San Antonio/Bexar County
10. Fort Worth/Arlington/Tarrant
11. Texas Balance of State

Contact information for CoCs: <http://www.thn.org/resources>

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**Coordination (3)**  
24 CFR §576.400(b)

❖ Coordinate with other homeless service providers:

- ❖ HUD-Veterans Affairs Supportive Housing (VASH)
- ❖ Supportive Services for Veteran Families Program (SSVF)
- ❖ Projects for Assistance in Transition from Homelessness (PATH)

❖ Examples above -- full list at 24 CFR §576.400(b)

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**Coordination (4)**  
24 CFR §576.400(c)

❖ Coordinate with mainstream resources:

- ❖ Public Housing Resources/Section 8
- ❖ Temporary Assistance for Needy Families (TANF) – [www.yourtexasbenefits.com](http://www.yourtexasbenefits.com)

❖ Examples above -- full list at 24 CFR §576.400(c)

❖ TDHCA encourages including your local Community Action Agency & Comprehensive Energy Assistance Provider  
<http://www.tdhca.state.tx.us/texans.htm>

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**Coordination (5)**  
24 CFR §576.401(d)

- ❖ Coordinate with more mainstream resources:
  - ❖ Medicaid – [www.yourtexasbenefits.com](http://www.yourtexasbenefits.com);
  - ❖ Supplemental Nutrition Assistance Program (SNAP)– [www.yourtexasbenefits.com](http://www.yourtexasbenefits.com);
  - ❖ Social Security Disability Income (SSDI); Supplemental Security Income (SSI).
- ❖ Examples above -- full list at 24 CFR §576.401(d)

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**Assistance Levels**  
24 CFR §576.400(e)(3)(vi)

- ❖ Determine which individuals and families will receive:
  - ❖ Rapid re-housing
  - ❖ Homelessness prevention
- ❖ Consider:
  - ❖ Homeless or At-Risk of Homeless Definition
  - ❖ Household composition
  - ❖ Case management determination

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**Assistance Levels (2)**

- ❖ Make sure to include all household members
- ❖ HEARTH Act has unique definition:
  - ❖ Parents with partial or no custody still count their children in the household
  - ❖ Deployed military included

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**Assistance Levels (3)**  
 24 CFR §576.400(e)(3)(vii)-(viii)

- ❖ Policies and Procedures should determine:
  - ❖ Percentage and amount of rent paid by participant
  - ❖ How long participant will receive rental assistance
  - ❖ If and how the amount will be adjusted over time

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**Assistance Levels (4)**  
 24 CFR §576.400(e)(3)(xi)

- ❖ Policy and Procedures should determine:
  - ❖ Amount of assistance (*e.g.*, maximum amount) and
  - ❖ Duration (*e.g.*, number of months, number of times).
- ❖ Break in Service:
  - ❖ Program participant stops receiving assistance one month
  - ❖ After break in service, program participant must reapply for assistance if more assistance is needed.

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**Assistance Levels (5)**  
 24 CFR §576.400(e)(3)(xi)

- ❖ No clear unit size designation:
  - ❖ Federal guidance of 2 persons per bedroom
  - ❖ 3 adults per bedroom Texas Property Code (§92.010)
  - ❖ 24 CFR 576.2 risk of homelessness includes more than 1.5 persons per room
- ❖ Different unit sizes for Homelessness Prevention and Rapid Re-housing
  - ❖ Keep person housed and then address unit size

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**Assistance Levels (6)**  
 24 CFR §576.400(e)(3)(xi)

- ❖ Comparing rents:
  - ❖ Document comparable rents
  - ❖ Specific forms used
  - ❖ Specific data sources

<https://www.hudexchange.info/resources/documents/ESG-Rent-Reasonableness-and-FMR.pdf>

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**Assistance Levels Example 1**  
 24 CFR §576.400(e)(3)(vi)

- ❖ The Smith family has disclosed that they have applied for a Section 8 Housing Choice Voucher. The average wait time for the voucher is 11 months, but the written standards state that the maximum amount of assistance available to any household is six months. The case manager determined the household will not be self-sufficient in six months. If self-sufficiency is a requirement for the household and if the household has no other interim plan (such as searching for tenant-based rental assistance) the client is not eligible.

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**Assistance Levels Example 2**  
 24 CFR §576.400(e)(3)(vi)

- ❖ Two households apply for rapid re-housing. One is a chronically homeless individual and the other has been homeless for two days. Based on priorities set in the written standards, the chronically homeless individual receives rapid re-housing, and the other household receives rapid re-housing if it is available, or is referred to other resources.

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**Assistance Levels Example 3**  
 24 CFR §576.400(e)(3)(vii)-(viii)

- ❖ The Flores household income
  - ❖ \$800 per month
- ❖ The written standards for rapid re-housing:
  - ❖ Households with income higher than \$500 per month must pay 10% of their income in rental assistance.
  - ❖ When income reaches \$2,000/month the assistance is terminated.
- ❖ Rental assistance agreement states:
  - ❖ Flores household pays \$80 toward their rent, which will increase as income increases.
  - ❖ Flores assistance will end when income reaches \$2,000.

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**Assistance Levels Example 4**  
 24 CFR §576.400(e)(3)(vii)-(viii)

- ❖ The Duke head of household had no income for six months but the head of household has found employment.
- ❖ The Duke household asks for one month of rental assistance until they receive their first paycheck.
- ❖ Per written standards, the household qualifies for three months worth of rental assistance based on number of people in the household, assets, and income level.
- ❖ The rental assistance agreement is signed for three months, with a re-evaluation after one month to determine if assistance is still needed.

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**Housing Stability Case Management/Relocation Services**  
 24 CFR §576.400(e)(3)(ix)

- ❖ Type
  - ❖ Negotiation with owners?
  - ❖ Rental application fees?
- ❖ Amount
  - ❖ What are standard costs?
- ❖ Duration
  - ❖ How long receive short-term rent?
  - ❖ Can a client reapply for Homeless Prevention within the same calendar year?

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**Housing Stability Case Management**  
 24 CFR §576.401(e)

- ❖ If participant received rapid re-housing or homelessness prevention, case management must include:
  - ❖ Monthly meetings to assist with housing stability;
  - ❖ Develop a plan for participant to retain permanent housing once ESG assistance ends;
  - ❖ Assist program participants access supportive services for which they may be eligible.
- ❖ Exception for Domestic Violence service providers not to require case management

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**Housing Stability Case Management (2)**  
 24 CFR §576.401(e)

- ❖ Once participant is in housing, housing stability case management can be provided:
  - ❖ Up to 24 additional months per regulation
  - ❖ Up to 12 additional months per TDHCA contracts

<https://www.hudexchange.info/news/snaps-shots-3-esg-requirements-for-case-management-to-help-ensure-housing-stability-rapid-re-housing-and-homelessness-prevention-assistance>

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**Relocation Services – Financial**  
 24 CFR §576.105(a)

- ❖ Rental application fees
  - ❖ Is program participant responsibility?
  - ❖ How many will Subrecipient pay?
- ❖ Security deposits/Last month's rent
  - ❖ When will Subrecipient pay?
  - ❖ Income based? Consideration of employment?
- ❖ Utility deposits/payments
  - ❖ Why would clients receive utility assistance?

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## Relocation Services – Financial (2)

24 CFR §576.105(a)

- ❖ Moving costs
  - ❖ Truck rental
    - ❖ Will a truck be rented if program participant has identified movers?
  - ❖ Moving company
    - ❖ Will moving company be hired if there are more than two bedrooms?
  - ❖ Storage fees (3 months maximum)
    - ❖ Is program participant likely to be housed in less than 3 months?

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## Services Costs

24 CFR §576.105(b)(3)-(5)

- ❖ Mediation
  - ❖ Who are partners for mediation?
- ❖ Legal Services
  - ❖ Who are partners for legal services?
- ❖ Credit Repair
  - ❖ What is criteria for credit repair?

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## What is not eligible?

- ❖ Utility bills?
- ❖ Moving costs?
- ❖ Mediation?
- ❖ More than 3 months worth of assistance?

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**Denials**  
24 CFR §576.402

- ❖ Must include policies and procedures for terminating assistance
- ❖ TDHCA recommends Subrecipients develop a grievance process:
  - ❖ Circumstances in which a household may not qualify or would be denied;
  - ❖ Notification of denial;
  - ❖ A household's right to review their decision of denial; and
  - ❖ Keep grievance and denial documentation.

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**Contact Information**

**TEXAS DEPARTMENT OF HOUSING  
AND COMMUNITY AFFAIRS**

221 E. 11th Street, Austin, TX 78701  
P.O. Box 13941, Austin, TX 78711-3941

Naomi Trejo, Coordinator for Homeless Programs and Policy  
Phone: 512-475-3975  
Email: [naomi.trejo@tdhca.state.tx.us](mailto:naomi.trejo@tdhca.state.tx.us)

Request for CA Program Assistance:  
<https://tdhca.wufoo.com/forms/request-for-ca-program-assistance/>

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