



# ESG & ESG-CV Deep Dive: Rapid Re-Housing



# Learning Objectives

1. Identify all participant eligibility requirements for RRH including the ESG and ESG-CV eligible HUD categories of homelessness
2. Identify all eligible activities and costs for RRH under ESG and ESG-CV, including new ESG-CV activities, as well as relevant HUD recordkeeping and documentation requirements for programmatic and financial activities
3. Understand the differences between TBRA, PBRA, and SBRA and gain strategies for successful implementation
4. Understand allowable uses for annual ESG for COVID-19 response purposes
5. Identify eligibility evaluation criteria that will prevent duplication of benefits
6. Identify and implement practices in high-cost, low-vacancy communities

- Basic principles of RRH
- Eligibility
- Eligible uses (Activity Types) of funds
- ESG-CV uses and requirements
- COVID waivers, flexibilities, and alternative requirements
- Duplication of Benefits



# RRH Basic Principles

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Rapid Rehousing is designed to move people experience homelessness quickly into permanent housing through **housing relocation and stabilization services and short-and/or medium-term rental assistance**

## Foundational Elements

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Time limited rental assistance

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Progressive engagement & housing-focused case management

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Assumes homelessness can be resolved with short term assistance



# RRH Basic Principles

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Rapid Rehousing is a **Housing First** intervention that prioritizes providing permanent housing to people experiencing homelessness, thus ending their homelessness and serving as a platform from which they can pursue personal goals and improve their quality of life

## Foundational Elements

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Rapid placement into permanent housing with minimal barriers

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Wrap around services

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Monthly (minimum) case management

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No treatment, sobriety, income requirements

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Program participants follow terms of standard residential lease agreement

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Participant choice increases likelihood of long-term success



# RRH Basic Principles

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ESG-CV RRH projects adhere to **Equal Access/Non-Discrimination Rule**

## Foundational Elements

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Must have written policies

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People presenting as a “family” are treated as such

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May not use the age or gender of a child under 18 to deny admission

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Projects serving families must serve all types of families with children



# RRH Basic Principles

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ESG and ESG-CV RRH projects must adhere to a set of **written standards** for program operations

## Foundational Element Examples

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Use of progressive engagement

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Rent should not exceed 50% of income

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Define what circumstances inform when to close out case

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All recipients establish policy for maximum rent assistance

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Security deposit limited to 2 months

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Participant eligibility recertified every 90 days

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# RRH Eligibility

## ■ ESG-CV

- Category 1 – Literally Homeless
- Category 4 – DV Survivors
- ESG-CV RRH can be provided to reduce risk of contracting or transmitting the virus to those whose housing is at risk due to economic consequences of public health crisis

## ■ ESG Annual

- Category 1 – Literally Homeless
- Category 4 – DV Survivors





# RRH Activity Types

## ■ Rental Assistance

- Short-term and medium-term rental assistance
- Rental arrears

## ■ Housing Relocation & Stabilization Services

- Financial Assistance
  - Rental application, security deposit, last month's rent, utility deposit, utility payments, moving costs
- Services
  - Housing search and placement, housing stability case management, mediation, legal services, credit repair (expanded *Services* under ESG-CV)

# ESG Housing Search and Placement

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Assessment of barriers, needs, preferences



Development of action plan to locate housing



Housing search



Outreach to and negotiation with owners



Assistance with rental applications and understanding leases



Determine compliance with habitability standards, lead based paint and rent reasonableness



Obtain utilities and arrange move in



ESG Annual limits pre-housing assistance to 30 days; ESG-CV extends to 60 days

# ESG Housing Stability Case Management

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Entry through  
Coordinated Entry  
System



Develop action plan to  
locate housing



Refer for community-  
based services



Coordinate Services



Verify and document  
eligibility



Develop housing and  
services plan to  
maintain housing



Re-evaluate progress



# RRH Eligible Types of Rental Assistance

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## CoC

- Tenant Based ONLY

## ESG-Annual

- Tenant Based
- Project Based

## ESG-CV

- Tenant Based
- Project Based
- Sponsor Based



# Types of Rental Assistance

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- Tenant Based (TBRA)
  - Scattered-site, privately owned rental housing
  - Program participant is lease holder
- Project Based (PBRA)
  - Grant recipient or subrecipient executes lease with property owner
  - Sub-leases one or more units in structure to program participants
- Sponsor Based (SBRA)
  - Recipient owns or leases units
  - Sub-leases one or more units under contract to program participants
  - Can be single structure or scattered site



# ESG-CV Nuances

- Additional Activities
- Flexibilities
- Waived Requirements



# ESG-CV Waivers & Alternative Requirements

- 1. *Emergency Shelter Activities:*** Funds available through 9/30/2022
- 2. *Temporary Emergency Shelter Activities:*** Funds may pay for temporary emergency shelter. May convert temporary emergency shelter into *emergency shelter* without triggering disposition requirements
- 3. *New Eligible Activities:*** Loaning cell phones, laundry services, vaccine incentive payments, renter's insurance, sponsor-based rental assistance, etc.
- 4. *Aligning Eligibility and Re-evaluation Income Limits:*** Income limits of 30% AMI has been raised to 50% AMI



# ESG-CV Waivers & Alternative Requirements

5. ***New Rental Assistance Allowances:*** Project-based rental assistance can cover rent while a new participant prepares to move in
6. ***Program Participant Assistance:*** Program participants may receive up to 24 months of assistance in a 3-year period
7. ***Housing Standards:*** Housing may meet *housing quality standards (HQS)* or *habitability standards*
8. ***Housing Stability Case Management:*** Can assist participants for up to 60 days while they seek housing
9. ***Subaward Funds to Tribes:*** Recipients and Subrecipients may subaward funds to Tribes





# ESG-CV Waivers & Flexibilities

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Match

Match requirement is waived.

FMR

FMR limit is waived. Units must still meet **rent reasonableness standards**.

CoC Consultant

Waived.



# ESG-CV Waivers & Flexibilities

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## Coordination w/ other services

Requirement to coordinate ESG funded activities with other targeted homelessness services is waived.

## Mainstream Systems

Requirement to coordinate ESG funded activities with system and mainstream resources is waived.

## Hotel/Motel Costs

May pay for hotels/motels for

- 1) persons experiencing homelessness;
- 2) households receiving RRH under CoC and ESG;
- 3) households receiving HP under ESG;
- 4) households in PSH.

Can pay for cleaning, damages, repairs.



# ESG-CV Waivers & Flexibilities

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## Extension of RRH Assistance

The maximum amount of rental assistance and services costs (24 months in 3 years) is waived while receiving ESG-CV assistance.

## Procurement

Recipient may deviate from applicable procurement standards when procuring goods to prevent, prepare for, or respond to Coronavirus. Must establish and maintain documentation on alternative procurement standards.

## Citizen Participation

Consultation and citizen participation requirements are waived. Each recipient must publish how it has used and will use its ESG-CV allocation on the Internet at the appropriate government website or electronic media.



# ESG-CV Waivers & Flexibilities

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## Housing Stability Case Management

Participants may be assisted with case management for up to 60 days while the participant seeks housing.

## Environmental Review

Environmental Review requirements are waived for temporary emergency shelters necessary to prevent, prepare for, and respond to coronavirus.

## PBRA

- ✓ Recipient or Sub may pay 100% of rent payment prior to participant move in
- ✓ Recipient or Sub may cover 30 days of rent during turnover
- ✓ Recipient or Sub may require a program agreement w/ participant



# Duplication of Benefits

- DOB Overview
- DOB Applicability
- DOB Analysis

# Overview of Duplication of Benefit

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- A duplication of benefits occurs when a person, household, business, government, or other entity receives financial assistance from multiple sources for the same purpose, and the total assistance received for that purpose is more than the total need for assistance



# Duplication of Benefit Applicability

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- HCD and subrecipients must establish and follow policies and procedures to ensure that DOB does not occur
  - DOB may occur at the activity and beneficiary level
- Policies are applicable to CARES Act funding as well as formula funding used to prevent, prepare for, and respond to coronavirus
- Policies must include:
  - Requirement that any person or entity receiving assistance (including subrecipients and direct beneficiaries) must agree to repay assistance that is determined to be duplicative
  - Method of assessing whether the use of these funds will duplicate financial assistance that is already received or is likely to be received



# Duplication of Benefit Analysis

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1. **Assess Need:** Determine the amount of need (total cost)
2. **Determine Assistance:** Determine the amount of assistance that has or will be provided from all sources to pay for the cost
3. **Calculate Unmet Need:** Determine the amount of assistance already provided compared to the need to determine the maximum ESG-CV award (unmet need)
4. **Document Analysis:** Document calculation and maintain adequate documentation justifying determination of maximum award





# High-Cost Rental Markets Strategies

- Landlord Incentives
  - Signing bonus up to 2 months of rent
  - Security deposit up to 3 months of rent
  - Pay costs to repair damages incurred by program participant and not covered by security deposit
  - Pay costs of extra unit cleaning or maintenance
- Sponsor-Based Rental Assistance
  - ESG-CV Recipient or Subrecipient secures a block of units, protecting landlord from costs and hassle of unit turnover
- Shared Housing



# High-Cost Rental Market Strategies

- Devote necessary staff time to landlord recruitment
- Dedicate housing staff with deep real estate expertise
- Dedicate resources to communication and marketing for aggressive search for housing partners
- Process rent payments quickly; maintain reliable schedule
- Offer a “damage mitigation fund” for unit repairs beyond deposit
- Enlist trusted partners, elected officials, clergy in outreach



# Rapid Rehousing Best Practices

## 1. Housing Identification

- Client choice of location
- Focus on landlord engagement, recruitment, retention (project vs. agency vs. system)
- Specialized project staff dedicated to landlord recruitment and retention
- Formalized partnership with landlord/property management company
- Offer flexible package of landlord incentives based on local market standards



# Rapid Rehousing Best Practices

## 2. Move in and rent assistance

- Progressive assistance with regular recalibration (individualized rather than a “package” of assistance)
- Flexible length and depth of financial assistance
- Avoid “cliff effect” with step down assistance
- Leverage other, local resources for other household needs
- Establish clear work flows for processing financial assistance payments
- Plan for unpredictable but urgent costs
- Track and frequently update current and projected spending



# Rapid Rehousing Best Practices

## 3. Housing-focused Case Management

- Focus on resolving the current crisis, RRH is not an anti-poverty program
- Housing First
- Trauma-informed, strengths-based approach
- Support participant choice
- Provide individualized, flexible, household-specific services
- Closing the case – each participant has a plan for future housing crises



Thank you for listening