


Category:	Housing	INCA Community Services ESG Program Standards 
Sub Category:	Emergency Solutions Grant (ESG) Addendum	
Effective Date:	7/20/20,	
Revised Date:		
Forms:		
Responsible: ESG Staff, Directors, and Fiscal Department		
<h2 style="text-align: center;">Emergency Solutions Grant (ESG) Program Addendum to Requirements Cares Act Waivers</h2>		
Purpose		
<p>Congress passed the Coronavirus Aid, Relief and Economic Security Act (CARES Act) on March 27, 2020. The Act provides Relief funding for the Emergency Solutions Grant Program in order to make available and distribute funds to prevent, prepare for and respond to the coronavirus by supporting additional homeless assistance and homelessness prevention activities. <u>The following waivers have been approved by HUD for the duration of the ESG 2020 Contract period ending September 30, 2021.</u> These waivers are applicable to all areas within the State of Oklahoma which fall under the State's "Non-Entitlement" jurisdiction on the following</p>		
Re-evaluations for Homelessness Prevention Assistance		
<p>The Current Requirement: The ESG regulations at 24 CFR 576.401(b) requires recipients or subrecipients providing homelessness prevention assistance to re-evaluate the program participant's eligibility, and the types and amounts of assistance the program participant needs, not less than once every 3 months.</p> <p>Waiver: The 3-month re-evaluation requirement has been waived for homelessness prevention assistance as specified in 24 CFR 576.401(b) is necessary to help program participants remain stable in housing during the economic uncertainty caused by COVID-19.</p>		
Housing Stability Case Management		
<p>The Current Requirement: Under 24 CFR 576.401(e), the recipients or subrecipients must require Homeless Prevention or Rapid Re-Housing program participants to meet with a case manager not less than once per month to assist them in ensuring long-term housing stability, unless the Violence Against Women Act of 1994 or Family Violence Prevention and Services Act prohibits the recipient or subrecipient from making its shelter or housing conditional on the participant's acceptance of services.</p>		

Waiver: The monthly case management requirement has been waived. This will allow recipients to provide case management on an as needed basis and reduce the possible spread and harm of COVID-19. This waiver is in effect until September 30, 2021.

Guidelines:

- ESG caseworkers will adhere to INCA's COVID-19 guidelines concerning contact with program recipients. Front line staff will refer possible program participants to caseworkers who will make contact by technology including internet, phone, email, text, or other safe manners to complete the application, Housing Stability Plan and other documentation needed.
- Virtual case management and services will be utilized. Casenotes and Housing Stability Plan will be kept on a secure on-line document so caseworkers and other pertinent staff can assist with ensuring services are given as quickly as possible to address the immediate needs during this crisis.
- If in-person contact is required agency COVID-19 safety protocol will be followed.

Restrictions of Rental Assistance to Units with Rent at or Below Fair Market Rent (FMR)

The Current Requirement: Under 24 CFR 576.106(d)(1), rental assistance cannot be provided unless the total rent is equal to or less than the FMR established by HUD, as provided under 24 CFR Part 888, and complies with HUD's standard of rent reasonableness, as established under 24 CFR 982.507. Quickly moving people into permanent housing is especially critical in preventing the spread of COVID-19.

Waiver: The limit on rental assistance to rents that are equal to or less than the FMR, established by HUD, has been waived. This will assist recipients and subrecipients in more quickly locating additional units to house individuals and families experiencing homelessness. The FMR restriction is waived for any individual or family receiving Rapid Re-housing or Homelessness Prevention assistance who executes a lease for a unit before September 30, 2021.

Homeless Definition - Temporary Stays in Institutions of 90 Days Less

The Current Requirement: Under 24 CFR 576.2 under paragraph (1) (iii) an individual or family who lacks a fixed, regular, and adequate nighttime residence includes exiting an institution where (s)he has resided for 90 days or less and who resided in an emergency shelter or place not meant for human habitation immediately before entering that institution.

Waiver: An individual may qualify as homeless under paragraph (1) (iii) the homeless definition in 24 CFR 576.2 so long as he or she is exiting in an institution where they resided for 120 days or less and resided in an emergency shelter or place not meant for human habitation immediately before entering that institution. This waiver is in effect until September 30, 2021.

Changes in ESG during COVID Pandemic (effective 7/20).

- INCA will offer medium term case management assistance, for three months with potential for additional assistance dependent on need, and will use the first come first serve priority system (based on Southeastern Oklahoma Continuum of Care guidance) to prioritize eligible families and individuals receiving services based on COVID-19 related needs. Program participants will work and communicate closely with program staff to determine improvement in situation and/or self-sufficiency barriers.
- Months 1-3: INCA will pay 100% rental and utility costs; security deposit equal to no more

than two months' rent; and utility deposits and arrears.

- After 3 months, options to assist further up to 6 months, will be offered based on need evaluation, and approval of the Executive Director.

Dissemination of Policy

The policy will be made available to all employees through the agency's website. The agency will educate and train employees and supervisors regarding the policy and any conduct that could constitute a violation of the policy.