

**Harris County
Emergency Solutions Grants Program
Written Standards**

I. Introduction

Harris County has developed the following standards for providing assistance with Emergency Solutions Grants (ESG) funds as required by 24 CFR 576.400 (e). These are initial standards that have been created in coordination with the Houston/Harris County Continuum of Care which includes Harris County, the City of Houston, Fort Bend County and the City of Pasadena.

These standards represent goals for providing services for the community and the entire continuum, though the Harris County expects that the standards will become more expansive as the Harris County gains more experience with and collects more data from services provided with the Emergency Solutions Grants program. These standards are in accordance with the interim rule for the Emergency Solutions Grants Program released by the U.S. Department of Housing and Urban Development on December 4, 2011 and the final rule for the definition of homelessness also released by the U.S. Department of Housing and Urban Development on December 4, 2011.

II. Evaluating eligibility for families and individuals

Intake and Assessment

Case managers will use the Continuum wide assessment tool to review client situation, understand eligibility and begin the process of determining length of assistance. Any client assessed for potential assistance with ESG funds must meet the criteria to become eligible for homelessness prevention or rapid re-housing assistance. Any new client entering into shelter must also undergo a complete assessment to understand client needs and barriers and match the client to the most appropriate services provider. The following outlines the individual characteristics of clients qualifying for homelessness prevention or rapid re-housing.

Homelessness Prevention

Any client receiving assistance must have proof of residence within the Harris County service area.

Total household income must be below 30 percent of Area Family Income (AFI) for the area at initial assessment. Clients must provide documentation of household income, including documentation of unemployment and a zero income affidavit for clients without income.

All clients must meet the following HUD criteria for defining at risk of homelessness for individuals or families, unaccompanied children and youth or families with children and youth where youth are defined as up to age 25:

- Has moved because of economic reasons 2 or more times during the 60 days immediately preceding application for assistance (Individuals and Families)
- Is living in the home of another because of economic hardship (Individuals and Families)

- Has been notified that their right to occupy their current housing or living situations will be terminated within 21 days after the date of application for assistance (Individuals and Families)
- Lives in a hotel or motel and the cost is not paid for by charitable organizations or by Federal, State, or local government programs for low-income individuals (Individuals and Families)
- Lives in an SRO or efficiency apartment unit in which there reside more than 2 persons or lives in a larger housing unit in which there reside more than one and a half persons per room (Individuals and Families)
- Is exiting a publicly funded institution or system of care (Individuals and Families)
- Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in Harris County's approved Con Plan (Individuals and Families)
- A child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute (Unaccompanied children and youth)
- An unaccompanied youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under section 725(2) of the McKinney-Vento Homeless Assistance Act, and the parent(s) or guardian(s) or that child or youth if living with him or her. (Families with children and youth)

Individuals who fall under the HUD Category 2 or 3 for Homelessness also qualify for homelessness prevention assistance. Like those that fall under the At-Risk of Homelessness definition, clients must also live in the service area and qualify by income. The categories are listed below:

Category 2 – Imminent risk of homelessness is an individual or family who will imminently lose their primary nighttime residence, provided that:

- Residence will be lost within 14 days of the date of application for homeless assistance;
- No subsequent residence has been identified; and
- The individual or family lacks the resources or support networks needed to obtain other permanent housing

Category 3 – Homeless under another federal statute includes unaccompanied youth under the age of 25 or families with children and youth, who do not otherwise qualify as under this definition but who:

- Are defined as homeless under another federal statute child or youth who does not qualify as homeless under the homeless definition, but qualifies as homeless under another Federal statute
- Have not had a lease, ownership interest, or occupancy agreement in permanent housing during the 60 days prior to the homeless assistance application;
- Have experienced persistent instability as measured by two moves or more during the preceding 60 days; and

- Can be expected to continue in such status for an extended period of time due to special needs or barriers.

Rapid Re-housing

Any client receiving rapid re-housing assistance must meet the HUD criteria for determining homelessness as either literally homeless, or fleeing/attempting to flee domestic violence. The four categories are listed below:

Category 1 – Literally homeless is an individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:

- Has a primary nighttime residence that is a public or private place not meant for human habitation;
- Is living in a publicly or privately operated shelter designated to provide temporary living arrangements (including congregate shelters, transitional housing, and hotels and motels paid for by charitable organizations or by federal, state and local government programs); or
- Is 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

Category 4 – Fleeing domestic violence includes any individual or family who:

- Is fleeing, or is attempting to flee, domestic violence
- Has no other residence; and
- Lacks the resources or support networks to obtain other permanent housing

Shelter Clients

Homeless clients entering into the shelter system must meet the HUD criteria for homelessness as either literally homeless, at imminent risk of homelessness, homeless under another federal statute, or fleeing/attempting to flee domestic violence. Clients will be prioritized within the emergency shelter system based on need, available resources and geographic area.

III. Coordinating services

Coordination among providers

All ESG subrecipients (shelter, homelessness prevention and rapid re-housing providers) within the Houston/Harris County Continuum of Care service area are expected to work collaboratively to coordinate funding that addresses the needs of the entire continuum. To achieve these goals, Harris County requires that all subrecipient service providers will:

- Participate in a coordinated assessment system, where client entry into the entire system can begin at any point. Service providers will use a common assessment tool that will allow providers to enter data on a client and provide transfer information when a client fits the services of another provider, without having to engage in another assessment. Reasons for client transfer can include better fit in a specialized program, the correct geographic service area, and available resources within the community.

- Establish a staff member as a point of contact for other case managers and members of the service provider continuum of care. The contact should be a position that sees little turnover and is familiar with organizational resources and up to date on current organizational capacity to accept and serve clients, such as a supervisor or manager. This contact should be able to provide information for other housing case managers on what current programs and resources are available to clients entering into the provider system through their organization. This contact will reduce or eliminate the need for clients to seek out additional assistance based on referrals from any ESG recipient agency.
- Attend all coordinated training for case managers within the homeless provider system. Each subrecipient is expected to send at least one staff member and share all lessons learned with all housing case management staff. Harris County, in collaboration with the Coalition for the Homeless Houston/Harris County, the City of Houston, Fort Bend County and the City of Pasadena, will coordinate training for ESG staff so that case clients within the region are receiving the same quality of service across providers. The members of the Continuum will also host regular meetings of subrecipient program staff to share best practices and engage in collective problem solving as the community works toward an integrated system for clients. Meetings will be facilitated by Coalition for the Homeless of Houston/Harris County staff.

Mainstream and targeted homeless providers

To encourage the coordination of existing services while limiting duplication of services and overlapping federally funded programs, Harris County, with the Coalition for the Homeless for Houston/Harris County and both mainstream and targeted homelessness service providers will execute Memorandums of Understanding (MOUs) to streamline entry into programs and increase access to such services. The MOUs will vary from setting aside spots within other programs for ESG clients to providing direct access to and eliminating the need for reassessment into other programs. The current MOUs between Harris County, the Coalition and service providers are included in this document as Appendix I.

IV. Client prioritization

Harris County will use a shared assessment form that will target those clients with the most barriers to housing. Each barrier will have an allotment of points, and the higher score (and more barriers) the more likely the client will receive services. The assessment of barriers is based on an objective review of each client's current situation using the tool rather than the subjective opinion of a case manager assessing each client's needs. All clients must have a minimum score of 20 to receive assistance.

Homelessness prevention

Harris County prioritizes clients who are currently in their own housing, especially families with young children who have limited housing options but high needs for homelessness prevention funding.

Rapid re-housing

Harris County anticipates targeting formerly incarcerated individuals and families as the most likely recipients for rapid re-housing assistance.

V. Participant share

Harris County will not have a minimum amount or percentage that will be applied to client contributions across all service providers. In addition, Harris County will not allow providers to create a minimum participation amount for clients upon entry into any homelessness prevention or rapid re-housing program. Clients will be required to contribute a portion of their income in addition to their assistance once the client income has increased during program participation.

Once clients have an increase in income (access to additional resources, new or higher paying job within the household, etc.), Harris County subrecipients must allow a client to receive three months of the increased income before requiring client contributions, as long as the period of service fits within the 24 month cap for assistance. Once clients have earned three months of additional income, on the fourth month the client is expected to contribute five percent of the cost of living expenses (rent and utilities, if both are being covered) for which they are receiving assistance. Clients may request a hardship waiver, through their case manager, to forgo the contribution that month. All hardship waivers must be reviewed and approved by a case management supervisor. If a client receives a hardship waiver, each month their situation will be reevaluated to begin contributions at five percent. Contributions will continue to increase by five percent each month but cannot exceed 30 percent of the client's adjusted monthly income. Clients may request a hardship waiver at any time, and will be asked to contribute at the amount for which the waiver was originally requested.

Duration and amount of assistance

Harris County policy is that no provider may create limits for the amount of assistance that will be provided to clients. All subrecipients are expected to provide support to clients for the full time necessary to stabilize that client and provide for the likelihood of positive housing outcomes after assistance. Harris County will not permit subrecipients to set their own maximum standards for assistance, recognizing that the amount of assistance and duration of assistance can vary substantially among clients. All case managers are required to re-evaluate clients based on the following schedule. At that time, a case manager may decide to extend, decrease or discontinue providing assistance.

Homelessness Prevention clients must have reassessments at a minimum every 3 months. To continue to receive assistance, clients must be at or below 30 % AFI.

Rapid Re-Housing clients must have reassessments at least annually, though case managers will be required to have regular home and office visits with clients, as described in the duration and amounts section.

A client is eligible to receive assistance up to the full 24 months in a 3 year period as determined by the certification process required for all ESG clients. Harris County anticipates very few clients will need or be eligible to receive this level of assistance. It is the case manager's responsibility to document client need and ensure that ESG is the most appropriate assistance for this client.

Harris County and all members of the Houston/Harris County continuum intend to update and refine the process once HMIS has more robust data specifically for ESG clients.

Duration and amount of Housing Stabilization and/or Relocation Services

Harris County will not allow ESG funds to be used for credit repair and legal services to be eligible activities. Harris County has found limited access to this resource by clients and providers and will instead encourage the use mainstream service providers and establish them as part of the system of providers with formal relationship.

Any subrecipient of ESG assistance must provide housing location assistance for clients as a part of its full housing relocation and stabilization services to ESG clients. Subrecipients are expected to have at least one staff member dedicated to finding appropriate housing and developing relationships with affordable housing providers so that ESG clients have access to housing choice through the subrecipient, rather than the expectation that clients must navigate the system on their own.

As part of the requirement for comprehensive case management for housing stability, all case managers are expected to complete, at a minimum, an in-person follow up with clients 30 days after exiting the program. In addition, it is expected that case managers maintain a reasonable case load to be able to provide quality housing case management to each of her or his clients. Housing case managers for rapid re-housing and homelessness prevention clients should carry a case load of 20 – 25 clients. If a case manager is focused solely on very high barrier or chronically homeless clients, the case load should not exceed 15 clients. These ratios ensure that case managers are able to give quality housing case management to address the needs of their clients and provide the level of service expected of ESG funded housing case managers.

For programs providing rapid re-housing assistance to clients with high barriers and mental illness and/or substance abuse, Harris County requires that case managers must conduct home visits at least bi-weekly for the first three months receiving assistance. Homelessness prevention clients must have an initial home visit when first approved for assistance and subsequent house visits with each recertification every three months. It is expected that case managers will conduct office visits with homelessness prevention clients between home visits, at least once per month. Case managers and program managers are encouraged to provide more than the minimum required services through case management.

Harris County recognizes that high deposits for rental application and initial utility services is often an incentive for providing services or housing to clients with high barriers to housing or who may be seen as a risk. Subrecipients are allowed to include rental and utility deposits as part of the housing relocation and stabilization services. Security deposits can be for up to two months of rent for the client. Deposits may remain with the client if they are stably housed once the subrecipient has completed providing assistance. If a client leaves a program before completing assistance or leaves their housing prior to completing case management, the subrecipient must track and return the deposit.

Harris County expects all case managers and housing specialists to work closely with housing providers and establish trusting relationships among landlords in a way that will encourage property owners and managers to wave application fees for rental properties. Recognizing that this will not always be possible, application fees can be included as a housing relocation cost, so long as the client is only completing one application at a time. Harris County will not fund the fees for multiple applications simultaneously.

Appendix I - MOUs