Homelessness Grant Program Guidance 1.0

Purpose

BACKGROUND

This programmatic guidance document is designed to assist Continuums of Care (CoCs) in effectively implementing various homelessness grant programs distributed by the Office on Homelessness, ensuring compliance with state, federal, and contract requirements.

Note: Nothing contained in this guidance overrules or changes Contract terms. The Contract remains
the sole source for legal guidance.

For all grant programs, please see reference-guide-for-state-expenditures.pdf (myfloridacfo.com)

Challenge and Challenge Plus Programmatic Guidance

OVERVIEW

The CoC may use the grant funds to fund any activity or project that is clearly and specifically identified in the written CoC Plan. The Plan should be sufficiently detailed to clearly denote the activity or project use. If the project is NOT included in the Plan, the CoC must submit an amendment to the Plan, detailing the project to be included.

The services and housing funded through the grant must be implemented through the continuum of care's coordinated entry system as provided in s. 420.6225(5)(b) and must be designed to assess and refer persons seeking assistance to the appropriate housing intervention and service provider. All grant funds shall go to activities that directly benefit homeless persons or persons at-risk of homelessness. Activities that do not directly benefit homeless persons may include, but are not limited to, public education, training, planning, and capacity building. Homeless Management Information Systems (HMIS) may be claimed to be a direct benefit used only to the extent that the system is used as a case management tool to coordinate services among two or more local agencies serving the homeless person.

The CoC's Plan must be filed with the Office on Homelessness. The plan may be the HUD Consolidated Plan, the local Annual Action Plan, or any plan that the CoC helped draft that addresses the homelessness needs in the specific area (including the activity to be funded). The CoC shall be fiscally responsible for all grant funds and for ensuring that funds are expended only for eligible activities in accordance with state expenditure guidance specifically relating to agreements for recipients/subrecipients of state or federal financial assistance.

Initiative #1 - Rapid Re-housing through Reunification of Families

This initiative is focused on rapid re-housing and prevention services for families with a primary goal of reunification. Each CoC shall demonstrate linkages with Community-Based Care Organizations (CBC) and ensure families are provided housing support needed for reunification.

Initiative #2 - Employing Targeted Homeless Prevention and Rapid Re-housing Services

In collaboration with the Community-Based Care Organizations (CBCs) and/or Managing Entities (MEs) (depending on the individual), the CoCs shall dedicate housing resources to support Permanent Supportive Housing (PSH) for individuals contending with substance abuse and mental health disorders who may be atrisk of or facing homelessness. Each CoC shall demonstrate linkages with behavioral health and medical providers and ensure the availability of services that include intensive case management, substance abuse and mental health treatment, medication assisted treatment services, mobile response teams, medical services, supportive employment, recovery supports and leveraging technology to deliver telehealth services.

CHALLENGE AND CHALLENGE PLUS ACTIVITIES

Examples of activities to be provided that meet Housing, Program, and Service Needs with Challenge and Challenge Plus funds.

Housing Need

Client Financial Assistance to Prevent or End Homelessness. These activities consist of:

- Short-term rental assistance;
- First/last month rental payments;
- · Security deposits and application fees;
- Mortgage payment assistance;
- Current and past due utility assistance;
- Utility late fees and connection fees;
- Utility deposits;
- Bridge housing;
- Hotel/motel vouchers;
- Inspection costs;
- Moving costs; and
- Minor repairs to homes

Program Need

Emergency Shelter Program Costs. These activities consist of:

- · Beds, pillows, and mattresses;
- Furniture including tables, couches, chairs, and desks;
- Towels and bedding;
- Food;
- Cleaning supplies;



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- Kitchen equipment, supplies, and appliances;
- Renovations;
- Furniture repair;
- Washers and dryers; and
- · Landlines and hotlines for resident use.

Low-income Housing Maintenance.

Costs of Constructing Special Population Housing. These activities consist of:

- Appliances;
- Fire equipment: and
- Plumbing and electrical work.

Miscellaneous Program Operation Costs. These activities consist of:

- Staff salaries and fringe benefits;
- Staff training costs;
- Staff travel costs (i.e., mileage) including those incurred through outreach activities;
- HMIS purchase and maintenance costs, including licenses, user training, data entry, and data mining and reporting costs;
- Tablets and phones for outreach workers;
- Hotspots to conduct out of office assessments, applications, and case notes;
- Vehicle costs including purchase/lease, insurance, and fuel;
- Projector and educational computer station to assist youth with academics;
- Repair funds;
- Portable toilets: and
- Job readiness fund.

Service Need

Case Management Services. These activities consist of:

- Applying for benefits such as food stamps and SSI/SSDI;
- EBT card replacement;
- Accessing healthcare; and
- Employment counseling.

Housing Stabilization Services. These activities consist of:

- Housing search and placement;
- Education on lease contracts;
- Housing stability case management;
- Mediation and advocacy with landlords; and
- · Credit repair.

Life Skills Training. These activities consist of: • Financial management;

- · Conflict resolution;
- Shopping for food and other necessities;
- Nutrition;
- Parenting;
- Using public transportation; and
- Resume preparation and job search.

Street Outreach Services. These activities consist of:



- Assessment and evaluation:
- Crisis counseling;
- Referral to coordinated entry and linkage to mainstream services;
- Provision of basic needs; and
- Follow-up assistance.

Client Assistance. These activities consist of: • Transportation costs (bus, taxi, gas vouchers, bicycle repair, etc.);

- Costs of obtaining ID cards, birth certificates, and other vital records;
- Basic necessities such as water, food, clothing, bug spray, hygiene kits, laundry/cleaning supplies, first aid, blankets, etc.;
- Medical, dental, and prescription copays;
- Household items/furnishings;
- Relocation assistance to access support from family/friends Employment and work-related supplies; and
- Childcare

ADMINISTRATIVE COSTS

Section 420.622(4)(c), Florida Statutes, authorizes a CoC to spend a maximum of ten percent (10%) of its grant award on administrative costs. Administrative costs must be used by the CoC for staff salary, benefits, or operating expenses directly related to the management and oversight of this grant. In accordance with section 287.14, Florida Statutes, use of the Challenge Grant to purchase or continuously lease any motor vehicle is prohibited.

MATCH

The continuum of care lead agency shall also document the commitment of local government or private organizations to provide matching funds or in-kind support in an amount equal to 25 percent of the grant requested. Expenditures of leveraged funds or resources, including third-party cash or in-kind contributions, are authorized only for eligible activities carried out in connection with a project in which such funds or resources have not been used as leverage or match for any other project or program. The expenditures must be certified through a written commitment.

Emergency Solutions Grants

OVERVIEW

The relevant ESG regulations are 24 CFR Part 576.

Emergency Solutions Grants (ESG) program authorized by subtitle B of title IV of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11371–11378). The program authorizes the Department of Housing and Urban Development (HUD) to make grants to States, units of general purpose local government, and territories for the rehabilitation or conversion of buildings for use as emergency shelter for the homeless, for the

payment of certain expenses related to operating emergency shelters, for essential services related to emergency shelters and street outreach for the homeless, and for homelessness prevention and rapid rehousing assistance.

DEFINITIONS

Homeless means:

- (1) An individual or family who lacks a fixed, regular, and adequate nighttime residence, meaning:
 - (i) An individual or family with a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human beings, including a car, park, abandoned building, bus or train station, airport, or camping ground;
 - (ii) An individual or family living in a supervised 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, or local government programs for low-income individuals); or
 - (iii) An individual who is exiting an institution where he or she 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;
- (2) An individual or family who will imminently lose their primary nighttime residence, provided that:
 - (i) The primary nighttime residence will be lost within 14 days of the date of application for homeless assistance;
 - (ii) No subsequent residence has been identified; and
 - (iii) The individual or family lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, needed to obtain other permanent housing;
- (3) Unaccompanied youth under 25 years of age, or families with children and youth, who do not otherwise qualify as homeless under this definition, but who:
 - (i) Are defined as homeless under section 387 of the Runaway and Homeless Youth Act (42 U.S.C. 5732a), section 637 of the Head Start Act (42 U.S.C. 9832), section 41403 of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2), section 330(h) of the Public Health Service Act (42 U.S.C. 254b(h)), section 3 of the Food and Nutrition Act of 2008 (7 U.S.C. 2012), section 17(b) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)) or section 725 of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a);
 - (ii) Have not had a lease, ownership interest, or occupancy agreement in permanent housing at any time during the 60 days immediately preceding the date of application for homeless assistance;



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- (iii) Have experienced persistent instability as measured by two moves or more during the 60-day period immediately preceding the date of applying for homeless assistance; and
- (iv) Can be expected to continue in such status for an extended period of time because of chronic disabilities, chronic physical health or mental health conditions, substance addiction, histories of domestic violence or childhood abuse (including neglect), the presence of a child or youth with a disability, or two or more barriers to employment, which include the lack of a high school degree or General Education Development (GED), illiteracy, low English proficiency, a history of incarceration or detention for criminal activity, and a history of unstable employment; or

(4) Any individual or family who:

- (i) Is fleeing, or is attempting to flee, domestic violence, dating violence, sexual assault, stalking, or other dangerous or life-threatening conditions that relate to violence against the individual or a family member, including a child, that has either taken place within the individual's or family's primary nighttime residence or has made the individual or family afraid to return to their primary nighttime residence:
- (ii) Has no other residence; and
- (iii) Lacks the resources or support networks, e.g., family, friends, faith-based or other social networks, to obtain other permanent housing.

At risk of homelessness means:

- (1) An individual or family who:
 - (i) Has an annual income below 30 percent of median family income for the area, as determined by HUD;
 - (ii) Does not have sufficient resources or support networks, e.g., family, friends, faith-based or other social networks, immediately available to prevent them from moving to an emergency shelter or another place described in paragraph (1) of the "homeless" definition in this section; and
 - (iii) Meets one of the following conditions:
 - (A) Has moved because of economic reasons two or more times during the 60 days immediately preceding the application for homelessness prevention assistance;
 - (B) Is living in the home of another because of economic hardship;
 - (C) Has been notified in writing that their right to occupy their current housing or living situation will be terminated within 21 days after the date of application for assistance;
 - (D) Lives in a hotel or motel and the cost of the hotel or motel stay is not paid by charitable organizations or by Federal, State, or local government programs for low-income individuals;



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- (E) Lives in a single-room occupancy or efficiency apartment unit in which there reside more than two persons or lives in a larger housing unit in which there reside more than 1.5 persons reside per room, as defined by the U.S. Census Bureau;
- (F) Is exiting a publicly funded institution, or system of care (such as a health-care facility, a mental health facility, foster care or other youth facility, or correction program or institution); or
- (G) Otherwise lives in housing that has characteristics associated with instability and an increased risk of homelessness, as identified in the recipient's approved consolidated plan;
- (2) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 387(3) of the Runaway and Homeless Youth Act (42 U.S.C. 5732a(3)), section 637(11) of the Head Start Act (42 U.S.C. 9832(11)), section 41403(6) of the Violence Against Women Act of 1994 (42 U.S.C. 14043e-2(6)), section 330(h)(5)(A) of the Public Health Service Act (42 U.S.C. 254b(h)(5)(A)), section 3(m) of the Food and Nutrition Act of 2008 (7 U.S.C. 2012(m)), or section 17(b)(15) of the Child Nutrition Act of 1966 (42 U.S.C. 1786(b)(15)); or
- (3) A child or youth who does not qualify as "homeless" under this section, but qualifies as "homeless" under section 725(2) of the McKinney-Vento Homeless Assistance Act (42 U.S.C. 11434a(2)), and the parent(s) or guardian(s) of that child or youth if living with her or him.

Client Eligibility

Eligibility is limited to individuals and families who are homeless, at risk of homelessness, fleeing domestic violence, dating violence, sexual assault, stalking or human trafficking, or recently homeless and for whom providing rental assistance will prevent the family's homelessness or having high risk of housing instability.

ESG ELIGIBLE ACTIVITIES

Each component is described in the tables below, accompanied by a list of corresponding ESG activities and eligible costs.

Street Outreach

Essential Services related to reaching out to unsheltered homeless individuals and families, connecting them with emergency shelter, housing, or critical services, and providing them with urgent, non-facility-based care. Eligible costs include engagement, case management, emergency health and mental health services, transportation, and services for special populations. See 24 CFR 576.101.

Component: Street Outreach

These activities are designed to meet the immediate needs of unsheltered homeless people by connecting

them with emergency shelter, housing, and/or critical health services. § 576.101

Activity type: Essential Services



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Eligible costs:

- · Engagement
- · Emergency Mental Health Services
- · Case Management
- Transportation
- · Emergency Health Services
- Services for Special Populations

Emergency Shelter

Renovation, including major rehabilitation or conversion, of a building to serve as an emergency shelter. The emergency shelter must be owned by a government entity or private nonprofit organization. The shelter must serve homeless persons for at least 3 or 10 years, depending on the type of renovation and the value of the building. Note: Property acquisition and new construction are ineligible ESG activities.

Component: Emergency Shelter.

These activities are designed to increase the quantity and quality of temporary shelters provided to homeless people, through the renovation of existing shelters or conversion of buildings to shelters, paying for the operating costs of shelters, and providing essential services. § 576.102

Activity type: Essential Services

Eligible costs:

- · Case management
- · Child Care
- **Education Services**
- · Employment Assistance and Job Training
- Outpatient Health Services
- · Legal Services
- · Life Skills Training
- · Mental Health Services
- **Substance Abuse Treatment Services**
- · Transportation
- Services for Special Populations

Activity type: Renovation (also includes Major Rehab and Conversion)

Eligible costs:

- · Labor
- · Materials
- · Tools
- Other costs for renovation (including rehab or conversion)

Activity type: Shelter Operations

Eligible costs:

- · Maintenance
- Rent
- Security
- · Fuel
- · Equipment
- Insurance



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- Utilities
- Food
- · Furnishings
- Supplies necessary for shelter operation
- · Hotel/Motel Vouchers (When no appropriate emergency shelter is available for a homeless family or individual)

Activity type: Assistance Required Under the Uniform Relocation and Real Property Acquisition Act of 1970 (URA)

Eligible costs:

· Relocation payments

Other assistance to displaced persons

Shelter Operations, including maintenance, rent, repair, security, fuel, equipment, insurance, utilities, food, furnishings, and supplies necessary for the operation of the emergency shelter. Where no appropriate emergency shelter is available for a homeless family or individual, eligible costs may also include a hotel or motel voucher for that family or individual.

See 24 CFR 576.102.

Rapid Re-Housing

Housing relocation and stabilization services and/or short-and/or medium-term rental assistance as necessary to help individuals or families living in shelters or in places not meant for human habitation move as quickly as possible into permanent housing and achieve stability in that housing.

Eligible costs include:

Rental Assistance: rental assistance and rental arrears

Financial Assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs

Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

See 24 CFR 576.104

Component: Rapid Re-Housing.

These activities are designed to move homeless people quickly to permanent housing through housing relocation and stabilization services and short- and/or medium term rental assistance. § 576.104

Activity type: Rental Assistance

Eligible costs:

- · Short-term rental assistance
- · Medium-term rental assistance
- · Rental arrears

**Rental assistance can be project-based or tenant based.

Activity type: Housing Relocation and Stabilization Services

Financial Assistance

Eligible costs:

- · Rental Application Fees
- Security Deposits



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Last Month's Rent

· Utility Deposits

Utility Payments

Moving Costs

Services Costs

Eligible costs:

· Housing Search and Placement

· Housing Stability Case Management

· Mediation

Legal Services

Credit Repair

Homelessness Prevention

Housing relocation and stabilization services and short-and/or medium-term rental assistance as necessary to prevent the individual or family from moving to an emergency shelter, a place not meant for human habitation, or another place described in paragraph (1) of the homeless definition.

The costs of homelessness prevention are only eligible to the extent that the assistance is necessary to help the program participant regain stability in their current housing or move into other permanent housing and achieve stability in that housing.

Eligible costs include:

Rental Assistance: rental assistance and rental arrears

Financial assistance: rental application fees, security and utility deposits, utility payments, last month's rent, moving costs

Services: housing search and placement, housing stability case management, landlord-tenant mediation, tenant legal services, credit repair

See 24 CFR 576.103.

Component: Homelessness Prevention

These activities are designed to prevent an individual or family from moving into an emergency shelter or living in a public or private place not meant for human through housing relocation and stabilization services and short- and/or medium-term rental assistance. § 576.103

Activity type: Rental Assistance

Eligible costs:

- · Short-term rental assistance
- · Medium-term rental assistance
- · Rental arrears
- **Rental assistance can be project-based or tenant based.

Activity type: Housing Relocation and Stabilization Services

Financial Assistance

Eligible costs:

- · Rental Application Fees
- Security Deposits
- Last Month's Rent
- · Utility Deposits



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· Utility Payments

Moving Costs

Services Costs

Eligible costs:

- · Housing Search and Placement
- · Housing Stability Case Management
- Mediation
- Legal Services
- Credit Repair

Data Collection (HMIS)

ESG funds may be used to pay for the costs of participating in and contributing to the HMIS designated by the Continuum of Care for the area. More information about using an HMIS is available on the HMIS page.

Component: HMIS

These activities are designed to fund ESG recipients' and subrecipients' participation in the HMIS collection and analyses of data on individuals and families who are homeless and at-risk of homelessness. § 576.107

Activity type: HMIS

Eligible costs:

- · Contributing data to the HMIS designated by the CoC for the area;
- · HMIS Lead (as designated by the CoC) costs for managing the HMIS system;
- · Victim services or legal services provider costs to establish and operate a comparable database

Administration

Up to 7.5 percent of a recipient's allocation can be used for Administrative activities. These include general management, oversight, and coordination; reporting on the program; the costs of providing training on ESG requirements and attending HUD-sponsored ESG trainings; the costs of preparing and amending the ESG and homelessness-related sections of the Consolidated Plan, Annual Action Plan, and CAPER; and the costs of carrying out environmental review responsibilities.

State recipients must share administrative funds with their subrecipients that are local governments, and may share administrative funds with their subrecipients that are nonprofit organizations.

Administrative Activities. § 576.108

Eligible costs are broadly categorized as follows:

General management, oversight, and coordination

Training on ESG requirements

Consolidated Plan

Environmental review

Note: Administration is a not a component, it is considered an activity.

The CoC's Plan must be filed with the Office on Homelessness. The plan may be the HUD Consolidated Plan, the local Annual Action Plan, or any plan that the CoC helped draft that addresses the homelessness needs in the specific area (including the activity to be funded). The CoC shall be fiscally responsible for all

grant funds and for ensuring that funds are expended only for eligible activities in accordance with state expenditure guidance.

reference-guide-for-state-expenditures.pdf (myfloridacfo.com)

Always refer to the program regulations at 24 CFR Part 576 for complete information about all eligible costs and program requirements.

ESG - Rapid Unsheltered Survivor Housing

OVERVIEW

Generally, all ESG factors apply to ESG - RUSH except for special circumstances and client eligibility.

Three eligibility factors must be met:

- 1. Be homeless or at risk of homelessness
- 2. Have been residing in an area affected by a major disaster declared pursuant to the Stafford Act on or after December 20, 2019 (e.g., an area covered by DR-4673-FL, dated September 29, 2022); AND
- 3. Have needs that will not be served or fully met by the TSA Program (42 USC 5170b) and other existing Federal disaster relief programs (including both Federal and non-Federal cost share).

If the client is already found eligible for ESG prior to the disaster, households are not required to re-qualify as homeless or at risk of homelessness for assistance under RUSH.

ACTIVITIES

Per ESG regulations, RUSH RRH can be used for up to 24 months of rental assistance with a waiver available to exceed the 24-month limit. In a Disaster Rehousing model, communities will utilize RUSH for shorter term RRH. Activities may include:

- Application Fees
- Move in Costs (Deposit, Prorated rents)
- Short Term Rental Assistance (Three months full rental assistance)
- Relocation costs
- Supportive Services Client choice in all aspects is imperative
- Housing Navigation is an essential activity for RUSH funding and should be individualized to the household and may include:
- Unit identification
- Unit Inspections (note available habitability waiver)
- Ongoing landlord connections

ADDITIONAL GUIDANCE

Supportive Services should be individualized and meet the needs of the participant.

In cases where a household moves to another community in Florida or another state, Case Management can be light touch.

Once per month Case Management engagement must be documented in HMIS - an engagement can be a phone call.

May require connections with CoC serving the geography where the client is moving.

When a participant requires more Case Management, creative solutions should be implemented.

Connect households to mainstream benefits.

ESG Requirements - HUD Exchange

The CoC's Plan must be filed with the Office on Homelessness. The plan may be the HUD Consolidated Plan, the local Annual Action Plan, or any plan that the CoC helped draft that addresses the homelessness needs in the specific area (including the activity to be funded). The CoC shall be fiscally responsible for all grant funds and for ensuring that funds are expended only for eligible activities in accordance with state and federal provisions.

Temporary Assistance for Needy Families

OVERVIEW

The relevant TANF regulations are 45 CFR Part 260.

To be eligible for assistance under the TANF grant, families must reside in Florida; have at least one household member who is a United States citizen or a lawful permanent resident; have a minor child living in the household full-time; and have a household income less than two hundred percent (200%) of the federal poverty level as annually published by the U.S. Department of Health and Human Services.

A minor child means a child under the age of eighteen (18); or if age eighteen (18), but not yet nineteen (19), is attending high school, a General Education Development (GED) program, a trade school, or other career training program on a full-time basis. A minor child cannot be married or divorced.

The adult who applies for the grant assistance must be either the parent, or the relative caregiver of the minor child residing in the household.

The household income means both earned and unearned income received in the month in which the family applies for assistance. Earned income is income received from employment or self-employment, including wages, salary, tips, commissions and bonuses.

Unearned income is income received for which there is no performance of work, or provision of services as an employee or self-employed person. The income of all members of the household shall be reported in determining eligibility of the family for assistance.

The family's housing emergency shall be the result of a financial or other crisis, as documented by the lead agency, or its sub-recipient.

TANF ELIGIBLE ACTIVITIES

Providers can assist with the following activities ONLY:

Past due rent or mortgage payments, not to exceed four (4) months of the client's rent or mortgage payment.

The providers can set a maximum dollar amount for assistance each client may be eligible to receive. However, this amount cannot be more than the total of 4 months of rent or mortgage payments.

Past due utility bills, not to exceed four (4) months of the client's arrears for electric, gas, water and sewer only. This does include reconnect fees.

The providers can set a maximum dollar amount for assistance each client may be eligible to receive. However, this amount cannot be more than the total of 4 months of past due utility bills.

Staff and operating costs for the providing mandatory case management services to clients assisted.

These are the costs of staff salaries who are providing the case management for clients assisted or operational costs associated with providing TANF assistance.

Administrative costs for the eligible applicant, up to a maximum of three percent (3%) of the grant award.

ADDITIONAL GUIDANCE

The lead agency must track, monitor, and report on each family assisted for a period of at least twelve (12) months after the last date of assistance was provided to the family. The lead agency shall report whether the family was able to avoid homelessness, as well as whether the family remains in permanent housing at the end of monitoring and reporting period.

If the lead agency is not the agency is not providing direct services, they are responsible for making sure this information is tracked and monitored.

The goal is that 85% of the families assisted will remain stably housed the year following the last date of assistance.

Providers must develop a case plan for each family that applies for assistance. For those families receiving assistance, the case plan should identify the amount of assistance the family will receive.

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Documentation should include copies of check payments made, household income/size, and the follow-up info of housing stability. For families not assisted, they income should be documented along with household size.

Providers must enter info on families assisted into HMIS.